

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-044

[Published on 26 February 2020 and officially closed for comments on 25 March 2020]

Commenter 1: Delta Air Lines – James Thompson –18/03/2020

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 20-044, dated 26-Feb-20

(B) Airbus Service Bulletin (SB) A350-57-P036, dated 17-Jan-20

The Modification paragraph states to perform Ref (B) before exceeding 6 years since date of manufacture. Delta adjusts our routine maintenance program to maximize utilization and we extend visit limits when findings are few. For example, our 767's have had a 7-year H-Check for years because of that fleet's great performance. Delta expects to extend our A350 C-Check to 3.5 years and would pursue extending our 6-year H-Check to 6.5 or 7 years if the performance is as good as expected. Since we operate under our own reliability program, we can do this. (Most operators do not have a reliability program and must remain with the MPD limits.) Since the threshold is somewhat random, Delta recommends that the Modification limit listed in the EASA AD be revised to state "Before exceeding 7 years since aeroplane date of manufacture . . .".

EASA response: Comment not agreed. The compliance time is calculated independently of individual Operator's maintenance regimes.

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