

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-030

[Published on 07 March 2023 and officially closed for comments on 21 March 2023]

Commenter 1: Calm Air International LP – Justin Hatch – 07/03/2023

Comment # 1

I am looking for some clarification on PAD 23-030 affecting the ATR 42 and 72 regarding what constitutes an affected part. The PAD lists an affected part as, "Battery toggle switch Functional Item Number (FIN) 7PA, having Part Number (P/N) E0062C1A4AC0A or P/N 845UN01A4AC0A which has been previously installed on an aeroplane (not new)". Does this mean that any time the battery toggle switch 7PA is removed for any reason that it must be replaced? If there is a situation where the switch is removed from an aircraft for troubleshooting reasons, we would not be allowed to re-install that switch on the same aircraft it was just removed from? Any clarification you can provide on this would be greatly appreciated.

EASA response:

Comment noted. Removal of an affected part from an aeroplane and subsequent reinstallation of that affected part on the same aeroplane, accomplished during a single maintenance visit, is not considered as 'install'. The Final AD has been amended accordingly to clarify this issue (see the Definition of the affected part and Note 1).

Commenter 2: Air New Zealand – Peter Taylor – 09/03/2023

Comment # 2

Please find attached some feedback comments on PAD 23-030 Electrical Power – Direct Current Emergency Electrical Network:

1. Para (5) "For Group 1 and Group 2 aeroplanes: Within 30 days after the effective date of this AD, amend the applicable AFM by inserting a copy of the OEB..." - Although the AFM contains EASA approval, OEB's are not published here.
2. Para (5) "...inform all flight crews, and, thereafter, operate the aeroplane accordingly." - The ATR FCOM contains the OEB procedures. ATR QRH OEB Proc N°: OEB 56/3 also requires amendment.



3. Para (6) "Within 12 months after the effective date of this AD, modify the aeroplane in accordance with the instructions of the SB." - 12 months is not sufficient for operators to embody terminating action. Equivalent level of safety is maintained by para (1) to (4) for unmodified aircraft. Global demand for kits will be significant. Previously, global supply of the switch 7PA, has been very limited. A minimum compliance time of 30 months will enable operators to embody at next heavy maintenance visit (2-year interval). Amount of access is significant and testing of systems is appropriate for heavy maintenance visits.
4. Para (7) "...amend the applicable AFM of that aeroplane in accordance with the instructions of the SB..." - ATR72-24-1032 does not contain direct instructions to amend the AFM. 2021-0120-E para (1) required the AFM amendment.
5. Para (9) "...the OEB can be removed from the AFM of that aeroplane." - As per para (5) OEB 56 is contained in the FCOM and QRH.

EASA response:

1 & 2. Comments noted. The paragraph (5) in the Final AD has been amended to clarify the required action.

3. Comment disagreed. The available data does not support the extension of the compliance time. No changes have been made to the Final AD in response to this comment.

4. Comment agreed. The paragraph (7) in the Final AD has been amended accordingly.

5. Please refer to response 1 & 2.

Commenter 3: Emerald Airlines – Dave Gow – 14/03/2023

Comment # 3

The Emerald Airlines team have recently attended an ATR Webinar regarding the rectification of the issues identified in EASA AD 2021-0120-E and have reviewed the proposed airworthiness directive No: 23-030.

We have concerns regarding the PAD, in particular, the safe and practicable implementation of the corrective actions outlined in the document.

We feel the requirement to update the AFM and MEL as each aircraft is modified, which also involves amending our flight crew procedures, adds risk to our operation.

We currently have a fleet of 14 aircraft, (of which all are affected), and it will be impossible to modify the entire fleet within a short period of time. As such, our flight crew would be constantly exposed to operating under different procedures for modified and unmodified aircraft adding complexity and possible confusion during operations, especially if electrical failures were encountered.



Our proposal would be to apply a more holistic and safe approach to the implementation of the AD and update our manuals and procedures when our entire fleet has been modified. This would protect our crew from the risk identified above.

As such, we feel operators should be given the option to either implement the process as it is currently stated in the PAD, or as we have proposed above.

EASA response:

Comment disagreed. EASA considers that the amendment must be performed concurrently with the modification of an aeroplane, as the aeroplane must be operated according to the applicable procedure. No changes have been made to the Final AD in response to this comment.

Commenter 4: Tarom – Diana Isaila – 16/03/2023

Comment # 4

The first requirement of PAD 23-030 is for all ATR operators to amend AFM within 30 days after the effective date of the AD by inserting OEB 56 Issue 3. Question: Most airlines have EFB and amending a manual implies to modify the pdf format of AFM received from ATR. Is it allowed for an operator to modify a pdf manual issued by ATR? Is there any regulation regarding update of manuals in electronic format, issued by the manufacturers?

EASA response:

Comment noted. It is expected that the TC holder will provide the operators with all relevant documentation, including the relevant pdf formats. The execution of AD requirements is outside EASA's jurisdiction, and in case of doubt, the competent local National Aviation Authority should be contacted. No changes have been made to the Final AD in response to this comment.

Commenter 5: Tarom – Roberto Lucian Avram – 29/03/2023

Comment # 5

With regards to PAD 23-030 and AOM 2021/05 issue 6 we noticed one fact and have two questions.



First of all the idea to replace battery toggle switch 7PA every time it is removed is not ok. For example if the entire 29VU panel is removed for any other reason not related to 7PA, it cannot be reinstalled without replacing 7PA.

Now the questions:

- How the corrective action (MOD 10367) takes effect if after the embodiment, the 7PA prohibition still exists? If the a/c is post MOD 10367 and the battery toggle switch is removed for any reason why is still an affected part?
- Besides that, why the pre MOD 05948 a/c are affected by the prohibition of 7PA reinstallation?

EASA response:

Comment noted. An affected part is a battery toggle switch (BTS) 7PA P/N E0062C1A4AC0A or P/N 845UN01A4AC0A, which has been installed on another aeroplane. The purpose of the prohibition is to address the issue coming from the possible interchangeability of BTS between aeroplane models, as the BTS P/N is identical. After modification embodiment (mod 10367), there is no more degradation of BTS for the modified aeroplane configuration, but it could be possible to install another BTS coming either from another aeroplane or from spares stock that could have been damaged by its previous use. Consequently, the installation prohibition is needed. Please, also refer to EASA response to Comment #1.

