

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-131

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### Commenter 1: Regional Express Pty Limited (Rex) – Richard Taylor – 31/10/2022

#### Comment # 1

Regional Express Pty Limited (Rex) is a Saab 340 operator in Australia operating 61 340A & 340B aircraft. Our Saab 340 fleet currently operates approx. 62,000 FH and 65,000 FC per annum.

Rex supports the EASA proposal to issue an airworthiness directive (AD) that would require compliance with Saab Service Bulletin (SB) 340-27-131 ICE SPD Cancel Logic but is requesting EASA consideration of a longer timeframe for the AD compliance for several reasons.

1. The lead time for parts, Rex has sourced quotations for the parts required to carry out the Service Bulletin and certain items (relay module and wire) are being quoted with a 16-18 week lead time. Rex understands that Saab is also advising that part procurement will be a challenge for the required modification due to the impact of the COVID-19 pandemic.
2. Rex does not have any operational history of the problem experienced (ICE SPD triggered stall warnings on landing) that is behind the reason for the ICE SPD cancellation modification. This is due to the local environment in Australia including runway lengths and ambient temperatures.
3. The COVID-19 pandemic has impacted engineering resources across a wide range of stakeholders meaning that taking on additional maintenance activity for a modification such as the ICE SPD cancellation modification puts additional unnecessary pressure on these already strained resources.
4. The size of the Rex fleet (61 aircraft) means that compliance within a 2 year timeframe as proposed, taking into account the lead time for parts and impact to engineering resources, will be impossible to achieve.

As stated Rex is supportive of the proposed AD but strongly requests EASA consideration of a longer compliance timeframe.

#### EASA response:

**Comment not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter. The State of Registry can grant individual (temporary) exemptions on the Final AD compliance time. No changes have been made to the Final AD in response to this comment.**

