


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 12-146 [Published on 15th November 2012 and officially closed for comments on 13th December 2012]</p>

Commenter : Deutsche Lufthansa AG – Brigitte Gilles – 14.12.2012

Comment # 1

The AD only requires to remove lights without the permission for installation other P/N of lights. It is not possible to do maintenance work in this area without light. So the possibility must be given to install another light technology, which is approved. DLH want to install new lights at the same time where we have to remove the maintenance lights due to the AD for minimizing the inconvenience and for saving time and money. In this case the upcoming AD should allow the installation of other P/N for example Service Bulletins A330-33-3042, A340-33-4027 and SB A340-33-5007, which describes the installation of halogen lights, but not published yet.

For better understanding and the possibility of installation other lights, it should be written in Para (1) of the upcoming AD:


Within 26 months after the effective date of this AD, remove the maintenance lights in accordance with the instructions of Airbus Service Bulletin (SB) A330-33-3041 or SB A340-33-4026 or SB A340-33-5006, as applicable to aeroplane type and model.

Only PN 2LA002606-01 is not allowed to install anymore. The installation of any new service area lights in accordance with SFAR88 requirements is in compliance with this EAD. Therefore the implementation of SB A330-33-3042, A340-33-4027 and A340-33-5007 is in compliance with this EAD, too.

EASA response:

EASA partially agreed.

The Note in Paragraph (1) of the AD has been amended, and now provides a reference to the related Airbus SB numbers for the halogen type lights which are qualified explosion proof and can be installed (at operator's discretion) after removal of the non-explosion proof lights.

EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-146R1</p> <p>[Published on 28 January 2013 and officially closed for comments on 11 February 2013]</p>

Commenter : Scandinavian Airlines System – Kristian Mortensen – 05.02.2013

Comment # 1

I have two comments to the PAD 12-146R1

- 1. You have mixed two different areas in the same AD (par.1 ATA 33, and Par.2 ATA 36) that is not making the process more foolproof, I would prefer that you have issued two different AD's**
- 2. In Par. (2) you have made a very clear table 1 with the three different aero plane configurations, and the SB's that are necessary to perform. Unfortunately you have then made a Par. 3 that states if you perform A330-36-3037/A340-36-4033 you are also in compliance with Par 2 ????. If you add the two SB's to the Tabel 1 you can remove the Par. 3 and make the AD much easier to understand.**

Aeroplane config. Airbus SB as applic

A330 aeroplanes on which SB A330-36-3032 is embodied SB A330-36-3038

A330 aeroplanes on which SB A330-36-3032 is NOT embodied SB A330-36-3040 or A330-36-3037

A340 aeroplanes SB A340-36-4035 or A340-36-4033

EASA response: Comment understood.

Airbus SBs A330-36-3040, A330-36-3040 and A340-36-4035 were specifically issued to solve the potential unsafe situation while Airbus SB 36-3037 and A340-36-4033 are wider (they cover more actions). It was then chosen to emphasize the SBs which solve the potential unsafe situation and to mandate it through paragraph (2) of the AD; and to mention the alternative (Airbus SB 36-3037 and A340-36-4033) in paragraph (3) of the AD.