



**COMMENT RESPONSE DOCUMENT**  
**EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-027**  
 CLOSED FOR COMMENTS ON: 03 March 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>Concerning Compliance para (3):</p> <p>QUOTE</p> <p>(3) Within 30 days after SB embodiment date, as defined in paragraph (1) of this AD, report the accomplishment to AIRBUS.</p> <p>UNQUOTE</p> <p>As there is no inspection/feedback related to this modification, we believe that rendering the feedback of the modification accomplishment mandatory within 30 days is an unjustified additional burden on the operators.</p> <p>Each operator has a process in place to periodically report SB accomplishment to Airbus to ensure that the aircraft documents correctly reflect the modification state of the aircraft.</p> <p>For inspection SB's that are the subject of ongoing engineering investigations, we support the mandatory requirement for feedback, but in this case it is a straightforward modification without the requirement for data gathering.</p> <p>Therefore we believe that para (3) should be deleted.</p>	<p>Martin Downey</p> <p>Senior Technical Services Engineer - Airbus Fleet</p> <p>Cathay Pacific Airways Ltd.</p>	27/02/2009	To address this comment the reporting period is extended from 30 to 60 days.