

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-006

[Published on 29 January 2021 and officially closed for comments on 26 February 2021]

Commenter 1: SuperJet International – Sergio Quenqua – 11/02/2021

Comment # 1

With reference to the PAD in subject, please find my comments below:

1. *This PAD does not contain any instruction for the reconfiguration of aircraft with SoD ADs, AD 2020-FATA-0102A-04 and/or AD 2020-FATA-01020A-15 have already been embodied. In this case the necessary action to reconfigure the aircraft will be managed by the operators, /.../ the AD should also indicate what to do. This could be covered adding a Group 3 aircraft referring to aircraft with the mentioned AD already embodied.*
2. AMM task descriptions are reported in the correct English language; however, the AMM English version currently issued by the TCH is the following:
 52-11-25-710-801 “Operational Test of the Snubber of the Emergency Power Assist System of the Forward (Aft) Entry Door”
 52-12-25-710-801 “Operational Test of the Snubber of the Emergency Power Assist System of the Forward (Aft) Service Door”
3. Another SoD AD, AD 2021-FATA-0102A-01, has been currently published on the same subject. It is currently available in Russian language only. The English translation recalls the SoD ADs, AD 2020-FATA-0102A-04 and AD 2020-FATA-01020A-15. In my interpretation, AD 2020-FATA-01020A-15 is not applicable to my fleet because the referred ADs are not adopted by EASA .
 However, formally speaking, at this moment the instructions provided by this SoD are in place until a “not adoption” AD will be published by EASA. I expect this SoD AD will be not adopted by EASA in the near future.

EASA response:

1. ***Comment noted. Aircraft configuration and definition modified in accordance with the Russian Federation AD 2020-FATA-0102A-04 and/or AD 2020-FATA-01020A-15 requirements have never been approved by EASA. As such no aeroplanes registered in a member state of the European Union may have been modified without affecting the status of their individual certificate of airworthiness. In addition, EASA received confirmation from the Type Certificate Holder that no EU-registered RRJ-95 aeroplanes are currently in-service, except those that are used for flight test purposes by the Type Certificate Holder. For those reasons no change was made to the final AD.***



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

2. Comment noted and agreed.

The final AD was amended accordingly.

3. Comment noted and agreed. EASA confirms that after 45 days after its publication AD 2021-FATA-0102A-01 is still unavailable in a language other than the Russian language. EASA has not been able to receive to date official data from the authority of the State of Design regarding that latest AD. It is EASA's understanding that AD 2021-FATA-0102A-01 is a follow-up of previously released FATA ADs on the very same topics. For that reason and unless EASA's understanding is proved to be erroneous, the EASA final AD is amended to indicate that it supersedes FATA State of Design AD 2020-FATA-01020A-03, AD 2020-FATA-01020A-04 and AD 2020-FATA-01020A-15 and AD 2021-FATA-0102A-01.

The final AD was amended accordingly.

