

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-026

**[Published on 14 February 2019 and officially closed for comments on 14 March 2019]**

### **Commenter 1: Ecole National de l'Aviation Civile – Geoffroy Wagner – 15/02/2019**

#### **Comment # 1**

In order to facilitate the maintenance planning, the repetitive inspection should coincide with the 200 hours check, with the same tolerance of 10 FH / 30 days. The same request was made for AD 2017-0074.

#### **EASA response:**

**Comment agreed. The Final AD has been amended accordingly, introducing a Note: "A non-cumulative tolerance of 10 FH may be applied to the compliance times...etc."**

### **Commenter 2: Airtask Group – Ian Viscogliosi – 15/02/2019**

#### **Comment # 2**

Having read the Diamond Aircraft MSB, it strikes me the failure appears to be fatigue related. Therefore, shouldn't this be a Landing/Cycle interval & not a Flight Hour interval? At one end of the spectrum we have training aircraft & at the other end we have special mission aircraft whereby the FH/LDG ratio is vastly different. Furthermore, there is a 100FH inspection interval to inspect the entire NLG. AMM Ref. 05-28-50, Page 3. Item 9: "Examine the nose landing gear assembly for damage. Look specially for cracks, deformation, wear, corrosion and damaged surface protection."

The definition of "Examine" AMM Ref 05-00-00 Page 4. Para 3: "Examine. To look carefully at an item. It includes steps such as these:

- Make sure that the item:

Is complete.

Is correctly attached.

Has no loose parts.



Shows no signs of leaks.

Is not cracked or damaged.

Is not worn.

- Make sure that:

The surface protection is not damaged.

All locking devices are installed correctly.

- Make sure that items such as pipes and cables:

Look serviceable.

Do not rub against other items.

- For log books and other technical records:

To find outstanding faults.

To make sure they are up-to-date and correctly maintained.”

So, my question is why should this be an AD, when it appears that bad maintenance practices have led to the crack not being detected?

**EASA response:**

***Comment noted. It should be recognised that EASA ADs are not only issued for aircraft registered in Europe (EASA member States), but also to inform the international community (ICAO Contracting States), allowing them to adopt our AD if any affected aircraft are registered.***

***In addition, the Aircraft Maintenance Manual (AMM) is not universally considered to be ‘mandatory’, as it is not formally ‘approved’ and the tasks are subject to inclusion (or not) in the aircraft owner/operator’s aircraft maintenance programme (AMP). The AMP is subject to approval by the State of Registry authority – for which there is no ‘universal standard’ either. Since this particular AMM task is now to be used to correct an unsafe condition, the AD makes the task mandatory and limits the possibility of escalating the AMM specified interval.***

***Finally, in this aeroplane category, flight hours are commonly recorded and used for maintenance intervals, whereas information regarding flight cycles (landings) may not always be available. Basically, the AMM covers the inspection of the NLG, but as limited access to the inspection area might make it more difficult to identify the formation of cracks while the possible consequences of a failure of an attachment bracket might be severe, this failure mode and the area of possible cracks have been made the subject of a Mandatory Service Bulletin, required by EASA AD.***

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



**Commenter 3: Royal Jordanian Air Force – Bater Haquz – 17/02/2019****Comment # 3**

Regarding DA42 NG aircraft which were originally manufactured as "DA42 NG" (not converted), I suggest to state more clearly that the AD is not applicable to them, and mention how this issue was eliminated for these newer models, just to avoid any confusion regarding applicability.

**EASA response:**

***Comment not agreed. The AD positively identifies the aeroplanes that are subject to inspection. Any aeroplane not mentioned is, by default, not subject to this inspection.***

***For your information, the new-manufactured DA 42 NG aeroplanes have a slightly different design definition, where in the potentially affected area, a single metal sheet (10 mm thickness) is installed, instead of 2 sheet metal parts welded together, which is more susceptible to crack initiation.***

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

