


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 14-008</b> <b>[Published on 13 January 2014 and officially closed for comments on 10 February 2014]</b>

**Commenter 1: Lufthansa Technik AG – John Donegan – 17/01/2014**

**Comment # 1**

- Please reword Requirements 2.1 and 2.2 from (SRM) “limits” to (SRM) “repair limits”.
- In addition, or alternatively, please add a note to address the allowable damage limits given in SRM 57-70-00 (Figure 110) for Zone 4 which do not require corrective actions. These can also be considered to be within SRM limits. The current wording of the PAD requires a corrective action for all findings, which does not correspond to the SRM.

***EASA response:***

EASA disagrees with the comments.

Regarding point 1, the Structural Repair Manual (SRM) limits referred to in paragraph 2.1 and 2.2 of the AD comprise SRM Allowable Damage Limits (ADL) and SRM repair limits, and both must be complied with.

Regarding point 2, there is no intention to duplicate SRM ADL or SRM repair limits instructions, neither in the Service Bulletin (SB) nor in the AD, as this increases the risk of copying mistakes, adds complexity for updating processes, and could lead to confusion. The ADL and repair limits instructions are approved by the DOA within the SRM frame and are provided within this manual.

Even if the ADL or repair limits have been set to “No Further Application”, they must remain published and available through the SRM.

Example: In case the repair has been performed before the repair “deactivation” date, the repair remains valid (except otherwise specified), and in case it is subject to additional inspections the SRM must still provide repair and inspection instructions. In case of repair deactivation, the repair must not be done after the deactivation date.

The final AD text has not been changed further to these comments.