

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-007

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**Commenter 1: Ministry of Justice of the Republic of Lithuania – Laurynas Naujokaitis – 06/02/2018**

### Comment # 1

*'Reason: Failures of NLG piston tubes P/N 26-8-1408-1 were reported during ground operations. Subsequent investigation determined a deficiency in NLG piston tube manufacturing process. It was also determined that only a specific batch is affected by this defect.'*

Regarding that I got EASA PAD No. 18-007 from the operator of the aircraft, I still don't have additional information from TECNAM. As I understand from this document there are other similar occurrences.

Also I still don't have additional information about „Subsequent investigation” of TECNAM.

*Groups: Group 1 aeroplanes are those that have an affected part installed. Group 2 aeroplanes are those that do not have an affected part installed. Aeroplanes with MSN 1 to 116 inclusive are Group 2 aeroplanes, unless the NLG piston tube was replaced in service. An aeroplane that embodies modification (mod) 2006/323 in production is also a Group 2 aeroplane, provided the aeroplane remains in that configuration.*

As I understand all Group 2 aeroplanes or aircrafts from SN 117 are affected.

Also I have some information that the MTOW increment to 1230 kg has been “included” by the factory on about 100 airplanes (over 230 totally produced), which are the latest ones.

Conclusions:

This all information clearly proves that this is not a deficiency of the NLG piston tube manufacturing process. And EASA PAD No. 18-007 doesn't solve problem essentially.

Also regarding that aircraft has pulled out forward the aircraft centre of gravity, the aircraft can be used on the ground runway and if the aircraft is used for training, the NLG should be strengthened.

Therefore TECNAM should redesign NLG for the aircraft with 1230 kg maximum weight.

**EASA response:**

***Comment not agreed. Four (4) reports of failed NLG piston tubes P/N 26-8-1408-1 during ground operations were received. This led Tecnam to improve the manufacturing process of the NLG piston tubes and those NLG piston tubes are now marked with Mod 2006/323.***

***Any aeroplanes (irrespective of maximum take-off weight) equipped with NLG piston tubes marked Mod 2006/323 are not affected by this unsafe condition.***

***Tecnam also identified the aeroplanes on which pre-Mod 2006/323 NLG piston tubes were installed during production. These aeroplanes (identified in the AD as Group 1, s/n 117 and up) are the ones affected by the replacement requirement of the final AD.***

***For all other aeroplanes (defined as Group 2, particularly s/n 1 thru 116), the only requirement of the final AD is to ensure that no NLG piston tube P/N 26-8-1408-1 pre-Mod 2006/323 is installed.***

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

