



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-143

[Published on 09 October 2017 and officially closed for comments on 06 November 2017]

Commenter 1: Air New Zealand – Martin Brill – 15/10/2017

Comment # 1

We are unable to make informed comment on the PAD 17-143 because we have no record of the stated “published” ATR72 Time Limits Rev 15 document, which has not been released.

Also, in the “Allowed One-time Exceedance of Threshold / Interval: Item (2)” CMR/MSI task references 213100-1 and 213100-2 are not referenced in the current Time Limits Rev 14 or the MRBR Rev 23.

We would like to know if the intent of the PAD 17-143 is to clarify that the ATR 72 Time Limits and the revisions contained in it will be immediately applicable, from the next (imminent) release of ATR72 Time Limits, Revision 15.

We would appreciate your clarification as to the PAD intent and what maintenance tasks the PAD 17-143 applies, so that we are able to make informed comment and decisions.

EASA response: Agreed.

The issue came from the fact that the PAD has been released before the new Time Limits documents. Indeed, ATR needs some time after EASA approval to compute new time limits and new MPD and release them.



Commenter 2: Air Tahiti – Vincent Leclerc – 01/12/2017**Comment # 2**

PAD 17-143 Grace Period for CMR Tasks does not apply to new CMR Task 213100-3 “Functional check of triple indicator” with a Max Interval of 10000FH, whereas new ATR72 MPD Rev.25 OCT17 does not link it to an existing task but to a new task (213183-FUT-10030-1), such as for new CMR tasks 213100-1 (MPD task 213183-FUT-10020-1) and 213100-2 (new MPD task 213183-FUT-10020-2), which are themselves covered by the Grace Period.

Allowed One-time Exceedance of Threshold / Interval:

- (2) For specific CMR tasks, as listed in Table 1 and Table 2 of this AD, a one-time exceedance (grace period) of the applicable threshold is allowed for those aeroplanes that are close to, or have exceeded the applicable threshold, as specified in the TLD.

Table 1 – Grace Period for SSI Task

AWL reference	Compliance Time
572402-1	Within 5 000 FH (Flight Hours) since last inspection accomplished through MRBR tasks ZL-520-01-1 and ZL-620-01-1

Table 2 – Grace Period for CMR Tasks

CMR/MSI task	Compliance Time
213100-1	Within 550 FH or 3 months, whichever occurs first after the effective date of this AD
213100-2	





ATR72 TIME LIMITS CERTIFICATION MAINTENANCE REQUIREMENTS

2. CMR TABLES

	MSI CMR REF.	MSI TITLE AND TASK DESCRIPTION	MAX INTERVAL	EFFECT
	212300	AIR DISTRIBUTION SYSTEM		
N	212300-1	Operational check of overboard valve in venturi position	8000 FH	ALL
N	213100	CABIN PRESSURE AND CONTROL MONITORING		
N	213100-1	Functional check of outflow valves overpressure relief	8200 FH	PRE 5948
N	213100-2		5700 FH	ATR72-212A POST 5948
N	213100-3	Functional check of triple indicator	10000 FH	PRE 5948
N	213100-4	Operational check of ditching system	20000 FH	ALL



ATR 72 MAINTENANCE PLANNING DOCUMENT

REFERENCE (document)	ZONE	DESCRIPTION	THRESHOLD INTERVAL SAMPLE	JOB PROCEDURE	M	M.H	I
1-1 10-07)	210	PRESSURIZATION CONTROL FUNCTIONAL TEST OF EXCESSIVE CABIN ALTITUDE WARNING	I: C	JIC: 213100-FUT-10030	1	0,30	PRE
1-2 10-13)	210	PRESSURIZATION CONTROL FUNCTIONAL TEST OF THE CABIN ALTITUDE PRESSURE MEASUREMENT	I: C	JIC: 213100-FUT-10050	1	0,30	POS
1-1 10-1)	210	PRESSURIZATION CONTROL FUNCTIONAL TEST OF OUTFLOW VALVES OVERPRESSURE RELIEF	I: 8200 FH	JIC: 213100-FUT-10000	1	0,30	PRE
1-2 10-2)	210	PRESSURIZATION CONTROL FUNCTIONAL TEST OF OUTFLOW VALVES OVERPRESSURE RELIEF	I: 5700 FH	JIC: 213100-FUT-10000	1	0,30	POS
1-1 10-3)	210	PRESSURIZATION CONTROL FUNCTIONAL TEST OF EXCESSIVE CABIN PRESSURE DIFFERENTIAL WARNING ***END***	I: 10000 FH	JIC: 213100-FUT-10040	1	0,30	PRE

Comparatively, ATR42-500 PAD 17-142 Grace Period applies to similar new CMR tasks 213100-3A and 213100-3B “Functional check of triple indicator”. Please advise if PAD 14-143 Grace Period could also apply to new CMR Task 213100-3 “Functional check of triple indicator”, some aircrafts having already exceeded the applicable threshold of 10000 FH.

EASA response:

Agreed, a new grace period has to be defined for the CMR 213100-3 with similar grace period (550 FH or 3 month, whichever occurs first). Table 2 should be as below

CMR/MSI task	Compliance Time
213100-1	Within 550 FH or 3 months, whichever occurs first after the effective date of this AD
213100-2	
213100-3	

We have amended the Final AD accordingly.

