



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-111

[Published on 22 July 2016 and officially closed for comments on 05 August 2016]

Commenter 1: Lufthansa Technik – Jens Wiedau – 26/07/2016

Comment # 1

a) Table 1: The requirement for “More than 48.000 FC” in Table 1 is worthless in correlation with the given Grace period of 31 December 2016, as the 4 month requirement will be reached slightly before the granted Grace Period under consideration the AD will be published prior to 31 August 2016! Therefore DLH/LHT request to think about a deletion of this 4 MTH requirement and to keep the 24 MTH only, as it is considered as not necessary in order to simplify this AD as most as possible?

b) Table 2: The given Grace Period in Table 2 column THSA pre UTAS SB 47145-27-19 row A “within 12 months after 23 January 2014...” is obsolete, therefore it can be deleted to keep it simple!

c) SBC 47145-27-19: This AD requires to track the Life Limit of the renewed THSA's, but unfortunately after this modification the P/N is not changed to make it visible the THSA is already renewed. Although form, fit and function is not changed it makes sense to define a specific P/N range in order to make it visible by the P/N that the THSA is renewed. By this, the tracking would be simplified and potential errors can be minimized, especially under the aspect a renewed THSA is not affected by this inspection requirement anymore. This should be the tenure of the EASA. I am well aware this creates some effort at UTAS, but it is an important part to keep the A/C airworthy!

Consequently I would like to take the opportunity to request Airbus/UTAS and the EASA to rethink about a dedicated P/N range?

Thank you in advance for your assistance and understanding

EASA response:

a) Comment agreed, the final AD has been modified accordingly.

b) Comment agreed, the final AD has been modified accordingly.

c) The renewal of the THSA does not involve modification, but only replacement of parts and components, consequently a new P/N is not mandatorily required. To be noted that, according to UTAS SB 47145-27-19, a placard has to be installed on the THSA after the SB application. No changes have been made to the Final AD in response to this comment.

