



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-152

[Published on 24 October 2016 and officially closed for comments on 21 November 2016]

Commenter 1: Contact Air Technik GmbH – Ludwig Kuehn – 25/10/2016

Comment # 1

ATR issued SB ATR42-25-0191 (currently at Rev. 01 dated 01-Jul2016) and ATR72-25-1157 (currently at Rev. 01 dated 01-Jul2016) entitled Equipment/Furnishings - Captain and first officer seats - Improve horizontal locking system.

Both Service Bulletins have the references to the IPECO SBs No. 063-25-08, No. 063-25-09 and 063-25-10 mentioned in the PAD No.: 16-152 under Ref. Publications. Some operators might have one of the ATR SBs already accomplished until the official AD would be published and therefore they should be listed as alternate compliance for the AD.

EASA response:

Comment partially agreed. Paragraph (1) of the AD requires actions at equipment level, ending with part re-identification. ATR SBs provide instructions to modify an aeroplane, either (a) by replacing affected seats with new (post-mod) seats, or (b) by removing, modifying and re-identifying the affected seats in accordance with the instructions issued by IPECO. When choosing (b), the same instructions (off-aircraft action) as required by the AD are used.

Based on the above, ATR SBs are not an alternative method that – if not quoted in the AD – would require an AMOC to be used as a means to comply with the AD.

EASA agrees that for an aeroplane completely modified (i.e. affected seats no longer installed) in accordance with the instructions of an applicable ATR SB, only paragraph (2.2) of the AD has to be implemented.

A Note has been added to the Final AD in response to this comment.

Commenter 2: ATR Aircraft – Fabien Bourmaud – 17/11/2016

Comment # 2

Please find here below small comment regarding the reason paragraph of the PAD 16-152, indeed in this paragraph is mentioned that burrs on centre track is one of the root cause of an “unexpected seat movement”. This is true, however the design modification proposed does as terminating action of the AD, does not address this root cause.



Indeed the burrs issue occurred on a new seat (not lots of cycles cumulated) and the root cause identified of burrs presence was a quality issue (lack in the IPECO production procedures to check presence of burrs before to release the seat). The root cause is addressed by IPECO since December 2011 by production procedure modification.

Hence we think that mentioning burrs in the paragraph reason is not necessary as the terminating action proposed does not address this specific root cause.

EASA response:

Comment partially agreed. As noted by the commenter, the burrs presence was a contributing factor to the unsafe condition. It is EASA opinion that the AD reason should provide – as far as practical – a complete overview of the event(s) leading to the AD.

AD reason was modified to clarify that improvements in production line also contributed to address this unsafe condition.

