



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-009

[Published on 19 January 2017 and officially closed for comments on 16 February 2017]

Commenter 1: Airtask – Ian Viscogliosi – 20/01/2017

Having reviewed the PAD, we have an operational concern with the 55Hr Compliance Time.

Our DA42M has one of effected serial number gearboxes installed in the LH engine. This aircraft is due to depart the UK for Kenya, to undertake scheduled operations and to return to the UK on the 27th March. With a predicted 140 flight hours. On return to the UK, both engines have been scheduled for replacement due to life ex. In fact both gearboxes were due replacement, but we have elected to replace both engines 90hrs early, to avoid disruptions to the operation.

Therefore, if we have to comply with the 55Hr compliance time, we will be replacing the gearbox again after 85hrs. The SB time of compliance is, next 50 FH or with next maintenance action. Would we be able to comply at “next maintenance action” which would be our scheduled engine replacement?

And to offer some mitigation, it is a twin and only one gearbox is affected. Also as further mitigation we have no signs of leakage.

EASA response:

Comment noted.

To be noted that the SB was issued on 27 January 2016, and the compliance suggested in it refers to that issue date.

EASA has no data supporting a general extension of the compliance time until “next maintenance time”. Anyway, a request for compliance extension without compensating factors, and related to operational needs, may be managed under the provisions of Article 14.4 of the Basic Regulation (see also the FAQ “What is not an Alternative Method of Compliance (AMOC) to an Airworthiness Directive (AD)?” on this [link](#)).

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

