

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-044

[Published on 18 March 2021 and officially closed for comments on 01 April 2021]

**Commenter 1: Icarus Aerotechnics – Laurent Palumbo – 25/03/2021**

### Comment # 1

Following this PAD issuance on 18th of March, we would like to make some important comments and remarks on the corresponding SB after trying to apply it on aircrafts. You will find here after our remarks linked to each chapter of the SB 55-005:

- A. SB chapter 1.C.(3).(a): Why this first 1 month limit? All aircraft are grounded during COVID pandemic crisis, 100H (or eventually less). Hourly limit should be sufficient, no? Due to this crisis, almost all European aircrafts (France, Italy, Germany, Spain,...) are not flying, **they cannot fly to us and we cannot go to them.**
- B. SB chapter 1. C.(3).(b): Each 100 FH, why do PILATUS ask to remove and reinstall bolt in self-locking anchor nuts, reducing each time their efficiency, with the risk to become out of limit?
- C. SB chapter 2.D. Material: Bolt P/N 113.30.06.021: we have observed several manufacturing problem damaging thread, and difficulty to screw the nut. One claim has been submitted to PILATUS on this matter.
- D. SB chapter 2.D. Material: Bolt P/N 113.30.06.022:
  - a) BURR: we have observed several manufacturing problem damaging thread and difficulty to screw the nut.
  - b) LENGTH: this bolt is very similar (same length) to a AN4-11. Previously bolt installed was one AN4-10A, why not replacing it with a AN4-10 (see comment just after on bolt 932.19.21.108).
  - c) Different bolts have been found in the same lot.
- E. SB chapter 2.D. Material: Bolt P/N 932.19.21.108: this bolt is indicated equivalent to AN4-13 replacing the previous bolt AN4-13A. OK.
- F. SB chapter 2.D. Material: Nut 938.08.46.103: this nut is a castle nut. Nut 938.08.71.204: this nut is a self-locking castle nut. Why PILATUS did not choose the same type?
- G. SB chapter 2.D. Material: Anchor nut 938.42.15.301: this anchor nut is not dimpled, how do you recommend to install it on the leading edge skin with countersink rivets 939.27.81.006?



- H. SB chapter 3.E.(3).(a): What is the importance of the type of the anchor nut self-locking material? PC-6 AMM chap 55-21-11 do not mention any mounting difference depending on the self-locking material. Where is the coherency between all documents?
- I. SB chapter 3.E.(3).(a).3: We have some cases with negative X distance on metal stop: confusion is possible.
- J. SB chapter 3.E.(3).(c).2: If nylon stop, PILATUS asks to remove grease from the bolt threads, but the anchor nut threads can be full of grease, as it was requested by PC-6 AMM 55-21-11? How to remove it?
- K. SB chapter 5.B.(1).(e): PC-6 SRM clearly mention NO REPAIR possible on elevator and rudder leading edge. We consider than cutting one 90mm hole in this leading edge is comparable (perhaps worst) to one repair in term of remaining mechanical resistance of the skin.
- L. SB chapter 5.B.(2).(a): Note indicates the flanged bush can in some cases remain attached with only TWO rivets. This note has been added by PILATUS after a remark from us reminding that old style configuration exists with only 4 rivets and not 6. IS IT REALLY SAFE? SAFER THAN BEFORE? WE DON'T THINK SO.

**EASA response:**

**A. Comment not agreed. The possible COVID pandemic circumstances do not need to be covered by an AD, as they typically differ in each country and evolve with time. In general, for aircraft not in operation, no AD needs to be complied with until (just before) release to service after parking/storage. When an aircraft is taken from parking or storage and the AD compliance time has expired, an application for a specific Permit to Fly (and corresponding EASA approved flight conditions) should be made, to allow a ferry flight to a maintenance facility where the AD requirements can be accomplished.**

**As all other comments (B. to L. inclusive) are addressed to the SB, not to the PAD, EASA has notified these to Pilatus for disposition.**

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

