

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-145

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Commenter 1: Lufthansa Technik – Sebastian Eichentopf – 15/08/2019

Comment # 1

- A. According to PAD, the modification as per SB 53-8183 has to be performed within 9000 FC or 66300 FH or within 42 months after effective date of this AD. Therefore, the modification has to be performed in the beginning of year 2023 at latest. According to SB 53-8183, the time limit for the modification is July 31st, 2025, besides the FC-/FH-values as mentioned in the PAD. We would like to know, why the time limit will be reduced by the announced AD for more than 2 years?
- B. According to the “Applicability” of PAD 19-145, all A380 MSN are affected except a/c that have embodied modification 77936 during production. Modification No. 77140T84813, which will be installed in production on MSN 0260, 0261, 0264 and subsequent as described in SB 53-8183 under “Planning Information”, 2nd “NOTE”, is not mentioned in the “Applicability” of the PAD even if it seems to be also a sufficient modification.

EASA response:

- A. Comment noted. The threshold of 42 months was discussed and agreed between EASA and Airbus sometime after the SB was published, which is why the 42 months do not appear in the SB.**
 - B. Comment noted. The reason why mod 77140 is not referred to is because that mod is not yet EASA approved.**
- No changes have been made in response to the Final AD in response to this comment.**

