


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14-128 [Published on 30 July 2014 and officially closed for comments on 27 August 2014]</p>

Commenter 1: Lufthansa Technik AG – John Donegan – 31/07/2014

Comment # 1

1. Correct the threshold in Table 1 for A310-300 AFT \geq 4 hours from 128000 FC to 12800 FC
2. The AD would mandate the ultrasonic inspection method and increase inspection levels while removing the option to keep detailed visual inspections going forward at more frequent intervals. We request to leave the option for operators to keep detailed visual at lower inspection intervals (more frequent inspections) rather than mandate ultrasonic and higher inspection intervals. The safety aspect is addressed by the frequency of the intervals; the economic impact is up to the operator to decide (reduce scope of repair).

EASA response:

EASA partially agrees with the comments.

1. *The threshold in Table 1 for A310-300 AFT \geq 4 hours has been corrected to 12 800 FC in the final AD.*
2. *EASA does not prevent any other alternative method to be used – such as more frequent detailed visual inspections as proposed by the commenter – as long as an equivalent level of safety can be demonstrated. As stated in paragraph (1) of the Remarks section of the AD, “if requested and appropriately substantiated, EASA can approve Alternative Methods of Compliance for this AD.”*

Commenter 2: Air Transat – Ianik Guy-Michaud – 11/08/2014

Comment # 2

All the interval values between PAD 14-128 and SB 57-2096 R2 are identical, except for the FH interval applicable to long range A310; PAD 14-128 shows an interval of 7100 FH for A310-300 long range aircraft (AFT \geq 4) while SB 57-2096 R2 shows an interval of 7500 FH. Is this a typo error?

EASA response:

EASA agrees with the comment. The interval in Table 1 for A310-300 (AFT \geq 4) has been corrected to 7 500 FH in the final AD.