


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 13-065 [Published on 22 May 2013 and officially closed for comments on 13 June 2013]</p>

Commenter 1: Lufthansa Technik – Damir Ostojic – 06.06.2013

Comment # 1

Comment related to Required Actions and Compliance Times/Para. (3):

What kind of discrepancies are you talking about? Do you mean findings? Are Documentation inconsistencies meant?

In any case the Airbus together with certification Authority has to make sure that required accomplishment instruction **are available** at the time the document has been issued.

Also Airbus has to make sure that Accomplishment Instruction are covering the changed/new task requirement and that the task **can be performed** on aircraft.

The text: “If no compliance time is identified in the Airbus maintenance documentation, before next flight, accomplish the corrective action(s), **or contact Airbus** for approved instructions and within the compliance time specified in those instructions, accomplish those instructions accordingly”.

This part of the text is from our point of view not necessary, because that is standard practice given by the maintenance documentation such as AMM, TSM, SRM.

Also from our point of view not only Airbus can be contacted. One for subject aircraft type approved Part 21 Organization can also provide required data.

Please add: “contact Airbus or any for this aircraft type approved Part 21 Organization”.

EASA response:

Comment on § (3) – EASA finds it necessary to make it explicit (in the AD) that, in case of finding any discrepancies during an action required by the AD, corrective action is required, and to specify when. The ‘how to’ can be found in Airbus documentation – exactly which document is not always referenced in the Airbus ALS document – or obtained by contacting Airbus to request those instructions.

We concur that an action, other than contacting Airbus, could be acceptable. However, in that case it would be an ‘alternative’ to the AD-required action, which would require an AMOC application and approval. That this option exists is a well-understood principle and is made perfectly clear by the statement in the ‘Remarks’ section of the AD.

Unrelated to this comment, PAD 13-065R1 has been issued for additional consultation. No changes have been made to the revised PAD in response to these comments.

Commenter 2: LAN Airlines – Cristian Correa Aguilera – 06.06.2013

Comment # 2

AD 13-065 compliance was verified on LAN Airlines; and is already performed in our Airbus fleet under the proposed conditions by EASA.

EASA response:

Comment noted and appreciated.