

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-175

[Published on 06 November 2020 and officially closed for comments on 04 December 2020]

**Commenter 1: Cathay Pacific – Gary Chan – 18/11/2020**

### Comment # 1

Per Schroth VSB 25-22-00 Iss 00 Section 2 step 5, an identification sticker with Schroth logo with a small yellow dot will be placed on the buckle after buckle rework. This sticker might peel off during normal usage. The buckle itself and the restraint system are non-serialized parts. If the sticker is peeled off, there is no traceability if the affected part has been modified.

***EASA response: comment noted. The sticker with a yellow dot is part of the temporary fix, and the possibility it peels off in service after rework is not affecting the technical effectiveness of the temporary rework; EASA does not consider that a part, which lost the sticker after having been reworked as required by paragraph (1) of the AD, needs immediate replacement, if it can be proved, up to the satisfaction of the competent authority, that the part has been reworked. Operators may develop an additional system to track parts which have had the temporary fix accomplished (e.g., all parts installed on a/c tail number XY-ABC).***

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

