

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-103

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Commenter 1: Deutsche Lufthansa – Sarah Bender – 10/07/2020

Comment # 1

Definitions section:

- A. “Airbus date of manufacture” is stated as the date of transfer of title to the first operator. Flight hours/flight cycles count from airframe first flight. Using the date of manufacture as start date for compliance time limits, the flight hours/flight cycles from the acceptance flight will be missed. It would be better to use “Flight Hours/Flight Cycles from first flight”. For calendar time parameters in the compliance time section the “Airbus date of manufacture” is fine, as the maintenance program of the operator also starts at this date.

Required Action(s) and Compliance Time(s):

- B. §(2) Table 2 – Initial SDI: From a technical point of view an aircraft which is parked or stored, e.g. for 12 months or 24 months, will not sustain any comparable cycling load to the aircraft wings as it will sustain in a flying environment. A crack will not develop over time while the aircraft is parked/stored and not flying. At the current Coronavirus COVID-19 Pandemic many A340-500/-600 are parked/stored over months. Besides the technical view, a calendar time limit is also an economical burden for the operator at the moment the aircraft will get back into flyable condition. DLH Engineering therefore asks EASA to delete the calendar time limit (24 months).
- C. §3: What means “Alternative Action”? With reference to §6, we interpret the requirement of §3, that when reaching the compliance time as defined in §2, all affected areas have to be inspected. If one or more of the affected areas have instructions of an RDAS, these instructions have to be accomplished for that specific area (unless otherwise indicated in the approved RDAS).
- D. §6: “Repair on an aeroplane of one of the affected areas....”. We suggest to use instead of the expression “one” an expression like “one or more”, otherwise this can be misleading to the fact that two or more repairs can be seen as terminating action for the repetitive SDI. A simplification of the paragraph for better readability would be desirable.

EASA response:

- A. Comment noted, but not agreed. The reference ‘Airbus date of manufacture’, comes from the previous AD 2019-0297R1. It is a retained requirement and there is no reason to change the reference in this new final AD.**



- B. Comment noted, but not agreed. For any aeroplane that is out of service, compliance with ADs (if due or expired compliance time) is not required until (just before) that aeroplane is returned to service.*
- C. Comment noted. This paragraph is to cover some repair accomplished prior to issuance of this Final AD. If these repairs contain post repair inspection, they must be accomplished, instead of accomplishing the inspection required by this new Final AD.*
- D Comment partially accepted. The words “one or more” have been introduced but the rest of the sentence has not been changed as this is a standard text that is well known to operators.*
- No changes have been made to the Final AD in response to points A., B. and C. of this comment.*

