

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-190

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Commenter 1: Lufthansa Technik – Thorsten Koch – 02/12/2020

Comment # 1

The PAD lists a certain Part Number (WF019AJAAAAA) under “Servicable Part”

- The term “Serviceable Part” is misleading: Every component having a valid EASA Form 1 (Certificate Release to Service) is “serviceable”, even if PRE MOD. We recommend to change the wording.
- We recommend not to use a specific partnumber here: The projected compliance limit for the AD is 6 years. In this time, several other modifications (production or retrofit) may emerge which may include a further change in the partnumber. Those parts may then technically fulfill the requirement of the AD, while the partnumber is not listed as acceptable P/N in the AD. This would essentially require a revision of this AD. We therefore recommend to change the wording to “Cockpit escape hatches having modification 116113 embodied in production or SB A350-52-P051 embodied in service”. Which partnumber these are in detail, may be better communicated by OEM maintenance data (e.g. SB, IPC, CMM).

EASA response:

Comment not agreed:

- *The definition of serviceable part is used only in the context of this AD.*
- *It is not expected that further modifications of the cockpit escape hatch will be required in the future. If however this happens the AD can be revised to include the new part number.*

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

