

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-168

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**Commenter 1: EASTERN AIRLINES TECHNIC CO. LTD. – Cheng Cheng – 18/11/2021**

### Comment # 1

In PAD No.: 21-168:

“Maintenance Actions:

(5) For all aeroplanes: Before exceeding 12 months since aeroplane first flight or within 12 months after the effective date of this AD, whichever occurs later and, thereafter, at intervals not to exceed 12 months, accomplish the maintenance tasks related to hidden failures in equipment involved in “not isolated over-temperature” failure condition, in accordance with the instructions of the AOT.”

The PAD did not mentioned the aircraft in Parking or Storage condition.

In AOT A36L004-20 R1:

“4.1.1 RC - ACCOMPLISHMENT TIMESCALE

For aircraft in Parking or Storage condition, and that would return to service at a date later than the compliance time, this AOT must be completed before starting operations. Consequently, should a compliance time (for (MM or hidden failure) be reached during this Parking or Storage period, the required maintenance actions can be delayed until the aircraft return to service, and remain mandatory for the return to service.”

CEA thinks a Grace time for us which can make the maintenance of the aircraft in parking or storage more convenient.

So could you please add this reCovid quirement into this PAD or the AD in future?

### EASA response:

***Comment partially 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. It is valid for this AD.***

***EASA believe these principles are generally well understood. Consequently, no formal AD compliance time extensions would be necessary to address this.***



*However, for the modification as required by paragraph (9) of the AD, EASA decided, in agreement with Airbus, to extend the compliance time from 12 months (as specified in the PAD) to finally allow 18 months after the effective date of the AD. The maintenance tasks as required by this AD address, during that period, the unsafe condition.*

*Paragraph (9) of the Final AD has been amended in response to this comment.*

