

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-069

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Commenter 1: Lufthansa CityLine GmbH – Michael Hermanski – 18/04/2019

Comment # 1

EASA released yesterday PAD 19-069 (ATR) that requires an inspection of oxygen cylinders, having part number (P/N) 89794077. PAD 19-069 references to SAFRAN (AVOX Systems, Inc.) Service Bulletin (SB) 10015804-35-03. Therefore, this SB has to be effective for part number (P/N) 89794077.

Part number (P/N) 89794077 is also part of PAD 19-051R1 (Airbus). But PAD 19-051R1 does not include service bulletin (SB) 10015804-35-03 and its list of effective serial numbers. Since we are talking about a rotatable component it is maybe worth to review both PADs for SB effectivity.

EASA response:

Comment noted.

The list of affected parts (s/n) in both AVOX SBs, SB 10015804-35-01 (identified in AD 2019-0085, previously PAD 19-051R1) and SB 10015804-35-03 is identical, as far as P/N 89794007 is concerned.

The only P/N of those listed in SB 10015804-35-01 eligible for installation on ATR aeroplanes is P/N 89794007. However, the instructions of SB 10015804-35-01 are not suitable for use on ATR aeroplanes. For that reason, a separate 'ATR' dedicated AVOX SB was issued.

The reason for separate AD action (Airbus vs. ATR) is that AVOX does not have a design approval (TSO, ETSO) for these parts. For AD purposes, this means that EASA cannot issue an AD that applies directly to those AVOX parts, but rather an AD that applies to the approved aircraft designs for which the affected parts are eligible for installation.

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

