


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-099 [Published on 31 July 2012, re-published on 03 August as PAD 12-099R1 and officially closed for comments on 21 August 2012]

Commenter1: Transportes Aeromar – Octavio Barrientos – 31/07/2012

Comment # 1

Today we received EASA PAD 12-099 applicable to ATR 42 airplanes regarding Fuselage-Floor Beam Inspection / Wings-Time Limits-ALI; and we assume EASA will issue one (1) AD to cover these topics.

Due to topics involved on PAD 12-099 belongs to different ATA chapter, have different threshold and intervals, different method of compliance, and work area is not the same; we consider these topics must be separated and should issue one AD to cover each topic in order to don't mix these jobs and probably confuse operators.

EASA response:

Partially agreed,

This AD deals with a single issue which concerns more restrictive Airworthiness Limitations / Time Limits requirements.

This AD is issued to anticipate the Time Limits document revision; the issuance of this document and the incorporation of the more restrictive requirements in the operator Maintenance program will be equal to compliance with this AD.

Nevertheless, to clarify the above, the title of the Final AD has been amended to refer to the Airworthiness Limitation / Time Limits.

Commenter 2: Airlinair – Olivier Romieu – 01/08/2012

Comment # 2

The subject PAD addresses two topics: FR26 floor beam and SSI task applicability for pre-mod 2805 airplanes.

The requirements for each topic have different applicabilities and compliance times, and relate to different aircraft structural items.

It is acknowledged that both topics are linked to MRBR time limits.

However, and as long as the MRBR Time Limits have not been revised, it is felt that issuing two separate AD – one for each topic – would ease the compliance demonstration and traceability on operator side.

EASA response:**Partially agreed.****Refer to Comment #1 above.****Commenter3: Toll Aviation – Paul Amos – 02/08/2012****Comment # 3**

I have received PAD 12-099, upon investigation I believe there is an error.

PAD12-099 refers to fuselage floor beam (FR) 26

The modification (08039) referenced in PAD 12-099 is relating to SB ATR42-57-0038 which is the modification of the lower panel attachment at rib 13 and 14 areas.

EASA response:**Disagreed.**

PAD 12-099R1 refers to Floor Beam FR26 for potential crack issues and to Wings modifications 02805 and 08039 for correcting a discrepancy in the published documentation. Modification 08039 has no link with floor beam FR26.

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

Commenter 4: Nordic Aviation Capital A/S – Iver Ladekjær – 13/09/2012**Comment # 4**

Considering the clear content difference in PAD 12-099R1, including:

- Background/finding
- ATA/Area
- Concerned aircraft

I suggest the PAD divided into 2 separate AD's

1. ATR 42-200/300/320 – ATA 57 - Wings
2. All ATR 42 – ATA 53 - Fuselage

This will give a much clearer presentation and will allow a much easier AD follow up process for the operator. Furthermore I suggest the “Wing” AD to give the AC MSN applicability for the “pre 2805” configuration (upon input from ATR). (per my understanding MSN 001-285 will be concerned)

EASA response:

Partially agreed.

Refer to Comment #1 above.