


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 14-053</b> <b>[Published on 21 March 2014 and officially closed for comments on 18 April 2014]</b>

**Commenter 1: Swiss International Air Lines Ltd. – Lukas Zuellig – 27.03.2014**

**Comment # 1**

SWR Engineering noted, that Messier-Bugatti-Dowty (MBD) SLA340-32-005 does not contain a complete list of parts, which will be affected of the new life limitation. Therefore MBD was contacted to get the missing data of not listed components. In their answer they informed us to get the manufacturer data from the MBD Folio 12. Now the PAD again refers to SLA340-32-005 which shall be used as a reference for the manufacture date of each individual component.

SWR Engineering strongly recommends to review this Service Letter and by adding all missing components before the release of the AD. I shall not be the case that operators have to contact MBD to get any missing individual dates of manufacture.

**EASA response:**

*It is believed the Messier-Bugatti-Dowty (MBD) SLA340-32-005 does contain the complete list of all affected parts for which the manufacturing date of the part was unknown. In absence of more detail data, EASA were not in position to check whereas some S/N are actually missing or if there is a misunderstanding regarding the P/N-S/N to be checked.*

*It is therefore suggested that SWR Engineering directly contact Messier-Bugatti-Dowty. In the meantime, Airbus and EASA will clear this point and identify if this list within the current Service Letter (SL) issue is correct or if there is a need to update the SL with some additional parts.*

*This AD is published with the current MBD SL Revision. As stated in the AD, the use of later approved revisions of this document is acceptable for compliance with the requirements of this AD.*

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

**Commenter 2: Deutsche Lufthansa AG – Brigitte Gilles – 08.04.2014**

**Comment # 2**

Regarding the PAD 14-053, which was published March, the 21th 2014, Lufthansa have one comment to the upcoming AD.

With the publishing of these new life limitations it could be happen, that some parts are already reached these limitations. For these parts the PAD doesn't permit a

grace period. Please review, if a grace period for those parts are possible.

***EASA response:***

***Comment understood but not agreed.***

***The evaluations performed by Airbus estimated that the life limits referenced in this PAD for these 5 P/N will not be reached by some part in service before 2017.***

***When history is not retrieved, Calculations have already been carried out for components that have lost traceability and provided the 25 years calendar life limit in the AD whichever occurs later with the Ldg/FH limitations. As per SLA340-32-005 Rev00 from Messier-Bugatti-Dowty (attached) the earliest date for which a part will reach this calendar time limitation is March 2016.***

***No Grace period is therefore necessary.***

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