

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-064

[Published on 20 April 2020 and officially closed for comments on 04 May 2020]

Commenter 1: Emirates – Margaret Grace Torcedo – 22/04/2020

Comment # 1

We received a copy of subject PAD 20-064 and below is not directly related to the PAD 20-064 content, however, it is a concern related to the topic post-modification. We recently attended via Webinar hosted by Airbus in mid-March 2020 and with attendance of several operators to discuss intent of subject PAD and with reference to Airbus AOT A25R018-19.

Airbus informed that:

- there is no Part Number (PN) roll of the covers post modification (seal cut)
- no PN change for new production light covers
- no new raw material seal with correct width.

As these light cover panels are regularly refurbished and at times replaced, post-mod this AOT/PAD, a Murphy proof solution should be in place to prevent restoring light covers that have the original “uncut” seals before fitment.

Airbus informed us that AMM task 25-23-65-400-801-A will be revised/developed to do the seal cutting, prior to cover restoration however, we need to eliminate any human factor risk that can happen. We understand that a PN roll on hundreds of ceiling panels will be too tedious to do, as such we recommend that at least new production lateral light covers released at this stage, should at least, conform to the PAD requirements. Secondly, any release of the raw material seal should also be of the pre-cut condition. As such, AMM need not be revised and we the operators, can be assured of a compliant light cover assy. These issues were highlighted to Airbus but only the raw seal material PN change is being reviewed. We would appreciate if a solution to the probable human factor lapse / risk can be minimized, if not eliminated.

EASA response:

Comment noted. EASA consider that the corrective actions as specified in Airbus AOT A25R018-19 and the Final AD are acceptable to address the unsafe condition. Additional technical issues should be further discussed with Airbus.

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



Commenter 2: Deutsche Lufthansa AG – Sebastian Doerr – 02/05/2020**Comment # 2**

Thank you for providing subject EAD proposal for review. I would like to take the opportunity to inquire regarding the compliance limit. The related AOT A25R018-19 prescribes a compliance limit of 2000 flight hours. The EASA PAD 20-064 adds a 12 Month time limit to the flight hour limit.

Under the current circumstances in the middle of the Corona crises all DLH A380 are parked. Therefore the access to the aircraft is very limited.

Since we do not know when the aircraft will be reactivated, a 12 Month time limit will be very difficult to comply with.

Could you therefore please consider to omit the 12 Month time limit and keep to the 2000 flight hours as sole compliance limit.

EASA response:

Comment not agreed. As explained in the AD, the addressed unsafe condition might lead to reduced availability of functional oxygen masks to the occupants. To mitigate the risk associated with the potential unavailability of emergency equipment intended to minimize the injury to occupants in case of a depressurization event, in EASA view, a calendar compliance time also needs to be defined. The prescribed 12 months compliance time is deemed an appropriate and adequate margin.

It is reminded that an aeroplane is required be in a fully airworthy status only when resuming operation.

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

