

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-005

[Published on 17 January 2023 and officially closed for comments on 14 February 2023]

Commenter 1: United Arab Emirates – Ayman Wagdy – 19/01/2023

Comment # 1

Except for units listed in Table 3 of SIL 3450003X-XX-26-01, we understand units P/N 34500037-3 or P/N 34500038-3 which have been overhauled by a Meggitt MRO shop, or Meggitt Authorized Repair shop, are unaffected by this PAD. Also, new units P/N 34500037-3 or P/N 34500038-3 which have not been previously installed and have never been overhauled are also unaffected by this PAD.

Having said that, please note the wording of the PAD does not cover for the following scenarios:

- a) Units P/N 34500037-3 or P/N 34500038-3 which were installed on the aircraft as **Original Equipment** and never been removed till date.
- b) Units P/N 34500037-3 or P/N 34500038-3 which were installed on an aircraft as **Original Equipment** but were swapped or robbed for any reason without visiting any MRO for overhaul.

According to our understanding, units mentioned in above items (a) and (b), remains unaffected by the PAD but the TEXT does not explicitly state that in writing.

To support the case, please note SIL 3450003X-XX-26-01 states the following in the **Introduction** section:

“B. Fire Extinguishers installed on the aircraft as Original Equipment are not affected and have been charged at the correct Nitrogen Charge Pressures.”

EASA response:

Comment agreed. The definition of ‘Serviceable part’ has been amended accordingly.



Commenter 2: All Nippon Airways Co., Ltd – Hideyuki Kimura – 10/02/2023**Comment # 2**

I have an inquiry about the serviceable part defined in EASA PAD 23-005.

- A. In the Definitions, serviceable part is defined as Meggitt (formerly Pacific Scientific Company) fire extinguishers having P/N 34500037-3 or P/N 34500038-3 and which have been overhauled by a Meggitt MRO shop or Meggitt Authorized Repair shop, except parts listed in Table 3 of the SIL; and fire extinguishers having P/N 34500037-3 or P/N 34500038-3 that are new (not previously installed) and have never been overhauled.

On the other hand, in Ref. Publication Meggitt SIL 3450003X-XX-26-01 original issue noted that error of the nitrogen pressure chart was already corrected in CMM 26-23-71 rev.4 and CMM 26-23-72 rev.5 and 6.

So we believe that that fire extinguishers having P/N 34500037-3 or P/N 34500038-3 and which have been overhauled I.A.W. CMM 26-23-71 rev.4 and later revision or CMM 26-23-72 rev 5 and later revision can be treated as serviceable part even if the fire extinguishers have not been overhauled by a Meggitt MRO shop or Meggitt Authorized Repair shop.

Please confirm that our understanding is correct. If it is correct, please add the fire extinguishers having P/N 34500037-3 or P/N 34500038-3 and which have been overhauled i.a.w. CMM 23-23-71 rev.4 and later revision or CMM 26-23-72 rev 5 and later revision to the serviceable part. If our understanding is incorrect, please provide us with the reason.

- B. In the Definitions, serviceable part is defined as Meggitt (formerly Pacific Scientific Company) fire extinguishers having P/N 34500037-3 or P/N 34500038-3 and which have been overhauled by a Meggitt MRO shop or Meggitt Authorized Repair shop, except parts listed in Table 3 of the SIL. So we believe that part listed in Table 3 of the SIL can be treated as serviceable part if the part is overhauled i.a.w. the corrected CMM. Please provide us with the reason of this exception.

EASA response:

- A. Comment partially agreed. The use of the corrected CMMs revisions is a condition which is sufficient but which is not required. The use of former CMM revisions did not systematically lead to incorrect pressures levels. This is the case of all the MEGGITT MRO shops and MEGGITT Authorized repair shop: despite their use of former CMM revisions, all were using the correct data, except for 1shop, which resulted in the 4 affected S/N identified in the Table 3 of the SIL. See also EASA answer to Comment #1 above.**
- B. Comment partially agreed. The reason for the 'exception' is that the parts listed in Table 3 of the SIL are KNOWN to have been overhauled by a Meggitt MRO, but incorrectly, and there is a specific compliance time for the corrective action. These parts remain affected parts until AFTER the corrective action – see paragraph (3) of the AD. The definition of 'Serviceable part' has been amended accordingly.**

