

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-036

[Published on 14 February 2020 and officially closed for comments on 13 March 2020]

### Commenter 1: Cathay Pacific Airways – Jimmy Cheng – 02/03/2020

#### Comment # 1

For Paragraph 3, CPA would like to know how “Reporting within 30 days” is part of airworthiness requirements? CPA believe that if this is not an airworthiness requirement, then it should not be included in the AD.

**EASA response: We disagree.**

**The proposed AD requests for reporting to Airbus the outcome of the inspection, even in the event of no finding.**

**In case of finding resulting in damage in the affected rod and/or surrounding structure, the reporting is needed in order to provide assessment for the potential implementation of a further inspection or repair on the affected or neighbouring parts.**

**The reporting in case of finding with no related damage or in case of no finding allows EASA to have the global picture of the extent of the issue, identifying the different cases of affectation MSN per MSN, and ensuring that all the hypotheses followed for the definition of the AD inspection are fulfilled.**

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

### Commenter 2: Delta Air Lines – James Thompson – 04/03/2020

#### Comment # 2

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 20-036, dated 14-Feb-20

(B) Airbus Service Bulletin (SB) A350-53-P054, dated 15-Oct-19



Paragraph (3) in Ref (A) requires reporting within 30 days, including the reporting of no findings. However the NOTE under steps (b).2.a.<2> and (b).2.b.<2>.<a>.[3] on pages 12 and 13 of Ref (B) state that sending the report is not required for compliance (RC), indicating that Airbus does not see reporting as required. Since the task has such a lenient compliance period (approximately 16 years based on our utilization), and since few unlocked washers are expected, Delta requests that the EASA AD specifically state that reporting is not required.

***EASA response: We disagree***

***Ref EASA answer to comment # 1.***

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

