

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-001

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Commenter 1: Cat Aviation AG – Pierre Baumann – 13/01/2021

Comment # 1

As per paragraph “Applicability,” the upcoming AD may be effective on Falcon 2000EX series s/n 333 through s/n 362 (inclusive). As a Swiss based operator, we are operating Falcon 2000EX s/n 340 and s/n 347 (known as Falcon 2000LXS) and therefore requirements of this future AD will be applicable to our tails.

While reviewing the paragraph “Required action(s) and compliance time(s),” sub-paragraph “Replacement,” “Table 1 – Replacement” requirements, the corrective actions for Falcon 2000EX series must be done before exceeding 74 months or 3750 FC since aeroplane first flight, as follows:

Required Action(s) and Compliance Time(s):

Required as indicated, unless accomplished previously:

Replacement:

- (1) Within the compliance time defined in Table 1 of this AD (see Note 1 of this AD), as applicable, replace each affected part with a serviceable part in accordance with the instructions of the applicable SB.

Table 1 – Replacement

Aeroplane Type	Compliance Time (whichever occurs first)
Falcon 7X	Before exceeding 98 months or 4 000 flight cycles (FC)
Falcon 900EX	Before exceeding 74 months or 3 750 FC
Falcon 2000EX	

Note 1: The calendar time and FC specified in Table 1 of this AD are those accumulated by the aeroplane since its first flight.

However, the documentation received during airplane delivery is definitely not recording the “aeroplane first flight” and therefore, the calendar due date for AD requirements might be very difficult to define.

However, I assume that the overall intent is to perform the required corrective actions during a significant or “major” maintenance ground time to avoid any extra-grounding. On the Falcon 2000EX series, it must be noted that the “major” airframe inspection (so-called “C-inspection”) is due every 72 months (+2 months tolerance) or 3750 FC, whichever occurs first.

The “C-inspection” schedule as well as the workscope are clearly defined in Falcon 2000EX Maintenance Planning Document.

The date of origin for this “C-inspection” is given by Dassault Aviation and properly recorded in the airplane log-book, as follows:

Falcon 2000EX s/n 340 log-book extract

Falcon 2000EX SN 340

This aircraft has been maintained in accordance with the Manufacturers recommended maintenance procedure for aircraft under POA Manufacturing / Completion process. “The Date of origin for AMM Chapter 5 maintenance cycles: «Basic» «12M or 800FH» « 24M or 1600FH », « 36M or 2400FH » 28 January 2019. The date of origin for “C” Inspections as defined in Falcon 2000EX AMM Chapter 5, is to be reckoned from 04 September 2018. The date of origin for factory-installed landing gear as defined in Falcon 2000EX AMM Chapter 5 is to be reckoned from 04 October 2018

28 Jan 2019

Current log book completed with the total of (33) Thirty Three hours, and (20) Twenty minutes of production time and total of (12) Twelve landings has been completed in Little Rock, Arkansas on 28 January 2019.

R. Buena

Production Organization Approval
EASA Part 21 No. FR.21G.0006

Falcon 2000EX s/n 347 log-book extract

Falcon 2000EX SN 347

This aircraft has been maintained in accordance with the Manufacturers recommended maintenance procedure for aircraft under POA Manufacturing / Completion process. “The Date of origin for AMM Chapter 5 maintenance cycles: «Basic» «12M or 800FH» « 24M or 1600FH », « 36M or 2400FH » 26 September 2019. The date of origin for “C” Inspections as defined in Falcon 2000EX AMM Chapter 5, is to be reckoned from 03 April 2019. The date of origin for factory-installed landing gear as defined in Falcon 2000EX AMM Chapter 5 is to be reckoned from 03 May 2019

26 Sep 2019

Current log book completed with the total of (43) Forty Three hours, and (35) Thirty Five minutes of production time and total of (16) Sixteen landings. Has been completed in Little Rock, Arkansas on 26 September 2019.

R. Buena

Production Organization Approval
EASA Part 21 No. FR.21G.0006



Therefore, to avoid any questions or confusions on defining the AD due date, it would make more sense if “Compliance Time” of Table 1 is referred to this “C-inspection” (e.g. “no later than first C-inspection”, or a similar statement).

To my knowledge, the same can be done for Falcon 900EX series and Falcon 7X series (to be confirmed).

EASA response:

Comment noted but not agreed. Considering that:

- 1. The “C letter check” may be implemented by some operators using different “letter” designations, with consequent different content and/or interval. For example, for a theoretical operator, the C-check can cover the weekly check, or any other maintenance check, and the maintenance check due within 72 months can be marked (e.g.) as “L-check”; and**
- 2. Based on the NAA-approved aircraft maintenance programme (AMP), the “C letter check” may be differently defined than in the MRBR/MPD recommendation provided by Dassault in terms of flight hours or flight cycles (FC) values. EU regulation (Part M) requires operators to follow only ALS intervals. All other MRBR/MPD recommended intervals, determined based on MSG3 analysis, can be escalated in a manner approved by NAA based on the operator’s reliability programme which forms part of the approved AMP.**

Therefore, for the purpose of this AD, it is necessary to determine the threshold for accomplishment of the replacement in unambiguously defined calendar time and FC. The starting point for threshold counting – the first flight – can be obtained either from the manufacturer of the aeroplane, or established based on the EASA Form 52 issue date (Aircraft statement of conformity).

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

