

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-164

**[Published on 04 September 2019 and officially closed for comments on 02 October 2019]**

### **Commenter 1: Flybe Ltd – Bobak Skelly – 04/09/2019**

#### **Comment # 1**

Studying EASA PAD 19-164 and ATR AOM 2019/05 there is conflicting information between documents in reference to the aircraft applicability.

- PAD 19-164 states – All ATR 72 on which ATR mod 01872 and mod 07953 have been embodied in production, whereas;
- AOM 2019/05 states all ATR 72 aircraft pre-mod 07953 except 1513 to 1515, 1527, 1530 to 1553. A note on the AOM states – MOD 07953 has been embodied in production since MSN 1409 (ATR 42) and MSN 1554 (ATR72).

Right now this means the PAD is not applicable but the AOM is applicable to the Flybe ATR 72 fleet.

Please can you clarify which document is correct?

#### **EASA response:**

**Comment agreed**

**EASA Final AD amended accordingly.**

### **Commenter 2: Stobart Air – Kevin Mulligan – 04/09/2019**

#### **Comment # 2**

I have a query in relation to the applicability section on Page 1 of the attached EASA PAD 19-164.

Can you please clarify the following:

If an aircraft is post production mod 01872 only or post mod 07953 only, will the AD be applicable?



**Applicability:**

ATR 42-200, ATR 42-300, ATR 42-320, ATR 42-400 and ATR 42-500 aeroplanes, all manufacturer serial numbers (MSN) on which ATR modification (mod) 01872 and 07953 have been embodied in production; except MSN 1405 to 1408 inclusive and

ATR 72-101, ATR 72-102, ATR 72-201, ATR 72-202, ATR 72-211, ATR 72-212 and ATR 72-212A aeroplanes, all MSN on which ATR mod 01872 and mod 07953 have been embodied in production; except MSN 1513 to 1515 inclusive, 1527, and 1530 to 1553 inclusive.

**EASA response:****Comment noted**

*If an A/C is post mod 01872 and pre mod 07953, the AD is applicable.*

*If an A/C is pre mod 01872 and pre mod 07953, the AD is not applicable.*

*The AD is only applicable to A/C post mod 01872 AND pre mod 07953.*

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

**Commenter 3: InterGlobe Aviation Limited – Saurabh P. Maske – 05/09/2019**

**Comment # 3**

We have reviewed EASA PAD 19-164 R0, it has been observed that applicability given in PAD is not matching with applicability given in AOM 2019/05 Issue 2 dt.21 Aug,2019.

As per EASA PAD, it is applicable to ATR72-212A all MSN on which ATR mod 01872 and mod 07953 have been embodied in production, except MSN 1513 to 1515 inclusive, 1527, and 1530 to 1553 inclusive.

However as per AOM 2019/05 Issue 2, it is applicable to all ATR 72 aircraft pre-MOD 07953 except MSN 1513 to 1515, 1527, 1530 to 1553.

**EASA response:****Comment agreed.**

*All ATR72 have been delivered as post mod 01872 therefore the applicability is identical.*

*AOM 2019/05 revised to be in line with the EASA Final AD.*

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



**Commenter 4: Stobart Air – Kevin Mulligan – 05/09/2019**

**Comment # 4**

I have one additional query in relation to EASA PAD 19-164 Pg.2 Step 1 of the required action . Can you please clarify if the highlighted text below is correct? Should this read 'whichever occurs first' instead of 'whichever occurs later'.

Modification:

(1) Within 24 months or 5 000 flight hours, whichever occurs later after the effective date of this AD, modify the electrical wiring routing installation on both engine nacelles in accordance with the instructions of the applicable SB.

**EASA response:**

**Comment agreed.**

*The highlighted text is correct. The purpose of this wording is to allow all operators to perform this corrective action during A/C heavy maintenance check (C check, whose interval is 5000FH).*

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

**Commenter 5: ATR – Koshal Malla – 05/09/2019**

**Comment # 5**

I think there is an error on the applicability of the PAD 19-164.

The applicability section for both ATR42 and ATR72 should read “mod 07953 have NOT been embodied”.

**EASA response:**

**Comment agreed**

**EASA Final AD amended accordingly**



**Commenter 6: Nordic Aviation Capital – Kim Simonsen – 06/09/2019****Comment # 6**

Nordic Aviation Capital would like to address the contradicting applicability information found in the EASA PAD 19-164 vs ATR AOM 2019/05 Issue 2. If not corrected, the applicability will have the exact opposite outcome than what was intended by ATR.

**EASA response:**

**Comment agreed**

**EASA Final AD amended accordingly**

**Commenter 7: Bangkok Airways Plc.– Sutthipath Thongsotseang – 06/09/2019****Comment # 7**

According to AOM 2019-05, Pre- MOD 07953 is applicable to ATR72 but for PAD 19-164, Embodies of MOD 07953 on aircraft will applicable to ATR72 which mean Post MOD 07953 is applicable to ATR72.

**EASA response:**

**Comment agreed**

**EASA Final AD amended accordingly**

