

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-088

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Commenter 1: Delta Air Lines – James Thompson – 15/07/2022

Comment # 1

Reference: (A) EASA Proposed Airworthiness Directive: PAD No. 22-088, dated 05 Jul 22

Modify Ref (A) PAD, credit paragraph (8) to allow credit for prior accomplishment if repetitive inspections/corrective actions in addition to the initial.

Para (8) allows credit for prior accomplishment of “...initial requirements of paragraphs (1), (2), (3) and (4) of this AD”. Therefore if the initial requirements for a part were complete in 2012 that part would be long overdue for the repetitive inspection interval of 26 months because no credit is given for the prior accomplishment if the repetitive inspections.

Change para 8 as shown below (Remove the word initial):

“...with the requirements of paragraphs (1), (2), (3) and (4) of this AD, as applicable, for that aeroplane.”

This change will allow the inspection to continue on their currently established intervals instead of causing instant over runs.

EASA response:

Comment agreed. EASA confirms that the wording “initial requirements” encompasses both the first inspection and the repeated ones, accomplished before the effective date of the new AD. Final AD has been amended accordingly.