

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-122

[Published on 18 October 2024 and officially closed for comments on 15 November 2024]

**Commenter 1: Delta Air Lines – Tara Jain – 12/11/2024**

### Comment # 1

#### Comment A

##### Commenter Request

Please kindly confirm that ALS Part 2 Revision 7 Section 4 tasks are not to be mandated in the final AD (i.e. only Section 3 tasks are mandatory), in line with other published EASA AD policy.

##### Request justification

ALS Part 2 Revision 7, Ref (B), Section 4 contains tasks that are to be accomplished beyond the applicable certified limit and therefore do not need to be considered. Section 4 of Ref (B) also states it is used to comply with FAR 26.21 regulation, as Airbus must present to the FAA the requirements related to WFD.

As stated in ALS Part 2 Revision 7, Ref (B), in the Introduction to Section 4, that these tasks will be transferred into Section 3 and then introduced into the MPD. Any associated tasks with a limit already below MPPT is already published in Section 3. Airbus already implies that the tasks published in Section 4 are currently not applicable: “If for any reason, the tasks listed in the below table become applicable...”.

Therefore, the tasks from the ALS Part 2 Revision 7 should only become mandatory when they are put into Section 3.

##### List paragraphs that change; describe (nonobvious) changes

Amend Ref (A) ALS Definition

#### Comment B

##### Commenter Request

DAL requests creation of an exception paragraph to address Ref (B) Section 3.2 Task 572004-02-06 applicability to state use of:

“GROUP 32E POST 54286 OR GROUP 33E POST 54286”

In lieu of



“GROUP 32E POST 54286 OR GROUP 33E POST 54826”

Request justification

During review of ALS Part 2 Revision 7, Ref (B), there were typo and errors found within the document. Ref (C) addresses those findings as detailed below.

- For Task 572004-02-06, in section 3-2, applicability is "GROUP 32E POST 54286 OR GROUP 33E POST 54826". However, Airbus confirmed in Ref (C), that POST 54826 is not correct and will be replaced by POST 54286.

List paragraphs that change; describe (nonobvious) changes

New Exception paragraph to be added to the Ref (A) PAD.

***EASA response:***

***Comment 1A) EASA confirm the understanding of the Commenter is correct. A change of the text of the AD is not deemed required, as the AD already requires accomplishment of tasks “as applicable to aeroplane model and depending on aeroplane configuration”. No changes have been made to the Final AD in response to this comment.***

***Comment 1B) Comment agreed, Final AD has been updated to include reference to the ALS Part 2 revision 7 Issue 2, which has been amended to correct that typo.***

