

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-066

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**Commenter 1: Lufthansa Technik AG – Maximilian Pitzner – 10/05/2021**

### Comment # 1

- A. AD 2017-0044 was not superseded by AD 2019-0047 and 2019-0048, but “cancelled – replaced by”. Could you please correct the wording in the future AD. Furthermore both ADs 2019-0047 and 2019-0048 do not supersede any AD in its header.
- B. Final AD Compliance time of 48mth after the effective date is not in [line] with the RDAFs compliance time which is limited to one (1) year after its issue. Further Airbus is planning to revise SB 27-3237 and 27-4213 by October 2021. The use of later approved documents to comply with the requirements of the final AD is well noted by the comment under “Ref. Publications: “ . However, on LHT point of view the PAD does not taken into account any incorporation of the mentioned RDAFs into the upcoming SB1 revisions. This may force operators to use the mentioned RDAF beyond its limitation date or restricts operators to use the RDAF in combination with any SB1 revision already including the RDAF content.
- LHT proposes to align RDAF limitation with the final AD compliance time; or give a Note in the final AD allowing not to use the RDAF if all changes are incorporated in any SB1 revision. “The use of later approved SB1 revisions without the RDAF is acceptable, provided that the content of the RDAF is fully implemented in SB1 revision.”

### EASA response:

- A. Comment agreed. The Final AD has been amended accordingly.**
- B. Comment partially agreed. The expiry date in the RDAF is an Airbus internal reference, the aim of which is to ensure that, before that date, the SB is revised to include the RDAF instructions. However, the publication of the revised SBs has been postponed. Consequently, for using the RDAF instructions to comply with the AD, the expiry date is not relevant.**
- In EASA system, as specified in the comment, the use of later approved SB is acceptable for AD compliance. The Final AD has been amended to include a specific statement to make clear that a later revision of the applicable SB, containing the content of the RDAF, is acceptable for AD compliance.**