


EASA	COMMENT RESPONSE DOCUMENT
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Commenter 1: SIRIO SpA – Moreno Pisati – 03/09/2015

Comment # 1

Where “Required Action(s) and Compliance Time(s)” states:

“Before exceeding 4 000 flight cycles or 98 months, whichever occurs first since first flight of the aeroplane, inspect and, depending on findings, repair bores on stiffeners at engine pylons frame 41, in accordance with the accomplishment instructions of Dassault Aviation SB 7X-346”, because of the aircraft delivery occurs usually months after FIRST FLIGHT, it would mean that such modification (SB 7X-346) cannot be phased with the first 1C INSPECTION (normally due at 4000 flight cycles or 8 years plus 2 months since delivery).

Summarizing , it will be necessary to ground the aircraft for a long time before 1C INSPECTION (6 weeks ground time), with a further economic loss for operators. Focusing the Compliance Time on the landings aspect (4000) would surely avoid the anticipated ground circumstance.

EASA response:

Comment partially agreed. The ‘4000 FC’ has been kept in the Final AD but the date of first delivery of the aeroplane has been introduced, which should allow operators to reach the ‘1 C Inspection’. The Final AD has been amended accordingly.