

**EASA PAD No. 06-084**  
**COMMENT RESPONSE DOCUMENT**

<b>PAD / DOC PARAGRAPH COMMENTED</b>	<b>COMMENT / PROPOSAL</b>	<b>AUTHOR OF THE COMMENT</b>	<b>DATE OF COMMENT</b>	<b>PCM RESPONSE</b>
Compliance	The 600 FH interval is not an appropriate interval for many operators. (Has this been validated by analysis?). The 600 FH interval is the target for the equivalent for the A Check (as previously used for the A320 Family), but have been evolved to a higher figure by a number of operators. This will potentially lead to inspections being carried out which are out of alignment with existing Maintenance Programmes and therefore an interval of 800 FH would be more appropriate.	Steve Sells  Thomas Cook Airlines UK Ltd	02/05/2006	At time of the first AD, 600FH was the reference linked to A check. Today, we are ready to justify an extension of the interval to 3000FH for aircraft having received ISB 57-1117R1. In addition, the final fix is under approval and should be mentioned in the AD before issuance. As such it is not anticipated to change the 600FH for aircraft having not done the ISB.
Compliance	paragraph 1- page 2 of the PAD It is more highlighted if we keep the paragraph numbering 1.6.before the sentence "Repeat the inspection of above paragraph 1.5. at intervals not exceeding 72 months".	Maryse Cassagnau- Segol  Office of Airworthiness  Airbus	10/04/2006	Ok
Compliance	Para 1.3, 1.4, 2.3 and 2.4  Monarch Airlines (MON) has concern with the usage of the 600 FH interval for the repeat inspections. This appears to be a flight hour interval based on the old "A-Check" interval and is generally carried out as a line maintenance function. On the A320 family there is no direct flight hour equivalent to the old "A-Check". As many operators escalate their check intervals, or for operational reasons, apply one off variations to the check period, this will require the inspection to be performed outside of a recognized package. As most maintenance performed outside a recognized package (scheduled check) is frequently performed at night and on the "flight line/ramp" area, this contradicts the message of "Human Factors".	Tim Sattler  Monarch Airlines (MON) –  United Kingdom	07/04/2006	See above.

	<p>If the 600 FH repeat interval is a calculated or scientifically/technically proved interval to detect the unsafe condition this obviously must be adhered to, but, if it is purely based on the old "A-Check" MON considers that AD interval should be set at an interval to allow for evolved check intervals or operational variations (for example 700 FH in this case).</p> <p>MON is also concerned at the number of EASA AD/PAD issued which have repeat intervals based on direct multiples of the published MRBR check intervals for the reasons mentioned above.</p>			
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