



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-029

[Published on 10 March 2017 and officially closed for comments on 07 April 2017]

Commenter 1: SENASA – Luis del Valle Sánchez – 13/03/2017

Comment # 1

Our Company SENASA has a fleet of about 15 SOCATA TB10 (belonging to group 2 of this PAD).

Some of them have already more than 8000 flight hours or 12000 landings without having installed Kit OPT10911001.

Should we ground the aircrafts with more than 8000 flight hours or 12000 landings until Kit OPT10911001 is installed? Will you consider a limit of time or flight hours or landings for this aircrafts to make the modification?

EASA response:

Comment agreed: A grace period of 50 Flight hours or 75 landings (whichever occurs first) has been added in the AD.

Commenter 2: Frederic Falcon – 13/03/2017

Comment # 2

Would you explain us the compliance time wording "since aeroplane first flight".

It's not easy for a Part-M/F or G to determine the first flight of an old aircraft and potentially causing confusion/uncertainty to AD recipients.

The term "first flight" is more acceptable when the traceability provided by owner/operator/manufacture are strong enough in particular regarding the flight cycles / hours of the aircraft before its delivery.

It could be better to use the compliance from the date of issuance of the original certificate of airworthiness.

It preferable to use the term "total" when referring to flight hours accumulated since the aircraft first flight or the date of issuance of the certificate of airworthiness.

EASA response:

Comment not agreed. The correct starting point is the aeroplane first flight. Flight accomplished before the issuance of the certificate of airworthiness must be



taken into account. The total number of FH and landings (including those accomplished as production flights) should be recorded in aircraft maintenance records. No changes have been made to the Final AD in response to this comment.

Commenter 3: SENASA – Luis del Valle Sánchez – 15/03/2017

Comment # 3

Our Company SENASA has a fleet about 15 SOCATA TB10 (belonging to group 2 of this PAD), some of them with more than 800fh and 12000 lds. We have contacted SOCATA and they may have some production problems to provide Kit OPT10911001 immediately. Will you consider to issue a deviation letter to allow the operation of these aircrafts meanwhile SOCATA is producing the kits? When do you expect this AD will be issued?

EASA response:

Comment noted. SOCATA informed that enough kits OPT10911002 are now available. No changes have been made to the Final AD in response to this comment.

Commenter 4: Ecole Nationale de l'Aviation Civile – Geoffroy Wagner– 31/03/2017

Comment # 4

ENAC (Ecole Nationale de l'Aviation Civile) is operating, for Pilot training purposes, a fleet of 28 SOCATA TB10 (all in Group 2) that have accumulated more than 240000 FH and 692000 cycles on this aircraft type.

The problem described by the SB10-081R2 of SOCATA didn't affect our fleet till today, knowing that the aircraft have between 21000 and 27000 cycles (7500 FH to 9500 FH).

We can understand that some users could encounter cracks on wing front attachments on the wing side, requiring periodic NDT inspections as developed by the SB. But, we think that this inspection, repetitive every 3000 cycles, is sufficient to ensure a high level of safety on the aircraft. The replacement of the part could be linked to the result of the NDT inspection, with a life limit of the wing front attachment at least equivalent to 12000 cycles, which is indeed the limit mentioned for triggering the first inspection of the existing original attach.

It is difficult to admit that the new improved attachments are likely less reliable than the existing one in a ratio of 2/1.

We suggest to adapt the AD, keeping the initial kit installation and the repetitive NDT inspection (3000 cycles is already a conservative interval). But we propose to suppress the requirement in §4 to replace the reinforced front attachment wing on wing side every 6000 cycles. This has no impact on safety but a high economical



impact on the owners.

If necessary, the EASA could keep the opportunity to update this AD by creating in the future a life limit of the wing front attachment. This could be done in light of significant problems, reported during NDT inspections to the manufacturer, according to the SB.

We remain at your disposal for further discussion, focusing only on the safety aspect.

EASA response:

Comment agreed: The periodic replacement is no more mandatory as an inspection solution has been added in the AD. If the user decide to choose this solution, the first inspection is to be performed at 6000 landings or 4000 flight hours (whichever occurs first), then, the subsequent inspections must be performed every 3000 landings or 2000 flight hours. The replacement is mandatory only if a crack is detected during the inspection. The choice to systematically replace or to inspect and if necessary replace is let at the user's convenience.

