



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-145

[Published on 31 October 2018 and officially closed for comments on 28 November 2018]

Commenter 1: Lufthansa Technik AG – John Donegan – 08/11/2018

Comment # 1

The PAD proposes an effective date 14 days after AD issue date. LHT kindly requests that the effective date of the final AD is set to a standard 30 days after AD issue date.

Justification:

There are no new requirements in the PAD 18-145 that require short-term action on the fleet, so extending the period will have no safety impact. Although EASA has previously stated the opinion that operators may anticipate the requirements of the final AD from the PAD, the paperwork is only issued/revised after the final AD regulation has been published. The final AD, which plans to mandate 24 (!!) separate requirements for the A330, will lead to a very high administrative workload for operators. After review, 30 days after issue date was also granted for the recently issued Revision 1 to 2016-0035 (A340 WFD). This is highly appreciated.

EASA response:

Comment agreed. The final AD is effective 30 days after its publication date.

