

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-104

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**Commenter 1: UPS Airlines – Mark Hilborn – 02/08/2021**

### Comment # 1

UPS Airlines noted a difference between the proposed rule and the OEM issued documentation. In the PAD Applicability section, only aircraft models are listed where as in the OEM documentation, the effectivity is identified as pre-Mod 11912 aircraft for the A300, A300-600 and A300-600ST model aircraft.

UPS Airlines requests that the EASA final ruling reflect the pre-Mod 11912 definition in a manner similar to that noted in Airbus Alert Operators Transmission (AOT) A57W017-212, Rev. 00 to prevent confusion between the two and other regulatory issued documentation.

### EASA response:

**Comment not agreed. Both the AOT and the AD define the Applicability by affected aeroplane manufacturer serial numbers (MSN). All of the MSN listed in the AOT are confirmed by Airbus to be in pre-mod 11912 status, and there are no other pre-mod 11912 MSN than those listed in the AOT. Therefore, the AD Applicability by MSN is unambiguous. Referring to mod 11912 in the AD Applicability could result in extra work for operators to check the modification status for their MSN, which is redundant. No change has been made to the final AD in response to this comment.**

