



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-037R1

[Published on 06 June 2018 and officially closed for comments on 20 June 2018]

**Commenter 1: Airtask Group – Ian Viscogliosi – 19/06/2018**

### Comment # 1

Having reviewed the EASA PAD 18-037R1, I would like to lodge one objection:

“(2) Within 30 days after the effective date of this AD, accomplish a maintenance records check of the affected part, installed on the aeroplane, to determine whether any previous taper pin(s) replacement or rework has been accomplished on that part.”

I do not understand the logic behind the replacement of the rod. If it has been inspected and found to have no defects and has been in service for years for instance, why replace it?

Also, I am surprised that the inspection interval remains at 1000FH, given that these rods are susceptible to gust damage.

We at Airtask will continue to inspect at ours at 75FH to maintain the safety factor, also the economical impact is minimal.

“SB Follow On Action

At a period not exceeding 1000 flight hours from initial inspection and after every 1000 flight hours following, operators are requested to examine the Rudder Final Drive Rod assembly in accordance with Maintenance Schedule MS1 section 1 page 4 & 5 paragraph ‘C’ Control System Components.”

### EASA response:

**Comment noted. The reason for the replacement of the part, if it is determined that taper pins have been replaced, or rework has been accomplished, is that such actions are likely to degrade the quality (and therefore affect the safety) of the part. This is the conclusion from investigation of certain affected parts, analysis, and risk assessment. The degradation cannot be detected by visual inspection only.**

**The same risk assessment has determined that, provided no taper pins are replaced (an action that the Final AD prohibits), an inspection interval of 1,000 FH is sufficient to detect any defects that may have developed during normal in-service usage, prior to such defects leading to part failure. Inspecting the part at shorter intervals is, of course, perfectly acceptable.**

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



**Commenter 2: Cormack Islander Aircraft – George Miller – 19/06/2018**

**Comment # 2**

Having reviewed the EASA PAD 18-037R1, I would like to lodge the following objections:

“(2) Within 30 days after the effective date of this AD, accomplish a maintenance records check of the affected part, installed on the aeroplane, to determine whether any previous taper pin(s) replacement or rework has been accomplished on that part.”

The logic behind the replacement of the rod seems to be flawed. If it has been inspected and found to be defect free and has been in service for years for instance, why replace it?

A review of the full maintenance records would be required to determine if the taper pins had been replaced back to introduction to service of any particular aircraft. Clarification is required as this task would become too onerous.

“SB Follow On Action

At a period not exceeding 1000 flight hours from initial inspection and after every 1000 flight hours following, operators are requested to examine the Rudder Final Drive Rod assembly in accordance with Maintenance Schedule MS1 section 1 page 4 & 5 paragraph ‘C’ Control System Components.”

If the Rudder Final Drive Rod is found to be unserviceable it is usually down to rudder suffering over movement and would be determined at any subsequent inspection.

**EASA response:**

**Comment noted. See EASA answers to Comment #1 above.**

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

