

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-139

[Published on 10 September 2020 and officially closed for comments on 08 October 2020]

### Commenter 1: Emirates – Shoaib Rehmatullah – 15/09/2020

#### Comment # 1

##### References:

/A/ EASA PAD 20-139, Dated 10 September 2020

/B/ SB A380-54-8090 R00, Dated 21 July 2020

/C/ SB A380-54-8091, Dated 21 July 2020

As you are aware that majority of the A380 fleet is under long term storage industry wide. In light of this, please confirm whether the Ref. /A/ PAD's compliance time of 42 months (from the effective date of the AD) could be applicable from RTS date of the affected aircraft or it is independent of the RTS / storage period condition.

Having 42 months from RTS condition would provide better flexibility for planning the modification SBs (Ref. /B/ and Ref. /C/) during a heavy maintenance grounding.

##### EASA response:

***Comment noted, but not agreed. During the period that an aircraft is out of service, the requirements of applicable ADs do not need to be complied with. By the time the aircraft is (about to be) returned to service, all applicable ADs need to be reviewed and all required actions that are due or overdue must be complied with, before release to service. In case the operator still wants (or needs) a formal 'exemption' for the compliance time exceedance, the operator should apply for that to the State of Registry authority of the affected aircraft.***

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