EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-085 **[Published on 19 June 2015 and officially closed for comments on 17 July 2015]**

Commenter 1: MiniLiner – Massimiliano Bellin – 23/06/2015

Comment # 1

The compliance Time "During the next removal of the propeller from the aeroplane, or within 7 500 flight hours, whichever occurs first after the effective date of this AD" seems to us too restrictive, because this means that in case of a propeller swap from an a/c to another the rework as per Repair #53 must be performed if not yet done in the past. And this repair, with its precision rework of the dowel holes and its NDT requirement, is something that cannot be accomplished neither as a line maintenance nor as a base task by an operator. A shop should be involved and this means time and probably the shipping to it of the prop. Even Dowty SB F50-61-165 at para. 1.G says it needs 5 man hours to be incorporated "at repair or overhaul".

Moreover wording "During next removal" seems too tight if compared with the 7500 FH limit in case the prop is not removed. The Overhaul interval itself is 7500 FH.

Could the requirement be relaxed to something like "at next Propeller shop visit or within 7500 FH" or something similar?

Comment # 2

Checking the Hub Card of one of our propellers, we found that during an OVH dated 23/6/2000 the salvage with the number 650510057 was done. This number is the same that repair #53 requires to Mark on the prop after the rework. We don't know when this repair was first issued by Dowty but since the number is the same it seems that the hub was reworked and the liners installed as required.

Is such a review of maintenance records sufficient to consider the AD complied with or not?

EASA response to comment # 1:

EASA disagrees. The requirement will "mandate" reworking of the hub even if the propeller is removed from airplane for non-propeller maintenance reason (e.g., moving to a different aeroplane, engine removal and so on).

EASA response to comment # 2:

EASA agrees: A review of maintenance records is sufficient to consider AD compliance. A statement will be added to the final AD.

Commenter 2: VLM Airlines N.V. – Vincent Simmerok – 29/06/2015

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Comment # 3

We have a question concerning the recently published Proposed AD 15-085 regarding the Fokker 50 propeller. According to the PAD, we need to check and perform CMM 61-10-34, Repair Nr 53 at the next Propeller removal, or within 7500 FH (whichever comes first). Does this mean any Propeller removal, even if it is removed for reasons other than a shop visit, such as a swap between aircraft or for access? It would be easier for operators if the requirement was phrased as: “during next shop visit”. Even changing the wording to “the next scheduled Propeller removal” would make a very big difference.

EASA response:

EASA disagrees. During the discussion for a compliance time EASA decided that an earliest opportunity basis approach is best. EASA identified that the biggest risk of crack initiation is during assembly/disassembly of unscheduled removals of the propeller between scheduled shop visits.

Commenter 3: Amapola Flyg AB – Peter Isaksson – 29/06/2015

Comment # 4

Regarding section “Required Actions and compliance Times” Paragraph 2 dose not concur with Dowty SB F50-61-165.

PAD 15-085 calls for modification before next flight if the propeller is removed (no matter removal reason).

SB F50-61-165 give the operator until next overhaul ** to perform the modification.

It is not uncommon for us operators to be forced to remove an in service propeller due to damage or faulty de-icer boots. These defects are normally rectified in the field by ourselves, meaning that the propeller will not be sent to shop. The propeller is a very expensive piece of equipment that requires special means of transport due to its size.

I assume that the wording in the PAD is incorrect and that it’s not EASAs intension to recall propellers to shop prior to their normal shop intervals?

**The overhaul interval on Fokker 50 propeller (R410/6-123-F/35) is 7500 Fh or 10 YR whichever is first, with an intermediate 5YR inspection.

These are the only two inspections that requires the operator to send the 3,65 m propeller to shop.

Comment # 5

Additionally:

To the best of my knowledge:

1. there has not been any incidents/accidents due to dowel hole cracks.
2. the total number of cracked hubs are not known.
3. the three hubs mentioned in “reason” section in PAD 15-085 were all found in shop, during overhaul.

The reason for dowel hole cracks are mishandling of the propeller. Were the three hubs from the same operator?

How widespread is this problem?

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I urge EASA to reconsider; do not overrule Dowtys SB F50-61-A165 compliance times. Let us operators incorporate the necessary modification during normal shop intervals.

EASA response to comment # 4 and comment # 5:

EASA disagrees. Refer to EASA response to comment # 3.

Commenter 4: Fokker Services B.V. – Jan Pinson – 01/07/2015

Comment # 6

Paragraph "Applicability":

- propeller Models R352/6-132-F/1 and R352/132-F/2 must be changed into R352/6-123-F/1 and R352/123-F/2 (ref SB F50-61-A165).

Paragraph Reason:

- the current text "Since that SB was issued, three hubs have been found ..." may (for some readers with insufficient background information) lead to the assumption that these 3 hubs were post SB F50-61-165 while they actually were pre SB F50-61-165 hubs. Therefore, to avoid any possible misinterpretation and confusion, Fokker Services suggests to change the text to clearly state that SB F50-61-165 had not yet been incorporated on these 3 hubs.

Paragraph "Required actions and compliance times":

- subparagraphs (2) and (3) require action to be taken "before next flight" if during the inspection or maintenance records check of subparagraph (1) a hub is found installed with a p/n listed in table 1 which does not have repair 53 incorporated. That would have been no problem if the compliance of paragraph (1) would have been only "During the next removal of the propeller from the aeroplane". However, the additional compliance condition "or within 7500 flight hours, whichever comes first" for the inspection/administrative check of subparagraph (1) will result in situations where a/c have to remain grounded until a post F50-61-A165 propeller is installed. For these situations, installation of a post F50-61-A165 propeller "before further flight" is considered unreasonable considering the (long term) compliance conditions of subparagraph (1). Therefore, Fokker Services suggests to either delete the compliance condition "or within 7500 flight hours, whichever comes first" for the inspection/administrative check of subparagraph (1) or to allow a limited fly-on time if an affected hub pn is found during an inspection/administrative check as a result of the "within 7500 flight hours" compliance condition.

EASA response:

EASA partially agrees. Propeller models have been corrected. Clarification to SB version given in final AD. Operational reasons are not taken into consideration.

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