

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-168 [Published on 25 November 2014 and officially closed for comments on 23 December 2014]

Commenter 1: LHT – Armin Bayer – 08/12/2014

Comment # 1

This PAD mandates the A380 ALS Part 4 to the operators.

Under EASA regulations, ALS parts are mandated by themselves even without EAD.

Applying EADs to an ALS Part creates another piece of administrative work to the operators.

From our point of view - the more appropriate manner to mandate ALS parts to e.g. FAA operators would be a restriction in the applicability like “**FAA operators only**”.

If the release of EADs on top of the ALS parts should be essential, then **please keep the EAD as generic (COVER EAD) as possible to avoid redundancy and conflicts in content** unless there are deviations intentionally. This would reduce the burden on the airline side for time-consuming recherche and clarification.

The compliance times of REF PAD and the ALS Part 4 are different.

- ALS Part 4 Rev10 compliance time is 01-OCT-2015
- EAD compliance time is 12 month after effective date of EAD.

EASA disagree:

1. EASA duty under ICAO Annex 8 Chapter 4, representing the European State of Design, is to inform other ICAO contracting States (NAAs) that an unsafe condition may develop when the ALS Revision is not implemented. The normal way of providing that information is by publishing Mandatory Continued Airworthiness Information (MCAI), otherwise known as ‘AD’.
2. Part M specifies that the AMP ‘must demonstrate compliance with’ (among others) ‘instructions for continued airworthiness’ as provided by the design (change) approval holder of the aircraft, engine, propeller, parts and appliances. However, Part M does not specify when compliance must be demonstrated after ALS Revision issuance. The Part M guidance material (not the regulation itself) refers to an ‘annual review’ process for updating the AMP, which is being used by some (not all) TC holders to specify in their ALS Revision that full compliance must be demonstrated (i.e. all tasks implemented into the AMP) within 1 year after ALS Revision approval.

Taking its ICAO duty seriously, and taking the diverging practices concerning AMP by NAAs into account, and considering that Part M is not (sufficiently) clear on when to comply, in 2008, EASA established a policy to publish ADs whenever an ALS was revised, containing new task(s), or more restrictive task(s).

The above principles are harmonised with (e.g.) FAA, ANAC and Transport Canada, who are committed to the same procedure.

The (P)AD proposes to do the following:

1. require the actions that are in the ALS, within the thresholds and intervals as specified in the ALS,
2. within 12 months, accomplish the 'administrative' action of updating the approved maintenance programme (AMP),
3. have that update approved by the State of Registry NAA, and finally
4. note that following the (updated) AMP is required in Europe.