


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p align="center"><b>EASA PAD No. 10-008</b>  <b>[Published on 07 January 2010 and officially closed for comments on 04 February 2010]</b></p>

**Commenter 1 : Cirrus Maintenance GmbH – Ian Viscogliosi – 22/01/2010**

**Comment # 1**

In response to PAD 10-008

I am at a loss to try and understand the engineering rational which has been applied in the case of this PAD.

First of all, the interval reduction from 3000 FH to 500 FH is extreme and brings into question why after 16 years of the aircraft being in service, a system safety analysis based on “in-service experience” has produced this interval reduction.

This also brings into question what the TC Holder(s) have been doing about this so called “in-service experience” after all this time.

Secondly if this PAD becomes an AD, it will place a great deal of pressure on the operators because, in the case of the Rudder and Elevator inspections this will require High Level Access, which is not ideal in a line maintenance environment.

**EASA response:**

Comment not agreed.

The revision of the CMR's is purely based on the system safety analyses (MOC 3 documents to comply with CS25, (mainly § 1309)). These analyses are theoretical calculations of failure probabilities, which have to comply with the requirements based on the Hazard Assessment at Aircraft Level.

In this specific case, a disconnect of the Spring- or Trim Tab is considered as a potentially catastrophic event and therefore requires a more detailed inspection of the mechanical components of the dual load path system. One of the main driving factors for these inspection intervals is the period of having an undetected (i.e. "dormant") failure in the system. The original Safety Analysis was based on an inspection interval of 3000 hours.

On Customer request (several years ago), all relevant documents have been revised to escalate the interval to 5000 hours (to fit with the C-Check interval).

Since only one inspection at 5000 hours would not comply with the requirements, an additional visual inspection has been introduced at 500 hours (A- Check interval).

Therefore the previous inspection at 3000 hours has been split to a detailed visual inspection at 5000-hour intervals, and a visual inspection at 500-hour intervals. The new CMR at 500 hours is considered as a reduced inspection interval and therefore the reason for this AD. The "new" check at 500 hours requires a visual inspection to detect failures of single elements within the dual load paths and does not consume a lot of man-hours. The biggest burden is probably the access to the Trim Tabs of the Elevator since this requires a safe working platform.

Based upon the agreed and approved inspection intervals, EASA has decided to require the more limiting CMR tasks via AD. At this stage there is no provision for

deviations from the approved data. All received comments have been discussed with the TC holder at a recent airworthiness review meeting.

However, upon operator request, there will be a review for alternative action(s) for the necessary tasks, although that would likely result in a more frequent DVI. Operators can contact the TC-holder to apply for the development of a new approved solution, or apply to EASA for approval of an Alternative Method of Compliance.

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

**Commenter 2: ScotAirways (Dundee) – Emmett Gavin – 31/01/2010**

**Comment # 2**

I have been working exclusively with Dornier 328 as a B1 for over 11 years and I would like to offer some comment on this proposed AD affecting Dornier 328 control rods.

Firstly the inspection interval reduction from 3000FH to 500FH currently proposed is excessive. Due to the requirement for high level access most operators will be forced to align the inspection with A1 checks every 400 hrs. This is effectively a 7.5 times reduction of the inspection interval. Even at A1 check level it will also mean the inspections frequently will be carried out on line stations with consequent additional difficulties such as poor lighting, bad weather, working at height outside etc.

My suggestion would be to align this task with the A3 check at 1200FH and to expand the task to include the application of a corrosion inhibitor such as ACF-50 to the rod ends. Without the application of a corrosion inhibitor this proposed task will achieve little as inspecting the rods will only verify what we the operators and the TC holder have known for years, specifically that the rod ends are prone to corrosion and are not fit for purpose. No amount of visual inspection is going to change this situation unless a corrosion inhibitor is applied at the same time or a different specification of rod end is made available.

**EASA response:**

See answers to comment # 1 above.

**Commenter 3: Aero Rescue Pty Ltd – Alexander Thoss – 02/02/2010**

**Comment # 3**

In regards to the published PAD 10-008 I will provide you with our thoughts and experience in regards to the mentioned/affected Trim Tab Linkage Assembly.

In our Operation, since 4 years with the Dornier 328-100 Mod 20 in Special Mission Configuration we have never experienced or found defects, (i.e. the mentioned cracks) on these Elevators, Rudder and Ailerons Trim/Spring Tab Linkage assemblies.

(I am personally look back into 12 years Base Maintenance experience with the 328-100 and 300)

We assume that due to our Search & Rescue Operation we would experience it, if there is a design or fatigue problem present in this Area as one of the 1<sup>st</sup> Operator.

Unfortunately, I have not the full background information available.

I would like to suggest following process:

One off inspection as already required acc to the mandatory SB 328-27-483

- If a high number of defective linkages has been found and reported; a reduction to a 2000FH (A5 or Phase 4) Inspection as repetitive interval would be necessary.
- If a low number has been found the 3000FH interval should be kept as it is.

***EASA response:***

See answers to comment # 1 above.