



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-104

[Published on 20 July 2018 and officially closed for comments on 03 August 2018]

**Commenter 1: Lufthansa Technik – John Donegan – 01/08/2018**

### **Comment # 1**

As no additional requirements or changed compliance times are to be introduced, compared to AD 2016-0035 (initial revision), LHT kindly requests that the planned effective date of AD Revision 1 be increased from 7 (!) days after publication to the standard 30 days. This is to permit the operator to perform administration tasks without unnecessary time burden. Even if the AD revision is viewed as an administrative exercise for operators, there are significant resources required to update the AD references in the IT system and related documentation and to fulfil our additional internal quality assurance procedures (double and triple sign-off), all which must be completed before the effective date of an AD. Considering the large amount of SBs involved, LHT would appreciate EASA to evaluate if they can justify use of the standard effective date after publication, to provide assistance to operators. This would be much appreciated.

### **EASA response:**

**Comment agreed. The standard time period between revised AD publication and AD effective date is 7 days. Given the complexity of the subject and the number of applicable Airbus SBs, EASA exceptionally decided to extend that period to 30 days, as suggested.**

**The Final AD has been amended in response to this comment.**

