

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-178

[Published on 09 December 2021 and officially closed for comments on 06 January 2022]

### Commenter 1: Qatar Airways – Komal Chouhan – 05/01/2022

#### References:

1. EASA PAD No.: 21-178
2. Airbus Mandatory SB A350-25-P181 Rev 00, issued dated 22nd July 2021
3. Airbus Mandatory SB A350-25-P182 Rev 00, issued dated 22nd July 2021

QTR reviewed the proposed AD Ref. 1 and we request EASA to revise the AD to provide an extension to Compliance Time, due to below listed points:

- In accordance with Ref. 2 and 3, the modification/ replacement compliance timeline is – Within 36 months after initial issue date of Airbus SBs; therefore, mod to be complied before 22nd July 2024.
- Considering AD effective date will be end of Jan 2022, the modification / replacement needs to be done within 27 months after AD effective date; which could be before 31st April, 2024.
- Also, you might be aware that QTR's few A350s are under long term parking, and obtaining ground time of in-service A350s would be difficult.

There would be approximately 3 months difference in the compliance timelines of Ref 1 Vs Ref 2 and 3; due to above stated reason, our planning may get difficulty in finding the ground time / scheduling the mod for compliance.

- In addition to above, Safran is having hard time in arranging and shipping the required post mod units.

(QTR following up for post mod units since Aug, 2021).

Keeping above in view, we may request EASA to extend the AD compliance timeline for the modification / replacement or at least align it with Mandatory SBs compliance timeline.

#### **EASA response:**

**Comment not agreed. The compliance time has been calculated based on fleet risk. No changes have been made to the Final AD in response to this comment**