

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-119

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**Commenter 1: Company name N/A – A. Garside – 03/09/2020**

### Comment # 1

The technical content of PAD 20-119 Schempp-Hirth Duo Discus Glider ATA 27 – Flight Controls Airbrake End Stop Bushings Replacement and TM 396-20 is not correct for early s/n designs.

My Duo Discus s/n 25 does not have two plastic bushings on the end stops of each airbrake, it has one metal stop on each airbrake.

The stated reason for the TM/PAD is that on specific versions the grey plastic bushings can have age related damage which could cause the airbrakes paddles to become interlocked at very high speeds. The overlap of the upper and lower paddles of my Duo Discus is 8mm twice the minimum of 3-4mm. The single metal end stop on each airbrake of my Duo s/n 25 is not damaged or deformed and could not possibly suffer the problems described in the TM/PAD. This raises the question that the TM/PAD cannot be correct for my glider. The stops in fact are never used in flight as the wheel brake mechanism limits the airbrake first. They are there as a backup or if the wheel brake mechanism is faulty.

This makes it impossible for me to comply with this PAD/AD/TM and the working instructions issued by Schempp-Hirth.

My Duo Discus is now 26 years old and in that time there has been no degradation at all of the existing airbrake stop system.

I request an AMC, Alternative Means of Compliance, that I need not take any action with regards to the PAD and forthcoming AD due to the different design of stop installation fitted and that it cannot suffer the age related damage referred to in the PAD/AD/TM.

I have also contacted the manufacturer Schempp-Hirth about this.

### EASA response:

**Comments partially agreed. No AMOC application is necessary. The TN has been revised to include instructions for an inspection of the airbrake metal stops and the necessary changes have been included in the revised PAD.**