

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-107

[Published on 09 August 2022 and officially closed for comments on 06 September 2022]

Commenter 1: Lufthansa Technik – David Gahl – 05/09/2022

- A) Dear EASA, this is one of the most irritating and complicated EASA ADs if ever seen. By having 20 paragraphs to be followed by the affected Operators this AD will put a huge effort of administration for the related airline CAMO Engineering Organizations.
In general we believe that an AD should always be designed the most easiest and simple way possible to avoid misunderstanding and wrong interpretation. Furthermore some questions regarding the AD paragraphs.
- B) For AD § 1, table 1: Why is there an A or B choice with an WOC logic? 30 or 40 days after 31 Dec 2020 is over for more then 1,5 years it will result in comp. time A in any case!
- C) For AD § 2, table 2: ...” ,but not earlier than 18 months, after 13 December 2020” ...?
Does this really make sense? How could something be done earlier than 18 M after 13 December 2020??? This case will not exist its AUG 2022.
- D) For AD § 16: Which time frame is applying to this §?
- E) For AD § 19: ...” provided no affected parts are re-installed on that aeroplane” ...?
How could that be? Acc. to AD § 8 it is not allowed to re install an affected part, after an non affected part was installed previously, from the eff. Date of the AD.
- F) I believe EASA has also put a lot work to create this PAD for this topic and I know for sure that this Fuel Pump topic is complicated, but I would really appreciate if EASA and Airbus will try to review and simplify the proposed AD.

EASA response:

A) Comment noted. EASA agrees ADs should be as simple as possible. Unfortunately, due to the number of requirements related to the fuel pumps, and with the intent to limit as much as possible the burden on operators (rather than having a simple requirement to replace certain P/N with new ones from the effective date of the AD), we could not find a simplest way to draft this AD.

B) This is a restatement from previous AD (ref. AD 2020-0283 paragraph (1)). Removing line B of Table 1 would make “illegal” all those initial inspections accomplished within 30/40 days after 31/12/2020 on fuel pumps having more than 10 000 FH / 3 000 FC. It is also expected that this



requirement has already been transferred into AMPs, and its implementation should not be a major issue; this is another reason for keeping it unchanged from previous AD.

See below a table tracing the requirements of the new AD to the superseded one.

AD 2022-0197 paragraph	AD 2020-0283 corresponding paragraph
1	1
2	2
3	3
4	4
5	None – new requirement
6	None – new requirement
7	None – new requirement
8	None – new requirement
9	None – Partially replace paragraphs 6 and 7
10	None – new requirement

AD 2022-0197 paragraph	AD 2020-0283 corresponding paragraph
11	None – Partially replace paragraphs 6 and 7
12	None – new requirement
13	None – new requirement
14	None – new requirement
15	8
16	9
17	10
18	11
19	None
20	None

C) This is a restatement from previous AD (ref. AD 2020-0283 paragraph (2)). See EASA answer to comment B.

D) Compliance time for the actions required by paragraph (16) is “concurrently with the MMEL amendment as required by paragraph (15)”. This is also a restatement from previous AD (ref. AD 2020-0283 paragraph (9)).

E) While the comment is in general correct, there may be cases where (e.g., temporary exemptions under Article 71 of the basic regulation) an affected part could be reinstalled on a Group 2 aeroplane. Given the complexity of this AD, we prefer keeping that sentence.



F) Thanks for understanding. We acknowledge this AD is more complicated than the majority of others AD. EASA and Airbus remain available to provide clarifications, if needed.

No changes have been made to the Final AD in response to these comments

