



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-093

[Published on 06 July 2017 and officially closed for comments on 03 August 2017]

### Commenter 1: First Air – Graham Wilson – 07/07/2017

#### Comment # 1

In regards to PAD 17-093 it is noted that Service Bulletins 631-32-249,-250,-251 contain a statement that states:

“NOTE: Only the above mentioned MROs are authorized to perform inspections in the frame of this Service bulletin.”

Does this statement refer to all of the inspections listed in the SB’s including the on-wing DVI?

Clarification in the published AD regarding this statement would be appreciated.

#### EASA response:

#### Comment agreed.

*The inspection requested to be done by specific MRO detailed in the § E of the “ACCOMPLISHMENT INSTRUCTIONS” section of applicable VSBs should not be confused with the on wing repetitive inspections which are not requested to be accomplished by specific MRO.*

*The final version of SBs will make this point clearer. No changes have been made to the Final AD in response to this comment.*

### Commenter 2: Swiftair – José M. García – 03/08/2017

#### Comment # 2

Swiftair has been analyzing this PAD for compliance in our ATR42 & 72 Fleet and we have an issue with the availability of the serviceable u-joints.

As you can see in the attached e-mails, there are no spares for replacing the u-joints if any crack is found during AD inspections, 180 days lead time is not acceptable, and we believe EASA should be aware of this situation, as it will cause a heavy burden in all affected operators.



We understand that the problem is a real one and that it needs a solution, but we also believe the manufacturer has to be prepared for this contingency and prior to the AD release the assets should be in place, we also believe EASA should have coordinated, or even audit, u-joint manufacturer capabilities prior to AD release.

As of now, if the AD inspection finds a cracks, affected aircraft would be grounded for 3 months, to avoid this we suggest the following changes to the AD:

- To change the serviceable Note from:
    - o "Note 3: For the purpose of this AD, a "serviceable part" is an 'affected' U-joint (see Note 2 of this AD), released to service by SLS, free of defect, with the letter "V" added on the part (on the identification plate, or in the vicinity of the P/N marking); or a new (never installed) U-joint; or a U-joint repaired in accordance with SLS Component Maintenance Manual (CMM) 32-18-28 Rev. 10 or CMM 32-18-30 (both for ATR 42-200/300/320) Rev. 8; or CMM 32-18-45 Rev. 5 or CMM 32-18-63 Rev. 6 (both for ATR 42-400/500); or CMM 32-18-34 Rev. 9 (for ATR 72), as applicable, or later revision. The information of CMM revision used for the repair should be available in the EASA Form 1 of the part filled by the affected authorized repair company."
  - to:
    - o "Note 3: For the purpose of this AD, a "serviceable part" is an 'affected' U-joint (see Note 2 of this AD), released to service by SLS, free of defect, with the letter "V" added on the part (on the identification plate, or in the vicinity of the P/N marking); **or an 'affected' U-joint (see Note 2 of this AD) inspected as per AD requirements before installation and continuously inspected as per Par(1)** ; or a new (never installed) U-joint; or a U-joint repaired in accordance with SLS Component Maintenance Manual (CMM) 32-18-28 Rev. 10 or CMM 32-18-30 (both for ATR 42-200/300/320) Rev. 8; or CMM 32-18-45 Rev. 5 or CMM 32-18-63 Rev. 6 (both for ATR 42-400/500); or CMM 32-18-34 Rev. 9 (for ATR 72), as applicable, or later revision. The information of CMM revision used for the repair should be available in the EASA Form 1 of the part filled by the affected authorized repair company."
- This would be very useful in case of an AOG situation and would allow to avoid the 180 days ground time, also because operators may have complete MLG assemblies (in OH status) in stock with affected u-joints installed, that will become unserviceable at AD effective date.

**EASA response:**

***Comment partially agreed.***

***Specific logistics provisioning has been launched on U-joints in order to secure extra stock of parts and to support higher demand driven by the AD release. Bigger repair flow in shop will drive more replacement and the need for part has been assessed and covered.***

***Furthermore, regional stock on AD-related parts will be deployed as mentioned in the SB latest revision. No changes have been made to the Final AD in response to this comment.***

