


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-025 [Published on 29 March 2012 and officially closed for comments on 26 April 2012]

Commenter 1: UPS Airlines – Mark Garr – 26/04/2012
Comment # 1

In response to your proposal to adopt a new airworthiness directive (AD) for all A300-600 series aircraft:

When this AD becomes effective, UPS will accomplish the AD at one of the major maintenance facilities where our C-Checks are accomplished at a 30 month interval. The UPS line maintenance environment is not conducive for this work due to the required aircraft ground time, labor, and other resources which are available in our major maintenance facilities. When developing an acceptable timeline for accomplishment of an AD during a “C” Check, we have found that the following items must be considered and addressed:

1. The time required to obtain the necessary management & financial approvals for project accomplishment.
2. Parts lead time and acquisition.
3. The development of engineering orders from the applicable Airbus SB's.
4. Scheduling and prototyping the 1st aircraft.
5. Providing any revisions and changes to the prototype engineering order prior to initiating the accomplishment of the AD requirements on the remainder of the UPS fleet.
6. At this point the remainder of the fleet is accomplished which will generally take 30 months due to the existing C-Check schedule.

In summary, proposed EASA PAD No. 12-025 can be accomplished by UPS in the proposed timeframe of 48 months. We ask that the above considerations for timeframe accomplishment be considered in any future proposed EASA Directives

EASA response: Comment noted. However, it must be set forth that for determination of a compliance time (or timeframe in commenter's words), EASA follows the guidance depicted in Part 21 to first determine an acceptable risk-based reaction time. The selected compliance time for mandatory actions considers the reaction time, as well as economic and logistical aspects e.g. availability of spare parts or scheduled maintenance actions. But, economic and logistical aspects are always secondary compared to the risk-based reaction time.

The compliance time to perform the requirements of this AD was determined at 48 months.

No changes have been made to the final AD in response to this comment.