

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-131

**[Published on 03 September 2020 and officially closed for comments on 17 September 2020]**

**Commenter 1: Cathay Pacific Airways – Paul Li – 08/09/2020**

### **Comment # 1**

Airbus SB A350-31-P039 released ahead of AD release. As PAD proposes final modification within 8 months after effective of AD and Airbus and Leonardo are pushing for retrofit ahead of AD release, operator will easily fall into the trap to accomplish SB A350-31-P039 ahead of AD release. However, accomplishment of SB A350-31-P039 will discard the removable cover installed as per A350-31-P038 which will be out of AD 2020-0090R1 compliance. This was a poor coordination between Airbus and EASA and put operator in high risk of AD non-compliance.

### **EASA response:**

*Comment noted, but not agreed. It is common practice that an SB is published before Final AD issuance; in fact, before PAD issuance. If this were not the case, no PAD consultation would be feasible. This case is not much different from others.*

*It should be noted that accomplishment of any SB, in absence of an AD that requires that SB's action(s), is at operator's discretion.*

*For this specific case, to avoid the situation that the commenter describes, an application could have been made to EASA for an AMOC approval (either by any operator under EU regulation, or by Airbus on behalf of all operators) to record that SB A350-31-P039 provides 'equivalent safety' to the requirements of existing AD 2020-0090R1.*

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