COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-086

[Published on 09 June 2016 and officially closed for comments on 07 July 2016]

Commenter 1: Skytraders – Shane Mclauchlan – 14/06/2016

Comment # 1

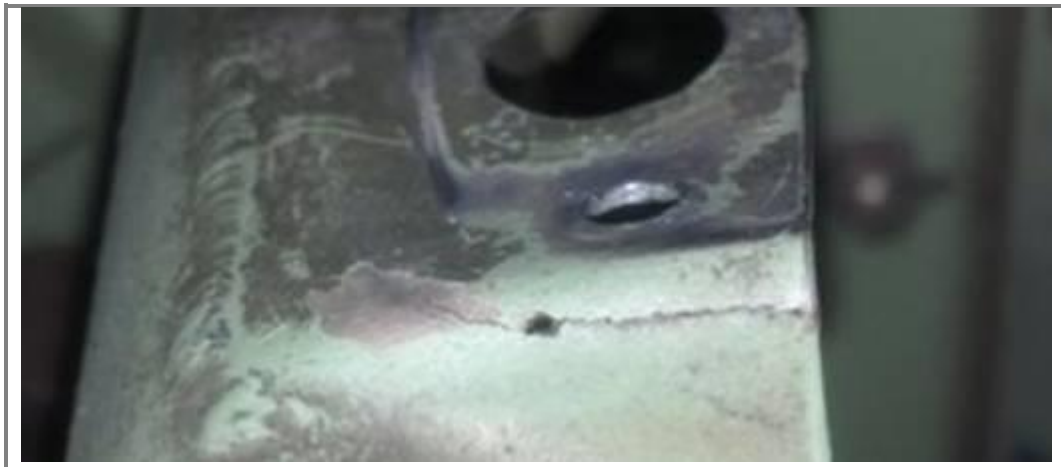
Skytraders operate 2 x C212-EE models in civilian work and wish to provide some feedback regarding this Proposed AD.

The Skytraders C212 aircraft are Post SB 212-27-27 and the initial Inspection of Airbus Military COM 212-0340 was to determine the mod status of the aircraft and if SB 212-27-27 is incorporated.

Once the initial COM Inspection was conducted Skytraders complete repeat inspections of the Rudder pedal mechanism every A Check. Based upon our mod status and findings throughout completing the re-inspection every A Check it is our belief that aircraft safety is maintained with repeat inspections and the Terminating action of SB 212-27-57 should be optional for aircraft with SB 212-27-27 incorporated for operators who wish to discontinue repeat inspections.

With our operation and findings we have not discovered any defects or damage to our installations.

I have attached the Airbus Military COM and photos of the level of damage supplied by Airbus Military when explaining the reason for the inspection several years ago. As the photos indicate the level of damage is extensive and will easily become visible during the repeat visual inspections at A Check intervals prior to the situation becoming a safety issue.



EASA response:

Comment not agreed. A thorough design review accomplished by EADS-CASA confirmed that implementation of a repetitive inspections in accordance with EADS-CASA SB212-27-27 does not provide an equivalent level of safety and therefore does not constitute an Alternative Method of Compliance to the modification of the rudder pedal adjustment in accordance with the instructions of EADS-CASA SB-212-27-0057. Failure to modify the rudder pedal adjustment in accordance with the instructions of EADS-CASA SB-212-27-0057 would reduce the ability of the part to withstand design loads if defects of the welding are present. Additionally, there are not enough data to support a repetitive inspection interval ensuring detection of crack before the affected part failure.

No changes have been made to the Final AD in response to this comment.