

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-028

[Published on 21 February 2019 and officially closed for comments on 21 March 2019]

Commenter 1: London Gliding Club – Aidan Waters – 22/02/2019

Comment # 1

I believe there is some confusion as to applicability for the P_AD.

It lists affected aircraft as: DR 400/100, DR 400/120, DR 400/120A, DR 400/120 D, DR 400/140, DR 400/140 B, DR 400/160, DR 400/160D, DR 400/180, DR 400/180 R, DR 400/180 S and DR 400 NGL aeroplanes, all serial numbers.

However, the related CEAPR service bulletin (180101) is only applicable to aircraft manufactured after 1993 (and serial number <2706).

EASA response:

Agreed: Affected serial numbers (s/n) were manufactured between 1993 and 2017 (s/n 2706 excluded) and are equipped with either a G type (Part Number (P/N) 56.18.68.320), H type (P/N 56.18.13.010) or J type (P/N 56.18.68.360) air induction duct, as applicable depending on the engine type.

In the revised PAD, the applicability has therefore been amended to include the affected air induction duct types and P/N.

CEAPR Service Bulletin 180101 will be updated to match the AD applicability.

Commenter 2: Frank Hall – 22/02/2019

Comment # 2

Since this PAD relates to a safety issue, it is entirely unreasonable that the Service Bulletin is NOT available without payment of a subscription to CEAPR.

Imagine that the Ford motor company identified a safety issue with one of its models and then tried to charged owners for telling them what the problem was.

Aircraft manufacturers should not be permitted to demand payment for information about safety. The PAD or any subsequent AD should include the entire text of the relevant service bulletin.

EASA response:

Because of the proprietary nature of service information published by the TC Holder, EASA is not in a position to include such documents in an AD. Regulation determines that TC holders have to produce safety information and make it available to operators, so that they can ensure an acceptable level of safety of the aircraft they operate. Having contributed to that regulation, EASA however has no jurisdiction about financial implications. Therefore, EASA ADs can only refer to TC holder documents to be used to re-instate an acceptable level of safety of an aircraft. EASA suggests to address this comment to the TC holder.

Commenter 3: Gerhard Pachowsky – 27/02/2019

Comment # 3

With regard to the a.m. PAD please note that the referenced CEAPR Service Bulletin No. 180101 is only applicable for DR400 A/C manufactured after year 1993 and S/N (tbd to be checked carefully by CEAPR) because many other DR400 in operation do have a different build standard Air Duct where the Service Bulletin does not apply.

EASA response:

Agreed. In the revised PAD, the applicability has been amended to include the affected air induction duct types and Part Numbers. Note that there are no aircraft manufactured between 1993 and 2017 with a different Air Induction Duct than those mentioned in the SB.

