

EASA PAD N0 06-008 / R1
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General comment/query: *Note: <i>Comments extensive to PADs:</i> 2006-003 2006-004 2006-005 2006-006 2006-007	<p>We already talked about this AD wording being standardized among programs. I can understand that EASA prefers to have a standardized wording but I'm afraid the LR operators will be confused if the text is not customized.</p> <p>For instance, as the LR Fuel ALS doesn't contain any task with an interval greater than 10 years or 20000 FH, all the information about the associated grace period is useless. For the LR it is only necessary to clearly explain (1) when the task has to be applied first i.e. when the a/c reaches 6 years at the latest, and (2) the grace period is 6 years for a/c older than 6 years (my understanding TBC).</p> <p>These Ads were drafted on 06 January 2006 and posted onto the website I believe on 09 January 2006. The closing comment date is 23 January 2006.</p> <p>This comment period is not sufficient for proper review and feedback and I would propose that it be extended until a date after the EASA Fuel Tank Safety Workshop which is being held on 06/07 February 2006 which includes a discussion regarding CDCCL. This will give time for more considered analysis and feedback.</p> <p>Additionally, the Fuel Airworthiness Limitation items proposed by the manufacturers have not been formally approved or published yet and therefore we are unable to take this into account when commenting,</p>	<p>Olivier Fages DGAC France</p> <p>Steve Sells Airworthiness & Planning Manager Thomas Cook Airlines UK Limited</p>	<p>17/01/2006</p> <p>20/01/2006</p>	<p>Accepted. The PAD will be made more specific. Only in the specific case where task interval is greater than 10 years or 20000 flight hours, text will be added.</p> <p>Accepted. Consultation period has been lengthened and extended until 23 March 2006. Also EASA policy statement has been revised with a new date 01-07-2006 for unsafe related ALI and CDCCL, see EASA website.</p>

	<p>With regard to recently published PAD 06-004 / -006 / -007 / -008 Fuel Tank Safety SFAR 88 for A300/320/330/340 kindly be advised, the effective date of those Airworthiness Directives February 15th should be preferably postponed. So far the relevant Fuel Airworthiness Limitation Document are obviously not approved – as today confirmed by AIRBUS. We expect, that the proposed AD effective date should be in line with the approval date of the Fuel Airworthiness Limitation Document and the availability of respective documents (e.g. AMM, CMM) - as far as required for the accomplishment of defined tasks.</p>	<p>Wolfgang Riecher</p> <p>Maintenance Programme Manager</p> <p>Deutsche Lufthansa</p> <p>Technical Operations</p>	12/01/2006	
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