



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-178

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Commenter 1: Lufthansa Technik – John Donegan – 11/01/2019

Comment # 1

ALS Part 2 Revision 3 Section 4 contains tasks with compliance limits which are applicable only after the current certified operating limits (MPPT) of the aircraft by EASA. EASA has released other ADs in relation to WFD which clearly state that such actions or compliance limits (due above the MPPT) are not mandatory. Example: AD 2018-0276 and 2016-0208 Note 4:

“Note 4: For certain actions as specified in Table 3, SMP limits in FH have been determined but are not shown in Table 3 because they exceed the currently applicable certified limit (DSG, ISG or ESG) of the aeroplane. For the purpose of this AD, SMP limits in FH, as defined in the applicable SB, are currently not applicable, as they depend on later extension of the certified limit and associated certification by EASA.”

In these examples, Airbus had published compliance times in a Service Bulletin above MPPT, which the EASA has decided are not mandatory. Consequently, the tasks from the ALS Part 2 should only become mandatory when they are put into Section 3 and then be mandated by a future AD. Airbus has stated in the Introduction to Section 4, that these tasks will be moved to Section 3 and only then introduced into the MPD, when the MPPT extension has been certified by EASA. Any associated tasks with a limit already below MPPT is already published in Section 3. Airbus already infers that the tasks published in Section 4 are currently not applicable: “If for any reason, the tasks listed in the below table become applicable...”.

Kindly confirm that ALS Part 2 Revision 3 Section 4 tasks are not to be mandated in the final AD (i.e. only Section 3 tasks are mandatory), in line with other published EASA AD policy.

EASA response:

Comment agreed. It is confirmed that only the tasks of Airbus ALS Part 2 Revision 3 Section 3 are required for accomplishment through the Final AD. Section 4 of Airbus ALS Part 2 Revision 3 contains tasks that are to be accomplished beyond the applicable certified limit and therefore do not need to be considered, since no aeroplanes are allowed to fly beyond that limit.

The Final AD has amended in response to this comment.

