

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-129

[Published on 25 October 2024 and officially closed for comments on 22 November 2024]

**Commenter 1: Canaryfly – Miguel Martínez de Lahidalga M. – 27/10/2024**

### Comment # 1

After the review of PAD 24-129, we noticed that, despite ATR72-212A is listed in the applicability of the PAD, it is not listed in Group 1/2 effectivity. Would you kindly confirm?

#### Applicability:

ATR 42-400 and ATR 42-500 aeroplanes, all manufacturer serial numbers (MSN), except those on which ATR modification (mod) 10469 has been embodied in production; and ATR 72-101, ATR 72-102, ATR 72-201, ATR 72-202, ATR 72-211, ATR 72-212 and **ATR 72-212A** aeroplanes, all MSN, except those on which ATR mod 10453 has been embodied in production.

#### Groups: Group 1 aeroplanes are:

ATR 42-400 and 42-500 all MSN which do not have ATR mod 05948 embodied.

ATR 72-101, ATR 72-102, ATR 72-201, ATR 72-202, ATR 72-211 and ATR 72-212, **all MSN which do not have ATR mod 05948 embodied.**

#### Group 2 aeroplanes are:

ATR 42-400 and 42-500 all MSN which have ATR mod 05948 embodied.

ATR 72-101, ATR 72-102, ATR 72-201, ATR 72-202, ATR 72-211 and ATR 72-212, all MSN which have ATR mod 05948 embodied.

### EASA response:

**Comment # 1 agreed. ATR 72-212A has been added to Group 1 and Group 2 aeroplanes definitions.**



**Commenter 2: Emerald Airlines – Dave Gow – 07/11/2024****Comment # 2**

Emerald Airlines would request that EASA review the timeline of the implementation of the EASA PAD No. 24-129.

The Emerald Airlines FLT Ops Department have recently conducted a consultation with ATR regarding the above PAD and the associated ATR FLT Ops Information Message, (attached), FOIM\_2024\_13\_TLU\_logic\_improvement.

We have concerns regarding the timing of the release of the AD and the release of the Electronic Checklist (ECL), applicable to the modifications documented in the PAD. According to ATR and their FOIM, (attached), the ECL associated with the MOD will not be ready until Q4 2025. If this is the case and the AD is released this upcoming December, there is the possibility that we may have to operate some of the aircraft in the fleet with multiple unusable checklists associated with the modification.

We would request that EASA considers the safety impact that this may have on flight crew, who will be operating the ATR with 21 unusable electronic checklists and the confusion this may cause during abnormal or emergency situations.

We would request an extension to the timeframe for implementation of the AD from 12 to 18 months or to delay the release of the AD. This additional time would allow ATR to prepare the new ECL and ultimately assist operators in safely and efficiently implementing these changes.

***EASA response:***

***Comment # 2 not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.***

***EASA remind the commenter that ECL are not EASA approved; primary source of information is the EASA approved AFM.***

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

