

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-155

[Published on 13 August 2019 and officially closed for comments on 27 August 2019]

### Commenter 1: Air Tahiti – Lucien Yau – 14/08/2019

#### Comment # 1

1. In the groups section:

For Group 1, please confirm that the text after the word “provided” refers to the listing of MSN and not to all MSN. See below extract:

**Groups:** Group 1 are ATR 72 aeroplanes, all MSN, except MSN 1433, 1437, 1456, 1463, 1481, 1485, 1493, 1495, 1506, 1511, 1512, 1514, 1515, 1516, 1517, 1518, 1520 and subsequent, provided it has been determined that both main landing gears (MLG) have never been removed from the aeroplane since ATR date of manufacture. Group 2 are ATR 72 aeroplanes, all MSN.

2. In §(4), please precise that the instructions refer to the AMM (JIC) 32-11-00 RAI 10000 advance copy in the AOM.

3. Also in §(4), please precise this instruction is only until the AMM (JIC) 32-11-00 RAI 10000 advance copy is released in the next revision.

#### EASA response:

**1.1. Text after the word “provided” refers to the listing of MSN and not to all MSN.**

**1.2. The §(4) of the AD refers to the AOM, which requires the use of the AMM (JIC) 32-11-00 RAI 10000 provided in advance copy in the AOM.**

**1.3. ATR proposes to EASA to revise the AD when the JIC advance copy will be confirmed incorporated in the next AMM revision for all ATR72 operators (expected for June 2020). The AD revision could remove the paragraph 4 of the AD and the group 2, as soon as ATR will confirm the AMM update.**

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

**Commenter 2: Nordic Aviation Capital – Kim Simonsen – 14/08/2019****Comment # 2**

Nordic Aviation Capital would like to raise awareness regarding above mentioned PAD. We find this PAD unnecessarily complicated for future operations and documentation control, for as well ATR, as Operators & CAMO Departments.

We welcome the intention of the AOM/PAD. Corrections of such potential hazards must at all cost be eliminated. That being said, the wordings chosen in the referenced document is contradicting.

In the 1st part of the PAD (Reason section) it is implied that the intention of the AD is a “one-time inspection”:

**For the reasons described above, this AD requires a one-time inspection of the left-hand (LH) and right-hand (RH) MLG, and, depending on findings, accomplishment of applicable corrective action(s).**

In the 2nd part (Required Actions) it is mentioned that the AOM is to be followed at EACH MLG Removal/Installation.

**(4) For Group 2 aeroplanes: From the effective date of this AD, each MLG removal and installation must be accomplished in accordance with the instructions of the AOM.**

The second part is very unfortunate for all parts involved, as this implies that P145 always THROUGHOUT ETERNITY will have to reference the AOM when performing MLG Removal/Installation. When ATR performs revision changes to the AMM/JIC they will have to carry the revision of the AOM as well, which we find very alarming. If this is the case for future potential incident/accidents, we are on a slippery slope here, introducing “side-documentation/-Instructions” to the mandatory AMM/JIC.

Our recommendation:

Due to the fact that ATR (applied in the AOM, referenced below) already have taken precautionary actions and released a JIC Advanced Copy to the AMM, we find the “one time inspection” to be sufficient.

Ref. AOM: 2019/12 issue 2

**An update of the Job instruction Card (JIC) used to remove and install the MLG has been done to introduce a play check after MLG installation to detect potential improper installation, attached as advance copy to this AOM.**



It can be discussed whether a grace period is needed, until the Advanced Copy is finally implemented in the AMM/JIC next revision.

**EASA response:**

2.

*§(4) of the AD, is related to the accomplishment of the AOM which requires the use of the AMM (JIC) 32-11-00 RAI 10000 provided in advance copy in the AOM. The use of this latest issue of the JIC 32-11-00 RAI 10000, allow us to limit the inspection to a one-time inspection until the AMM will be updated with the last JIC 32-11-00 RAI 10000 for all affected operators.*

*ATR proposes to EASA to revise the AD when the JIC advance copy will be confirmed incorporated in the next AMM revision for all ATR72 operators (expected for June 2020). The AD revision could remove the paragraph 4 of the AD and the group 2 as soon as ATR will confirm the AMM update.*

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

**Commenter 3: Calm Air International LP – Philip Forrest – 14/08/2019**

**Comment # 3**

I am looking for a clarification regarding PAD 19-155 ref ATR AOM 2019/12 issue 2 for ATR72 MLG inspection for Bush PN D61002.

We have MSN 215, 237, 311, 357 and 508 and have previously RAI the gear on all aircraft. No faults were found during the AOM inspection and this was reported to ATR by using the form in appendix 03 of the AOM. The AOM appendix 04 flow chart shows us requiring no further action.

I just want to confirm the interpretation of the PAD and that it is consistent with the intent of the AOM as it is somewhat unclear as to the grouping and the scenario numbers mentioned in the PAD. Note: There is no “credit” (para 5) or “reporting” (para 6) stated for group 2 aircraft in the PAD.

With our fleet as highlighted above, is there any further action required?

**Comment # 4**

I have further discussed the implications of this PAD with my colleagues as it takes into consideration two issues - both the gear inspection issue(Group 1), as well as the AOM advanced copy of the JIC for the Gear removal and installation procedure (Group 2) in paragraph 4 of the PAD.

We have completed the inspection on our ATR72 fleet with no faults. All bushings found to be correctly installed, but even with this inspection completed and compliance documented and relayed to ATR, it appears we are still required to track and document the AD compliance for the same document for any future gear changes because of paragraph 4 of the PAD, even though we would be performing the task IAW the amended JIC? Is this



assessment correct? If so, can we expect that once ATR has indicated the JIC steps have been amended in the AMM to match the advanced copy in the AOM, the AD will be amended negating the necessity to make the AD compliance statement at each gear change?

***EASA response:***

***3. In addition of the one-time inspection requested by the AD, for each next MLG removal and installation, it is required to follow the AOM instruction (part B of the AOM which requires the use of the AMM (JIC) 32-11-00 RAI 10000 provided in advance copy in the AOM).***

***4. ATR proposes to EASA to revise the AD when the JIC advance copy will be confirmed incorporated in the next AMM revision for all ATR72 operators (expected for June 2020). The AD revision could remove the paragraph 4 of the AD and the group 2 as soon as ATR will confirm the AMM update.***

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

