

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-077

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Commenter 1: Enav – Federico Bagnoli – 31/05/2019

Comment # 1

As you might already know, the TC No. 79 to the AFM has been obsoleted as the new revision of the AFM for Avanti II was issued In the meanwhile.

EASA response:

Comment acknowledged however the wording of the final AD kept unchanged. The AD requires incorporation of the pitot-tube heater operating instructions provided by Piaggio P.180 Avanti II AFM TC No. 79 into the existing AFM by inserting AFM TC No. 79 into the AFM, according to which the operator operates the aeroplane. Paragraph (2) of the AD provides an allowance – an acceptable method – to update the AFM by inserting a later AFM revision which includes the instructions of the Piaggio P.180 Avanti II AFM TC No. 79. It means that one of the safety intent of the AD, i.e. the incorporation of the pitot-tube heater operating instructions into the AFM, may be achieved by two, equally acceptable, ways. Delaying the AD issuance due to additional round of consultation specifying the Piaggio P.180 Avanti II AFM revision incorporating the necessary pitot-tube heater operating instructions and cancelling reference to Piaggio P.180 Avanti II AFM TC No. 79 wouldn't provide any additional safety benefits but delay of actions necessary to restore the airworthiness of the product to the level required by the applicable airworthiness requirements.

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

