

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-143

[Published on 25 July 2019 and officially closed for comments on 22 August 2019]

### Commenter 1: Air France – Gueraud Gwenaël – 26/07/2019

#### Comment # 1

In the requirement part, it is specified «since date of manufacture » and in upstream of PAD, the date of manufacture matches to the date of transfert of title. In reality the manufactured date and the date of tranfert of title are different.

AFR suggests to :

1/ **Remove this part** : « Airbus date of manufacture: The date of transfer of title (ownership) of the aeroplane upon delivery by Airbus to the first operator. »

2/ **Replace this sentence** « Within 147 months since Airbus date of manufacture, modify the affected parts in accordance with the instructions of the SB. » by this one,

« Within 147 months since Airbus **date of delivery**, modify the affected parts in accordance with the instructions of the SB. »

#### EASA response:

***Comment not agreed. The definition used is one taken from Airbus documentation and is used to avoid misunderstanding or misinterpretation.***

***The date itself is known (accessible on Airbusworld) to all operators: the date of delivery (transfer of ownership or 'title') to the first customer, or date of first C-of-A, or first C-of-A for export, as applicable. Referring to 'date of delivery' instead, as the commenter suggests, creates an ambiguous statement, open to interpretation (e.g. delivery to second or later customer/operator).***

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

**Commenter 2: Qantas Airways – Wayne Nelson – 01/08/2019****Comment # 2****References:-**

1. PAD 19-143
2. SB A380-53-8153 Rev00 dated 24th April 2019
3. TA 80533423/009/2018;
4. TD\_80533423\_010\_2018

QANTAS recently received the attached Proposed AD. On reviewing the subject PAD QANTAS would like to provide the following provisional comments:

- A. There is no reference in the PAD to credits for aircraft modified prior to the release of the MOD SB, confirming that such modifications are acceptable for compliance to the required actions given in this AD.  
NB: QANTAS has completed the subject Modification on MSN 0014 (VH-OQA) earlier this year (Jan-Feb) prior to release of the Ref 2. SB. For that aircraft the MOD was carried out in accordance with AIRBUS Ref 3. TA and Ref. 4. TD instructions.
- B. QANTAS notes that the Ref 3. TA is referred to in the Ref 2. SB Para. 1: E Compliance, stating that accomplishment of the TA satisfies the requirements of the SB. This Paragraph also includes a similar statement with reference to the TD which effectively contains the SB instructions. However the TD quoted is not the TD applied to MSN 0014 (refer Ref 4.).
- C. QANTAS requests that prior to AD issue that the SB is revised to include the Ref 4. TD as satisfying the AD requirements. QANTAS also requests that the AD includes a credit statement as noted in A. above.

**EASA response:**

- A. Comment noted. It is expected that, in parallel with AD issuance, Airbus will apply (on behalf of affected operators) to EASA for an AMOC approval to address all pre-SB actions.**
  - B. Comment noted, but not agreed. This is related to the content of the SB, not the AD, and should be addressed to Airbus, who have informed EASA that the TD in question is not linked to the Ref 3. TA.**
  - C. Comment not agreed. See EASA answers to points A. and B. above.**
- No changes have been made to the Final AD in response to this comment.**

