


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 11-077</b> <b>[Published on the 27 July 11 and officially closed for comments on the 24 August 11]</b>

**Commenter 1: Metro Taxi Aereo Ltd – Luiz O. Machado – Wed 27/07/2011 21:53**

**Comment # 1**

"Dear sir,

We, operators, will never perform a test flight for certification of a maximum take-off weight increase on the operated Falcons 2000EX, whatsoever.

My comments are: Why modify a AFM in an aircraft already certified operating with in a certified performance chart?

If they certify the F2000Ex with winglets to a heavier/ increased take- off weight, and during these procedures they experienced an unsatisfactory control characteristics due to load, CG, slat-flap settings and/or horizontal tailplane settings, so the changes will be useful, if the operator opt to operate under the new characteristics of increased take-off weight.

Best Regards,"

**EASA response:**

**EASA confirm that the aircraft behaviour encountered during this flight test was inside the F2000LX weight and CG certified envelope. Consequently the CG envelope change introduced by AFM CP036 is applicable to F2000EX aircraft equipped with winglets. An explanation has been added in the Reason paragraph of the AD.**

**Commenter 2: OSAC c/o Dassault Aviation – Dominique GATARD – Mon 22/08/2011 10:00**

**Comment # 2**

"Bonjour

In [applicability], the commercial names "F2000LX" and F2000DX" (S/N 602) should be mentioned.

Also, the "F2000EX aeroplanes with winglets" could specify "by Dassault Aviation" as the API STC is not concerned by this AD.

In [reason], the new CG limits only apply to A/C with winglets.

Also, "slat/flap n°2" is not something seen in the cockpit, only "SF2".

In [ref publications], the CP is not a document supposed to be revised but the further revisions of the AFM will incorporate this CP.

Bst Rgds from France,"

**EASA response:**

**Point 1 applicability :**

**EASA do not consider the need to mention commercial designation in the AD applicability since Dassault Aviation modification M2846 or Dassault Aviation Technical Instructions TI-F2000EX-M2846-ME or TI-F2000EXM3118/ M2846-ME identify the winglets installation by Dassault Aviation on F2000EX aircraft In the same way, since the AD only reference Dassault Aviation TCDS number and Dassault Aviation modifications, that AD is obviously not applicable to F2000EX EASy aircraft fitted with API STC**

**Point 2 Reason**

**Agreed - AD has been amended.**

**Point 3 publications**

**Agreed – Paragraph(2) of the RACT and Ref. Publications of the AD have been amended.**

**Commenter 3: Aviation Partners Inc. (API) – Ken Buchanan –Tue 23/08/2011 01:55**

**Comment # 3**

"Aviation Partners Inc. (API) provides some comments to the PAD 11-077. Please see the attached file.

Regards,

[Attachment, Word file, 1 page, as follows]

Comments on EASA Proposed Airworthiness Directive (PAD No.: 11-077)

Aviation Partners Inc. (API) has reviewed this Proposed Airworthiness Directive (PAD) and offers the following comments.

The Dassault Falcon 2000LX is an airplane model which incorporates blended winglets supplied by API. The same blended winglets may be installed as a retrofit by FAA STC #ST01987SE or EASA STC #EASA.IM.A.S.02043. E.g. the configuration of a Falcon 2000EX EASy airplane with winglets is identical whether the winglets are retrofitted by the EASA/FAA STCs or provided as a Dassault production model Falcon 2000LX with modification M2846 installed.

API is concerned that that any PAD against the Falcon 2000LX could suggest that a similar action against the Falcon 2000 series with retrofit winglets is needed, which would not be warranted.

The PAD refers to flight tests performed by Dassault for a proposed maximum takeoff weight increase for the Falcon 2000LX. API performed similar test flights for

certification as required for its STC for winglets on Falcon 2000 series airplanes, however, without any gross weight increase. Since API and Dassault were working together in a joint certification program with both the FAA and EASA, the same flight testing results supported both the API STC and the Dassault production TC for the basic Falcon2000LX.

On a Falcon 2000EX fitted with API winglets a test was performed near to the current maximum takeoff weight of 42,200 lb, with slat/flap setting SF2, at the forward CG of limit of 17% MAC. Another test was done near to the current maximum landing weight of 39,300 lb, with SF2, at a CG of 16% MAC, 2% aft of the forward CG limit for that gross weight. These tests were performed by both EASA and FAA pilots, with no unsatisfactory control characteristics whatsoever identified at these adverse gross weight/CG combinations, flap setting, and horizontal stabilizer setting. Post flight test analyses also showed full compliance with the EASA and FAA certification requirements with considerable margin remaining.

After API was made aware of this PAD, API met with the FAA in Seattle to review again API's flight test results described above. The FAA was receptive to this review of API's test results and analyses, which the FAA had seen and accepted previously. In attendance at this meeting was the FAA pilot who flew these very conditions during API's F-2000 certification testing. API believes that there is no concern with the current EASA/FAA certification of the Falcon 2000 winglets STC at the currently approved gross weight and CG limits.

API has also requested detailed information from Dassault about their Falcon 2000LX flight testing for increased takeoff weight, so that we can compare that data to API's own flight testing. No such information has been received from Dassault at this time. Since API has discussed this situation with the FAA, the FAA itself may request the relevant information from Dassault and/or EASA.

API believes that any problem identified by Dassault is associated with Dassault's testing for a takeoff gross weight increase of its model Falcon 2000LX. An increase in takeoff gross weight is not proposed by API for its EASA or FAA STCs, so the winglets STCs should not be affected by the proposed AD action on the Falcon 2000LX.

August 22, 2011"

***EASA response:***

***EASA confirm that the aircraft behaviour encountered during this flight test fully applies to the F2000LX weight and CG certified envelope. The same aircraft behaviour also applies to F2000EX equipped with winglets per API STC FAA STC #ST01987SE or EASA STC #EASA.IM.A.S.02043, since F2000LX certification was based on API flight tests with identical weight and CG envelope.***

***EASA intend to review with the FAA the need for mandating the same CG limitations on F2000EX aircraft fitted with EASA STC #EASA.IM.A.S.02043***