

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-124

[Published on 11 July 2019 and officially closed for comments on 08 August 2019]

Commenter 1: Aéroclub du Gaillacois – Manuel Najar – 11/07/2019

Comment # 1

The applicability paragraph is not clear, the DR400/500 is not included in the DR400 series, it has its own serial number range.

Could you please precise the specific range of DR400/500 MSNs concerned ?

EASA response:

DR 400/500 aeroplanes have MSN 1 and up, the last possible MSN would be 2668. The model was produced between 1998 and 2008, currently the last MSN is MSN 45.

This PAD applies to all DR 400 (including DR 400/500), except those commercially known as DR 401 (MSN starting at 2669) which have a separate Aircraft Flight Manual.

The applicability paragraph has not been amended further to this comment.

Commenter 2: Sporting Aero – Peter Pengilly – 14/07/2019

Comment # 2

I suggest the time period for compliance proposed in PAD 19-124 is too short and should be at the next maintenance activity or within 12 months from the effective date of the AD.

Requiring the amendment to be inserted in the AFM within 4 months may require private owners to make a specific visit to their maintenance company just to have this AFMS incorporated, which is not warranted by the information provided.

This AFMS clearly provides useful information to operators. However, these aircraft have been in service for over 40 years, and have operated for many thousands of hours, without this advice being available with only very few incidents. The actions introduced are what would be done by a careful and



conscientious pilot, and do not introduce anything that has not been widely known for many years. I appreciate some pilots do not act in a careful or conscientious way – but will those people read the Flight Manual? With the advent of the internet this information can be disseminated to many within the target audience quickly. Requiring a specific maintenance activity solely for the purpose of incorporating this information into the AFMS is an undue burden on the private operator who many only visit his maintenance provider once a year. I request you revise the AD.

EASA response:

EASA agrees with the comment. The compliance time for AFM amendment has been increased to 12 months after the effective date of the AD.

