

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-066

[Published on 25 May 2022 and officially closed for comments on 22 June 2022]

Commenter 1: Schempp-Hirth Flugzeugbau GmbH – Joachim Krauter – 30/05/2022

Comment # 1

TN 396-21 and TN 890-17 does not introduce a fundamentally new inspection task or any new inspection intervals, but gives additional information for an existing inspection task.

The additional information is contained in the maintenance information SHK-M-01-22. TN 396-21/ TM 890-17 prescribes to add this maintenance information to the maintenance instructions of the individual aircraft in a one-time process.

The latter should be considered as terminating action.

EASA response:

EASA partially agrees. Incorporation of the maintenance tasks detailed in SCHEMPP-HIRTH FLUGZEUGBAU GmbH SHK-M-01-22 into the (powered) sailplane's approved Aircraft Maintenance Programme (AMP), which is approved by the competent authority of the state of registry, can serve as an administrative method of compliance with the requirement of the AD after which it is not necessary that accomplishment of an individual action is recorded for demonstration of AD compliance on a continued basis.

However, recording accomplishment of the individual inspection to maintain the current status of compliance with the AMP (as required by ML.A 305(d)(3) or M.A.305(c)(3), as applicable) is still required by Regulation (EU) No 1321/2014. Therefore, EASA disagrees to specify in the AD that incorporation of the maintenance tasks detailed in SHK-M-01-22 into the AMP is a terminating action.

The wording of the Final AD has been amended to provide an option to revise the AMP by incorporating the tasks detailed in SHK-M-01-22 which allows to close the record in the AD status report (part of the continuing airworthiness record system) for the AD, indicating that the AD requirements are incorporated in the AMP.

Commenter 2: Luftsport-Club Interflug Berlin e.V. – Mathias Simon – 30/05/2022**Comment # 2**

The AD introduces additional inspection requirements on the airbrake system in accordance with Schempp-Hirth TN within 12 months or during the next annual inspection and thereafter at intervals not to exceed 12 months. This is understandable.

However, as the AD has no terminating action, the accomplishment of the AD need to be checked every time during the ARC inspection. This puts additional burden to the inspectors, as they may have to check a long list of ADs.

Therefore, it would be preferred that the AD includes a terminating action instructing to revise the AMP to incorporate the instructions of the AD. Consequently, after revising the AMP it is not necessary that accomplishment of individual action (additional inspection requirements of the airbrake system) is recorded for demonstration of AD compliance on a continued basis.

Since such course of actions are acceptable for the commercial aviation, why should it not be possible for the General Aviation too?

EASA response:

EASA partially agrees; See the EASA answer to Comment #1 above.

