


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 10-037 [Published on the 23 April 2010 and officially closed for comments on the 21 May 2010]</p>

Commenter 1 : Jan Ahlquist – Svensk Pilotutbildning AB Tecdoc Aviation Consultancy - 26 April 2010 22:44

Comment # 1

I strongly request that this AD to be issued, but the SB need to be changed in connection with this. Have had discussions with Centurion/Thielert regarding this SB and as it is due within 50hrs (55 in AD) and these aircraft Diamond DA40D and DA42D amongst others have a 100 hr inspection schedule it is very easy for operator to miss this. Questioned them why there was no AD issued or proposed due to the above fact, but got a very bad response that Centurion/Thielert did not issue AD's which I am very well aware of but I said that they need to notify EASA about the concerns. The reply was that there was not any intent to do so. Probably someone had the same concern as I, as it now is proposed.

For our self we had and aircraft for maintenance from 1 of April and this was released 19 of April, but we never got any information that it was issued and neither the Centurion/Thielert Service Center was informed.

Most of the operators are using Service Centers private, Flight schools and also in commercial use, if they don't have a planned maintenance within that time they will miss the information.

The SB has no information that it is a recurring action and no information of the 2 PN's on the chains to replace it with. Is one an old manufactured with only time allowed to 600 hrs and the other regarded as capable of use for 900 hrs?

No of the PN's mentioned is to be found in the Part Catalogue.

They have published that there is a extension for this engine in the pipeline, therefore it is important that this is considered when ordering the parts, and not issue the status of the part number difference or that there is no difference is ignorance to the operators/customers. SPU is an FTO organisation operating 12 airplanes/helicopters including 3 DA40D and 1 DA42D

EASA response:

Noted. Corrective actions to unsafe conditions may have a shorter compliance time that will require maintenance outside the normal 100 h interval. Service Bulletins are issued under responsibility of the TC holder and may differ from EASA ADs. Reoccurring replacement action is not considered by the TC holder because engine operation above the TBR (time between replacement) is not

recommended. Nevertheless, because aviation authorities may grant extensions to the recommended TBR (especially for private use), EASA requires reoccurring timing chain replacements every 900 hours for single engine installations.