

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-145

[Published on 14 December 2023 and officially closed for comments on 11 January 2024]

**Commenter 1: Delta Air Lines – David Lashansky – 19/12/2023**

### Comment # 1

I know this language is not new to EASA PAD No.: 23-145 and I have skipped over this sentence several times in the past without fully understanding the intent.

“Credit:

(4) If, before the effective date of this AD, the AMP has been revised to incorporate the maintenance tasks as specified in a previous ALS revision and/or variation, that action ensures the continued accomplishment of those tasks.”

I understand this paragraph is saying that before the AD effective date, operators should be at the most current previous revision of the ALS.

However, I don’t think I have fully understood what is being implied. The fact that there are published ADs (2022-0085, 2023-0008 and 2023-0151) to mandate previous revision of the ALS, requires that operators are at those ALS revision levels and I’m not sure what para (4) is mandating.

I would really appreciate some clarification regarding the intent of para (4). What is being mandated by this paragraph?

### **EASA response:**

***Paragraph (4) of the AD is not a requirement, but a credit. That means if, assuming the new ALS is only introducing a new task (e.g. 101) and that the AMP has been revised to incorporate maintenance tasks from a previous ALS revision or variation e.g. task 001 - 100, now only the new and/or more restrictive tasks (e.g. task 101) from the new ALS revision / variation have to be incorporated into the AMP.***

***No change has been made to the final AD in response to that comment.***



**Commenter 2: Eastern Airlines Technic Co.,Ltd – Zhang YiJun –20/12/2023****Comment # 2**

CES uses the AMOC 10079577 28/06/2022, please see the attachment. But we see that the new ALS Part 2 R10 and PAD 23-145 do not cover the alternative method of this AMOC.

So CES would like to know whether the AMOC 10079577 28/06/2022 is valid for the ALS Part 2 R10 task 532166 and 533166? Or will EASA issue another AMOC for alternative method to task 532166 and 533166? Or will EASA revise the AD to add the content of the AMOC. Please review and, if required, include the AMOC reference in the AD.

**EASA response:**

**Comment agreed. Paragraph (5) was added to the Final AD in response to that comment.**

**Commenter 3: HK Express – Yan Chow – 22/12/2023****Comment # 3**

Airbus A320FAM ALS Part 2 Rev.10 Issue 03 was issued on 19 December 2023, after the issue date of PAD 23-145. Would you please update the content of the AD to include the latest revision?

**EASA response:**

**Comment agreed. The Ref. Publications section in the Final AD has been updated accordingly in response to that comment.**



**Commenter 4: Air France Industries – Quentin Mathieu – 02/01/2024****Comment # 4**

Since publication of EASA PAD No.: 23-145, Airbus has published “Airbus A318/A319/A320/A321 ALS Part 2 Revision 10 issue 03 dated 19 December 2023”.

Can EASA anticipate the incorporation of this new publication for the AD related to Airworthiness Limitations Section Part 2 – Damage Tolerant Airworthiness Limitations Items?

**EASA response:**

**See comment #3.**

