

EASA PAD No. 06-072R1
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>1. In the Compliance section, the timescale stated for update of the documentation is not sufficient to allow operators to receive the document from the Manufacturer, analyse and prepare data and submit to the NAA for approval and subsequent document production and distribution.</p> <p>This would be more realistically a three month period.</p> <p>2. In the compliance section, Para 1 and 2, the word 'strictly' is not required - either the requirement is adhered to or is not.</p>	<p>Steve Sells</p> <p>Thomas Cook Airlines UK Ltd</p>	19/05/2006	<p>1. We recognise that the time scale is really short. This has been discussed for a long time with Airbus as Airbus asked for a 3 month period. The problem is that Airbus has never justified any grace period covering all tasks of the ALI(except for 2 tasks) despite several requests on our side.</p> <p>In this case, we can not allow any grace period which is not justified.</p> <p>Then, it is up to each operator to check that they will not overdue any of the tasks mentioned in this document.</p> <p>(We made a sampling of tasks on which we saw that the compliance date was systematically more than 3 months since the AD issuance, but we did not do the exercise for the entire document).</p> <p>2. Agreed</p>
Compliance	<p>In the Compliance are mentioned two steps with different compliance method, as below quoted.</p> <p>"1. Within 2 weeks from the effective date of this AD, it is mandatory to strictly adhere to the requirements of the AIRBUS ALS Part 2 as defined in AIRBUS Airworthiness Limitation Items document AI/SEM4/95A.0252/96 at either:</p> <p>• issue 6 approved on July 15, 2003</p> <p>or</p>	<p>Mauro G. Spano</p> <p>Meridiana S.p.A.</p> <p>Engineering Dept.</p>	22/05/2006	<p>This means in 2 weeks after the effective date of the AD, every body will have to adhere to document AI/SEM4/95A.0252/96 iss7.</p> <p>In the time between, operators may still consider the iss6 of the document if this is more convenient for them.</p>

	<p>• issue 7 approved on February 7, 2006</p> <p>2. After 2 weeks from the AD effective date, it is mandatory to strictly adhere to the requirements defined in the A318/A319/A320/A321 Airworthiness Limitation Items document AI/SE-M4/95A.0252/96 at issue 7 approved on February 7, 2006."</p> <p>In both items is mentioned the same Ref. Document AI/SE-M4/95A.0252/96, with different Issues, but it is my understanding that in any way the compliance method is to adhere to the issue 7 approved on February 7, 2006, so my concerns are:</p> <p>- Is my understanding of the compliance correct ?</p> <p>- If yes, why to include the Issue 6 of AI/SEM4/95A.0252/96 ?</p>			