



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-154

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Commenter 1: Cityjet – Patrick Ryan – 31/10/2017

Comment # 1

A. Compliance times.

There are two elements to the compliance time issue:

A.1 Compliance with the requirements of the ALS.

A.2 Incorporation of ALS Iss 01 Rev 02 into the airlines AMP.

I. A.1 Compliance with the requirements of the ALS.

The first issue is with the first proposed wording of this paragraph:

Maintenance Tasks and Replacement of Life Limited Parts:

(1) From the effective date of this AD, accomplish the following actions, as specified in the ALS as applicable to aeroplane configuration:

(1.1) Replace each component before exceeding the applicable life limit, and

(1.2) Within the thresholds and intervals, accomplish all applicable maintenance tasks.

Whilst this is currently ok, this will not be actually possible for some future revisions due to the following reasons:

A.1 Threshold periods have already been exceeded:

In a lot of cases, the Threshold period will have already been exceeded (e.g. a draft of Ch04 Rev03 changes 750HR CMR Item 9 changes inspection from 57-71-00-220-805 to 57-71-00-220-808 – as the Threshold for the changed inspection has already been exceeded; SCAC need to be approached for a grace period. Similarly there have been examples of 'new' inspections added with a threshold of 1000FC/1500FH – again a grace period needs to be applied for and applied).

Another example is the proposed introduction of a 43FH CMR Task in Rev 03 of the ALS; again, once this is approved/published operators are immediately beyond the threshold limit.



- II. A.2 Ch04 and the required maintenance instructions are on different revision cycles (i.e. the requested procedure may not be correct / exist).
SCAC issue Ch04 and the rest of the AMM on different cycles – this can result in an AMM reference in Ch04 no longer aligning with the actual AMM reference (or not yet existing).
E.g. At CH04, Rev 02 the AMM procedure for CMR 04-30-00 “FIRE PUSH button, AGENT 1, AGENT 2 button for actuation of fire extinguishing discharge on engine fire protection panels” has been changed from 26-21-00-710-801 to 26-21-00-710-802. This now refers to an incorrect AMM procedure until such time that the full AMM is updated (projected Dec 17).
- III. A.3 Clarification of Ambiguities / Mistakes:
The exact requirement of Ch04 life sometimes require clarification.
For example, in Rev 02 of the ALS, Slat Section 1 Part No. T7.92.3611.000.901.70 has a new life. However this does not actually exist: there is only a T7.92.3611.000.901.70/A, which is lifed. There is also a T7.92.3611.100.901.70/C which is not lifed.
Time is needed to submit & clarify these requirements.
Hence the Compliance Time should allow for:
Request clarification/correction as required.
A period for operators to request & implement grace periods as designated by SCAC.
A period for SCAC to issue, and operators to receive, the correct revision of the relevant AMM accomplishment instruction.
- IV. A.2 Incorporation of ALS Iss 01 Rev 02 into the airlines AMP.
Aircraft Maintenance Programme (AMP) Revision:
(3) Within 12 months after the effective date of this AD, revise the approved AMP, on the basis of which the operator or the owner ensures the continuing airworthiness of each operated aeroplane, by incorporating the limitations, tasks and associated thresholds and intervals described in the ALS, as applicable to aeroplane model and depending on aeroplane configuration.
The compliance time to amend the AMP to reflect ALS Issue 01 Rev 02 as being ‘within one year of the effective date of the AD’ doesn’t make sense, as Iss 01 Rev 03 of the ALS is already in draft, possible to be approved by end of the year (?).
Whilst the AD does allow for subsequent revisions of the ALS to be used, the time limit for incorporating it into the Operators AMP should really move forward also to prevent the AD having to be continually re-issued to reflect the receipt of new ALS revisions.
One possible wording would be:
Within 12 months after the revision date of the ALS ~~effective date of this AD~~, revise the approved AMP.... etc
This should allow SCAC to amend the full AMM (as per point A.2), and for Operators to clarify / incorporate the requirements.



V. B. Credit for the previous covering AD.

EASA AD 2015-0104 mandated Ch04 at Issue 0, Rev 07. Ch04 Issue 1 Rev 02 introduces additional tasks / limitations - however it also deletes safe lives on multiple components, that no longer form part of the ALS.

Hence the statement “For the reason described above, this AD retains the requirements of AD 2015-0104” is not appropriate, as in many cases the requirement has been deleted (specifically table 04-47-00).

Similarly, Section 4 of the AD refers to “the new and more restrictive tasks and limitations” – again this is not correct, as in several cases the restriction has been removed, making it less restrictive obviously.

VI. C. Status of 04-11-00 Service Bulletins

Ch 04-11-00 - LIST OF MANDATORY MODIFICATIONS OF AIRFRAME STRUCTURE AREAS — DESCRIPTION AND OPERATION mandates a number of service bulletins, some of which (e.g. RRJ-53-00277-БД) do not appear to be compiled / approved yet. How have EASA approved a ‘blank list’ of modifications of which the workscope of effectiveness of which cannot be reviewed or evaluated. Also – these have a mandated ‘From’ Operation time limit (a lower limit), which doesn’t really make sense.

VII. D. Evaluation of Maintenance Requirements

How involved are EASA with the content of Ch04, and it’s evolution. For example: CMR 04-30-00 Item 13 ‘Rudder’ used to be a “Removal of the Rudder Actuators for Maintenance ” for “Failure of rudder actuator caused by significant internal leaks”, but has now become “GVI of the Rudder Actuator” for “Detachment of the actuator from the rudder surface”. There are several similar ‘jumps’ in the maintenance requirements (again which can lead to compliance problems, as the threshold of the inspection has been exceeded, but as the requirement has changed, we’ve not actually ever performed the requirement) – have EASA an opinion on this?

EASA response:

- I. Comment understood. EASA will coordinate a possibility to introduce grace periods for new tasks or tasks with reduced intervals in to coming revisions of the Sukhoi ALS document. No changes have been made to the Final AD in response to this comment.**
- II. Comment understood. EASA will encourage Sukhoi to coordinate issuance of the ALS and corresponding AMM. Additionally, EASA will facilitate communication between the operator and Sukhoi to avoid mismatch between Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN, Chapter 04, and the referenced Aircraft Maintenance Manual tasks. No changes have been made to the Final AD in response to this comment.**
- III. Comment understood. See answers to comments I. and II. No changes have been made to the Final AD in response to this comment.**
- IV. Comment noted. According to EASA policy related to AD’s mandating Airworthiness Limitations Sections document, Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN Issue 01 Revision 03 will be mandated by a new AD only in a case it contains more restrictive or new tasks in compare with the Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN Issue 01 Revision 02. The eventual new AD will supersede this AD and the operator will be required to comply with that new AD. In case Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN Issue 01 Revision 03 does not**



include new or more restrictive task, it can be used to demonstrate compliance with the requirements of this AD along with Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN Issue 01 Revision 02. No changes have been made to the Final AD in response to this comment.

- V.** *Comment noted. The expression ‘For the reason described above, this AD retains the requirements of AD 2015-0104’ refers to the nature of the mandated maintenance tasks – i.e. replacements and maintenance actions required by the identified ALS document – and do not refer to particular ALS tasks or list of tasks. No changes have been made to the Final AD in response to this comment.*
- VI.** *Comment understood. See answers to comment I. and II. Additionally, EASA encourages operators to communicate and provide their comments to the type certificate holder at early phase of development of new Sukhoi RRJ-95B MM M7.92.0AMM.004.000.EN. No changes have been made to the Final AD in response to this comment.*
- VII.** *Comment noted. See answers to comment I. and II. No changes have been made to the Final AD in response to this comment.*

