

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-080

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Commenter 1: Lufthansa Technik – Walter Press – 10/05/2019

Comment # 1

A. PAD 19-080 Chapter “Reason:” and “Required Action(s) and Compliance Time(s):” Paragraph (1)

EASA stated under the chapter “Definition” and “Required Actions” for the compliance time following:

“Airbus date of manufacture: The date of transfer of title (ownership) of the aeroplane upon delivery by Airbus to the first operator.”

*“Compliance Time (whichever occurs later, **A** or **B**)*

***A** Before exceeding 3 200 flight cycles or 19 600 flight hours, whichever occurs first since Airbus date of manufacture”*

DLH/LHT comment: Between the aircraft first flight and the transfer of title of an aircraft to the first operator always a few days will pass and the flight hours and flight cycle parameter will be counted from the airframe first flight. Using the Entry Intro Service as a start day will result in that the accumulated hours and cycles for the aircraft acceptance flight will be missed. The margin of the accumulated FC/FH may be little but for further AOT and Airworthiness Directives it would be preferable to respect this fact.

For a calendar time parameter the usage of the “Airbus date of manufacture” is fine, because the maintenance program of the operators will start at this date.

B. PAD 19-080 Chapter “Required Action(s) and Compliance Time(s):” Paragraph (3) Reporting:

“Within 30 days after the inspections as required by paragraph (1) of this AD, report to Airbus the inspection results where the results are no findings.”

DLH/LHT comment: DLH/LHT understands that inspection results shall be reported to Airbus for monitoring the status of the aircraft fleet. However the reporting is not an essential part to archive the airworthiness of the aircraft and for this reason EASA is kindly asked to state that it is not compelling to the Airworthiness Directive. For the operators there is an impressive burden to implement such a short term inspection with a potential massive impact in the aircraft operation and for this reason you should ease this reporting requirement. We are confident that a reporting of relevant findings will be sufficient for Airbus to gain an overview of the fleet status.



C. Previous / advanced accomplishment of AOT:

Additional DLH/LHT would like to have a statement or credit note that the accomplishment of the inspection as per AOT A57L014-19 before the publication of the Airworthiness Directive will fulfil the requirements of AD, an example for the wording could be:

Credit:

Inspection accomplished before [day. Month. Year] [the effective date of this AD] in accordance with the original issue of the AOT A57L014-19 constitute an acceptable method to comply with the requirements of paragraphs (1) to (2) of this AD.

EASA response:

- A. Comment not agreed. It was determined that ‘Airbus date of manufacture’ as defined in the Final AD is the appropriate point to start counting to determine when actions are required.**
- B. Comment not agreed. This subject being new and unexpected, it is important to obtain a fleet overview, hence the reporting requirement. This will help to determine if further actions are necessary or not.**
- C. Comment not agreed. The requested credit already exists. Actually for almost all EASA ADs, the sentence ‘Required as indicated, unless accomplished previously’ is present at the beginning of the RACT, giving credit for actions accomplished before issuance of an AD, provided these were done using the instructions referenced in the AD.**

No changes have been made to the Final AD in response to this comment.

