

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-073

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Commenter 1: Lufthansa Technik – Walter Press – 29/04/2019

Comment # 1

Please find attached comments in regards to the Proposed Airworthiness Directive PAD 19-073, Application of lower threshold as specified under Note 3 and Paragraph (5)

****Note 3: For some modifications, a lower threshold, as defined in flight cycles (FC) or FH, whichever occurs later, as specified in Table 2 of this AD, was determined to be necessary.****

**** (5) For an aeroplane on which modification Action 1, Action 2 or Action 8, as applicable, was accomplished before 09 March 2016 [the effective date of this AD at original issue] and the time of modification was outside of the Window of Embodiment, as defined in this AD, within 30 days after the effective date of this AD, contact Airbus for approved 'additional work' instructions and, within the compliance times (window of embodiment) specified therein, accomplish those instructions accordingly.****

We understand that the lower threshold was introduced with AD 2016-0035 and that an additional inspection program has to be applied. However there could be the possibility that an aircraft may have or will receive the modification (Action 1, 2 or 8) after the effective date of 2016-0035 and was or will be under the given FC or FH parameters as defined in the table 2 of PAD 19-073 and for this aircraft we anticipate that also additional measures have to be applied. Furthermore EASA /Airbus are asked to clarify the window of embodiment more precisely.

For example: An aircraft was modified at 49761FH and 6365FC as per action 02, this aircraft is within the values of the window for SR optimized set, but had not reached the long range flight cycle (FC) limitation.

Please note that the LR/SR utilization program could be changed in the life of an aircraft for example when the aircraft is sold, leased etc. and that this can happen after 30 days from the effective day of your Airworthiness Directive.

EASA/Airbus are asked to reconsider this paragraph for a better understanding and in order to improve the readability of the AD we recommend to add a header above this paragraph otherwise you have the impression that this paragraph belongs to "Alternative Method(s)." A proposal could be:

Additional Work:



- (5) “For an aeroplane, on which modification Action 1 or Action 2 or Action 8 was accomplished and the accumulated FC/FH at the time of modification was below of the applied LR/SR window of embodiment given in table 2, contact Airbus for approved ‘additional work’ instructions within 30 days after the effective date of this AD. The additional work has to be carried out within the compliance time as stated in those instructions.

It is the responsibility of the operator to apply the additional work in the event that the optimized LR/SR program will be changed during operation of the aircraft after the effective date of this AD (+30 days).”

EASA response:

Comment partially agreed. The header ‘Additional Work’ has been added above paragraph (5) of the final AD. In addition, paragraph (5) has been slightly amended for readability and better understanding. After coordination with Airbus, it is confirmed that if one SB is embodied in respect to one of the windows (SR or LR), it is acceptable even if the aeroplane changes utilization during its life. Further explanations can be obtained contacting Airbus directly.

