



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-178

[Published on 22 December 2017 and officially closed for comments on 19 January 2018]

Commenter 1: AERUM AVIATION GROUP – Gonzalo Martín – 02/01/2018

Comment # 1

I have been reviewing the PAD 17-178 regarding Tecnam P2006 T rudder trim actuator Airworthiness limitations. We are a CAOMO and 145 repair approved centre. we usually work with this aircraft.

We have one with more than 1000 FH. But this aircraft, in January 2016, changed the rudder trim actuator, At this moment we considered the written Part number as a mistake and it was replaced and currently it has almost 400 hours, considering the FH of this component.

I think, that maybe as we did, some operators also have done the replacement. Therefore, I suggest to include in the final AD, a remark that if you have already done the replacement, you have to count the FH of the component instead of the aeroplane ones. Otherwise following strictly the AD I have to replace the actuator based on Aeroplane FH, although my rudder trim actuator has accumulated in service only 400 Hours, as it was replaced previously. The same could be the case for people changing the component for other reasons.

EASA response:

Comment agreed. It was decided that the FH to be considered are those accumulated by the rudder trim actuator P/N B6-7T since first installation on an aeroplane. In case the total FH are unknown, the FH accumulated by the aeroplane must be used.

The final AD has been amended in response to this comment.

