

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-103

[Published on 15 August 2024 and officially closed for comments on 12 September 2024]

Commenter 1: Delta Air Lines – Gabriel De Jesus Exclusa – 11/09/2024

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 24-103, dated 15 AUG 24

(B) A350 ALS Part 5 Variation 7.1

Commenter Request

Delta request for clarification to the Reference Publication Section statement, “The use of later approved revision of the abovementioned document, or of an ALS revision which includes the technical content of the Variation, is acceptable for compliance with the requirements of this AD.”

Request justification

The reason for clarifying this statement is that when Airbus publishes a new variation of ALS Part 5 Rev 07 (Var 7.1 or later), it will not require an AMOC. Airbus could issue a new variation that may or may not change the technical content that was revised in this variation.

1. What is meant by “which include the technical content of the Variation”? Does this mean if the technical content is exactly the same, it is acceptable to be used? If it’s not exactly the same (example: Task X was updated with revised limits, applicability, inspection type, etc... in a later revision or variation), is it or is it not acceptable to be used?
2. What is meant by “The use of later approved revisions of the above-mentioned document” when the document is a variation? Is this targeting A350 ALS Part Rev 08 or A350 ALS Part 5 Variation 7.1 rev 02 (This is typically published as variation 7.1 issue 02). Is an issue to a variation or revision considered as a later approved variation or revision, respectively?

List paragraphs that change; describe (nonobvious) changes

Reference Publication Section



EASA response:

Comment #1.1) Noted. Any later approved revision of the reference Variation should have exactly the same instructions and applicability. Differences can be in the administrative part of the new revision. Usually, the later revisions, contains a statement like “this ALS revision includes vaiation xxx”. In such cases, that revision is acceptable with no further AD revision.

Comment #1.2) Noted. The term “later approved revisions” in a generic manner refers to any amendment of the reference publication. In this context it is to be understood as referring to any later issue of the Variation 7.1

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

