



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-029R1

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Commenter 1: United Airlines – Craig Hanson – 16/11/2016

Comment # 1

With increasing frequency, operators receive Airbus/EASA-approved Repair Design Approval Sheets (RDAS) for corrective actions due to various ALS Part 2 inspection task findings. Such RDAS's specify Instructions for Continued Airworthiness (ICA) which supersede or replace the specific ALS Part 2 task requirements for a repaired location. Repairs to ALS Part 2 affected areas may also be installed in accordance with the Airbus Structural Repair Manual (SRM) or an Airbus Inspection Service Bulletin (ISB).

When an ALS Part 2 task can no-longer be accomplished due to an existing repair authorized by RDAS, Airbus SRM, or Airbus ISB, operators request AMOC's to authorize the RDAS, SRM, or ISB ICA's in lieu of the ALS Part 2 task inspection at a particular MSN's affected location.

Please consider including a statement in the AD which authorizes ICA specified in Airbus/EASA approved RDAS, SRM, or SB as an acceptable means of compliance to the AD paragraph (1). This will help reduce the frequency of AMOC's while maintaining the safe condition.

EASA response:

Comment noted. Inclusion of a general statement in the typical ALS AD is, to date, not agreed. This comment will be possibly taken into account for future revisions of the ALS AD standard template.

To be noted that:

When the repair is related to a discrepancy identified during accomplishment of an ALS task, paragraph (2) of the AD requires using Airbus documentation and/or Airbus repair instructions. If these instructions have a statement that an ALS task is superseded/cancelled, no AMOC is required.

When the repair/modification instructions are not directly related to an ALS task, and/or when the ALS task can not be accomplished due to a previous repair/modification, an AMOC is required unless both of the following conditions are met:

- **the instructions include a statement that they supersede/cancel an ALS task, and**
- **the affected ALS task has not been modified after the date of approval of the repair/modification instructions.**

No changes have been made to the Final AD in response to this comment

