

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-039

[Published on 09 March 2021 and officially closed for comments on 06 April 2021]

**Commenter 1: Federal Aviation Administration – Jim Rutherford – 05/04/2021**

### Comment # 1

- A. The reference publication for the EASA PAD is TECNAM SB 398-CS Ed. 2, original issue dated 05 August 2020. The PAD also states that ‘the use of later approved revisions or editions of the above-mentioned document is acceptable for compliance with the requirements of this AD.’ Currently, on the TECNAM website, the version of SB 398-CS that is available is Ed. 2, Rev. 1 dated 17 August 2020. Can EASA please confirm that you have no technical objection to the use of the later service information, SB 398-CS, Ed. 2 Rev. 1 dated 17 August 2020, to comply with the actions in the EASA PAD.
- B. Within the US regulatory system, 14 CFR 91.409(b) allows the 100hr inspection requirement to be exceeded by no more than 10hrs as an operational flexibility. This operational flexibility would be eliminated by an AD with a hard 100hr requirement. Does EASA have a technical objection to the FAA allowing this 10hrs flexibility in the AD?
- C. Currently, the FAA notes that TECNAM has released a new version of the P2012 AMM, Ed. 4, Rev. 0 dated 19 March 2021. This new revision has added a new Airworthiness Limitation (ALS) for the inspection of the elevator trim tab surface free play every 100 hours. It is referenced to a Chapter 55-20 procedure, however, that section contains several other items without any specific task numbers. Per ATA convention, elevator and elevator trim controls should be in Chapter 27-30, whereas the elevator structure is in Chapter 55. In addition, the new ALS requires the trim tab surface free play to be measured but has no requirements for the actuator as required by the EASA PAD and Tecnam SB. The detailed AMM procedures for the checks are incomplete and lack many details, steps, special tooling and all illustrations contained in the SB. With the release of this new AMM, does EASA plan on incorporating this latest ALS information into their compliance for the PAD Required Actions?

### EASA response:

- A. **Comment noted. EASA have no technical objection to the use of the later service information, SB 398-CS, Ed. 2 Rev. 1 dated 17 August 2020, to comply with the actions required by the Final AD. Reference to the latest SB revision has been added in the Final AD.**
- B. **Comment noted. EASA has no technical objection to the FAA allowing this 10hrs flexibility in their AD. That flexibility has also been introduced in the Final AD.**



**C. Comment partially agreed. EASA will request TECNAM to improve the ALS, in order to better specify the steps to be performed.**

**The amended task of the ALS is expected to be as indicated below.**

55-20	Elevator trim tab surface and actuator trim tab, when applicable	212-55-20-5000-001/002 212-27-30-0410-000	Inspection for free Play (Refer to ATA 55-20)	100 FH
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**No changes have been made to the Final AD in response to point C. of this comment.**

**Commenter 2: Cape Air/Nantucket Airlines – Jeffery M. Schafer – 06/04/2021**

#### **Comment # 2**

**Introduction** – Cape Air and Nantucket Airlines are operated by Hyannis Air Service, Inc., a Massachusetts corporation headquartered on Cape Cod in Hyannis, Massachusetts, USA since 1989. Our airline organization operates and maintains a fleet of 99 aircraft: 75 Cessna 402C, 20 Tecnam P2012 and 4 Britten-Norman BN2B-20. We are Tecnam’s launch customer for the P2012 and we have partnered with Tecnam in the continuous enhancement of the aircraft since our first delivery in 2019. We have contractually committed for an additional 10 Tecnam P2012 aircraft to be delivered in 2021.

**Comments** – The Tecnam mechanical trim actuator having basic part number 212-27-30-0410-000 has been revised from the original design. Incorporation of Tecnam MOD2012/157 or Tecnam SB444 improves the mechanical trim actuator by replacing the seegers with ring nuts. This change renders portions of SB398 edition 2 obsolete; specifically the method of servicing the actuator described in the corrective action section of PAD 21-039. We have incorporated the initial and repetitive inspection intervals along with the criteria to discard ‘out of tolerance’ parts as described within Tecnam SB398 edition 2 into our maintenance program. If PAD 21-039 is published as is without revision, we will be unable to comply as SB398 edition 2 does not include the current version of mechanical trim actuator part number 212-27-30-0410-000.

Tecnam issued edition 4 of P2012 AMM on March 19, 2021. The Airworthiness Limitations Section was revised to include an ‘inspection for free play’ of the ‘elevator trim tab surface’ at each 100 flight hours. ATA section 55 was also amended at this edition to include inspection techniques and servicing requirements for actuators at MOD2012/157 or SB444.

We respectfully suggest that the publications referenced in PAD 21-039 be revised to incorporate current service information for all variants of part number 212-27-30-0410-000.

**EASA response:**



***EASA partially agreed. The Final AD applies to certain aeroplanes with a mechanical trim actuator assembly (P/N 212-27-30-0410-000) installed, regardless of its configuration. EASA have requested TECNAM to amend the Job Card 1249 specified in SB 398, which has been confirmed as accomplished.***

***Paragraph (3) of the Final AD has been amended in response to this comment, by removing the reference to “install compensation rings”, replacing this with “accomplish the applicable corrective action(s)”.***

