

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-056

[Published on 25 March 2020 and officially closed for comments on 22 April 2020]

### Commenter 1: DAT Group – Martynas Liaugaudas – 14/04/2020

#### Comment # 1

As per PARA (1) DVI has to be performed within 24 months after the effective date of AD. It seems that AD will be assign to heavy maintenance check ( 2 YE ). The part of operators are having ATR aircrafts in heavy maintenance right now. If AD was released it might had effective date very close to any aircraft's heavy maintenance release date.

For example: AD has effective date 2020-05-01, aircraft is planned to be released from heavy maintenance 2020-05-05. If operator determines that they have affected parts installed before aircraft release from heavy maintenance - it might be a challenge to perform inspection SBs 53-0151 or 53-1108 on time, due to specific tool needed (approx. 35 lead time from ATR). If A/C is released from heavy maintenance on 2020-05-05 then inspection has to be performed within 2020-05-01. (This might become even bigger gap when operators have to perform 2 YY interval heavy check earlier due to AD inspection).

Since those inspections requires a huge amount of man power, facilities, access and etc. – the best opportunity to perform this is during heavy maintenance.

I would suggest to apply Threshold “within next planned 2 YY interval heavy maintenance visit after effective date of AD” or similar. Or you might have a better application for Threshold to make possibility for owners / operators to perform within next heavy maintenance 2 years interval check.

#### EASA response:

Comment understood. The Compliance Time (CT) for inspection has been extended in the final AD from 24 to 26 months without impacting the safety margins. This extension should allow operators concerned by this kind of situation (heavy check very close to AD effective date) to schedule AD accomplishment at the next heavy maintenance check opportunity, without exceeding this new AD CT.

***We have amended the Final AD accordingly***