



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-078

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Commenter 1: Stobart Air – William Murphy – 27/06/2016

Comment # 1

Regarding paragraph 1 of “Required Action(s) and Compliance Time(s)”:

The PAD proposes to begin counting the 14 months compliance period from date of installation, or if not known, the date of manufacture of the seat assembly. For instances where the seat assembly is installed at aircraft production, the specific installation date is generally unknown. As the aircraft is in a production environment until first flight, Stobart Air suggest that the 14 month compliance period start from the date of first flight.

Comment # 2

Regarding paragraph 1 of “Required Action(s) and Compliance Time(s)”:

Stobart Air request that a clarification be included to specify what compliance period is to be applied in situations where the SB has already been performed.

Comment # 3

Regarding paragraph 2 of “Required Action(s) and Compliance Time(s)”:

Use of the term “alternatively” is leading to confusing, and can have multiple interpretations. One interpretation is that for the repetitive 3 monthly inspections, the inspections can be performed in accordance with sub part A or subpart B of SB 536-25-002 (that is, the inspector can choose to perform subpart A or subpart B). A second interpretation is that one inspection is performed in accordance with subpart A, followed by subpart B on the next inspection, followed subsequently by Subpart A 2 months later and so on. If this is the case, this will present additional challenges to operators as to how to control such inspections. Neither interpretation is in harmony with the intent of the Zodiac SB, which in effect calls up a limited inspection (Subpart A), and depending on findings, calls up a more extensive inspection (Subpart B). Nevertheless, Stobart Air believe the current wording in the PAD does not present sufficient clarity and conciseness to state specific and unambiguous compliance requirements in this paragraph.

Comment # 4

Regarding paragraph 3 of “Required Action(s) and Compliance Time(s)”:

There is no reference in the SB to “Temporary Corrective Action” In order to harmonise requirements and wording, rather than using the term “temporary corrective action”, Stobart Air propose this wording be replaced by the term “Seat Performance Recovery”.

Comment # 5



Regarding paragraph 5 of “Required Action(s) and Compliance Time(s)”:

The PAD allows for installation of seats which have accumulated more than 14 months since first installation on an aircraft provided it has been inspected in accordance with SB 536-25-002 Section 2 Subpart B. The PAD does not state the maximum time is allowed to have elapsed since performance of this inspection, prior to installation on the aircraft. It is unclear if this is 14 months, 3 months, or indeed if there is any limit on this. Also, for the avoidance of doubt, Stobart Air believe this paragraph should state when the next inspection is due on this seat. Reasonable assumptions could be made that it is 3 months (or indeed possible 14 months) from date of last removal, last inspection or installation on an aircraft.

EASA response:

Comment #1

Not Agreed. Date of first flight could be unknown too. Date of manufacturing of the seat is marked on the seat as per ETSO requirement thus representing a definitely known date.

Comment #2

Not Agreed. Standard text of an AD states that: “Required as indicated, unless accomplished previously” which gives credit for the SB instructions performed before the issuance of the AD. The instructions of the SB are just an interim solution and the AD requires a repetitive inspection every 3 months.

Comment #3

Agreed. Final AD will be rephrased to reflect the consistency with the SB.

Comment #4

Not Agreed. “Temporary Corrective Action” is the standard text that in EASA view is underlining the overall mandatory actions of this AD.

Comment #5

Agreed. The AD was rephrased to address the moment of the inspection prior to (re)installation.

