

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-199

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Commenter 1: Azul Linhas Aéreas Brasileiras – Ronaldo Sérgio Lucas Ferreira – 18/12/2020

Comment # 1

My comment concerns the grace period of new CMR tasks 612000-13 and 612000-15 of EASA PAD 20-199. According to TLD revision 18, ATR proposes:

SECTION	REV CODE	ITEM APPLICABILITY	GRACE PERIOD
2-2	N	CMR 351000-1	Within 750 FH or 4.5 months since revision letter date of this TLD, whichever occurs later
2-2	N	CMR 612000-13	Within 1000 FH since revision letter date of this TLD, without exceeding the interval currently specified in the MAR20 MRBR revision for task 612000-20 (5000 FH)
2-2	N	CMR 612000-15	Within 1000 FH since revision letter date of this TLD, without exceeding the interval currently specified in the MAR20 MRBR revision for task 612000-22 (5000 FH)

As it is too difficult to control the grace period proposed by ATR, AZUL proposes to change the grace period as follows:

CMR 612000-13

For those operators who have already complied with MRBR task 612000-20 at least once:

- Within 1000 FH since the effectivity date of the AD, or 1000 FH since last compliance of revision for MRBR task 612000-20, whichever occurs later.

For those operators who have never complied with MRBR task 612000-20:

- Within 1000 FH since the effectivity date of the AD.

CMR 612000-15

For those operators who have already complied with MRBR task 612000-22 at least once:

- Within 1000 FH since the effectivity date of the AD, or 1000 FH since last compliance of revision for MRBR task 612000-22, whichever occurs later.



For those operators who have never complied with MRBR task 612000-22:

- Within 1000 FH since the effectivity date of the AD.

AZUL have many ATR aircraft that have already complied with MRBR task 612000-20 and MRBR task 612000-22 in the last 6 months, and we think there are other operators in the same position. As a result of our proposal, we guarantee that this grace period will be easier to control and comply with.

EASA response:

Comment noted. The grace periods are defined taking into account the safety aspects, considering a potential one-time exceedance of a mandatory maintenance action. One time extension of the compliance time as required by an AD (including grace periods) can be granted, under EU rules, by the responsible national authority. The operator may contact the responsible national authority and apply for a temporary exemption in accordance with Article 71 of the Basic Regulation. A justification document from the type certificate holder may be suitable to support such a time limited exemption on a case by case basis.

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

