

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-083

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Commenter 1: Wilco Air – Monique Hoogeslag – 20/05/2020

Comment # 1

We have taken notice of PAD 20-083 and wonder if the description of the “applicability” can be changed.

Reason for change request: Unnecessary paperwork. if described this way, we have to change the AD status of **ALL** balloons in maintenance, although this AD is only relevant for the balloons with the specified burner.

Suggestion: Applicability: "All balloon types and models, as specified in the referenced TCDS and Specific Airworthiness Specification (SAS) listed above, all serial numbers **if equipped with a Stratus double burner**"

Explanation: We had the same (in our option useless) extra paperwork overload with AD 2019-0245 in which "all balloons types and models" where applicable, and in fact less than 1% of the balloons in our maintenance had the Schroeder burner. We would not have had all this extra paperwork if the specification had been more specific by adding just the type of burner. Example: " Alle balloon types and models *if equipped with a Schroeder Fire Balloons burners FB6 or FB7*"

FYI Example correct description in: AD 2016-0151 "Applicability: All balloon types and models, as specified in the referenced TCDS listed above, all serial numbers, *if equipped with a Kubiček Burner with fuel hoses made of "EGEFLEX" material.*"

As paperwork is increasing, and not always contributing to the aim of EASA (safety), I wonder if this PAD 20-083 “applicability” can be simplified to avoid unnecessary workload.

I hope this information helps to simply the procedure and do look forward to your reply.



EASA response:

Comment not agreed. The affected burners and associated hangers can (and in fact are) easily move from one balloon to another; that is the main reason why the final AD has such a wide Applicability.

For the balloons that have an affected burner installed: corrective actions, are required. For those that do not: no corrective action, but preventive action (§§ 6 and 7) required, in case one is about to be installed. Only 'serviceable' parts, as defined in the AD, can be installed.

If the AD would apply only to those that have the affected parts installed (i.e. those needing corrective action), the 'prohibition' requirements (§§ 6 and 7) would not work: the AD would not apply to the balloon, so requirements about installation would not apply, either.

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

