



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-165

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Commenter 1: Airbus – Aurélien Person – 19/12/2018

Comment # 1

After review of EASA PAD 18-165, the following comment is raised by ATI concerning the chapter 3 of this PAD:

Chapter 3 of the PAD:

“(3) For aeroplanes for which operators could not demonstrate through the inspection and maintenance reports, that rudder servo controls has never been identified passing over the limits as defined in the applicable ATA 27 SB, within 3 000 FC or 30 months after the effective date of this AD, accomplish inspections of the affected parts in accordance with the instructions of the applicable ATA 55 SB.”

Comment:

This chapter doesn’t indicate which parameter (FC or months) shall be considered first after the effective date of this AD.

Clarification shall be brought in order to define if the inspection is required within 3 000 FC or 30 months whichever occurs first after the effective date of this AD or within 3 000 FC or 30 months whichever occurs later after the effective date of this AD.

Proposal:

The option “Whichever occurs later” gives more flexibility for the operator to schedule the inspection during C-check.

EASA response: Partially agreed.

EASA considers that “3 000 FC or 30 months whichever occurs first” is the appropriate indication. The final AD will be amended accordingly.

