

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-129R1

[Published on 10 December 2024 and officially closed for comments on 03 January 2025]

**Commenter 1: Bangkok Airways Public Company Limited – Anurak Tongpoonkij – 13/12/2024**

### Comment # 1

Regarding PAD 24-129R1 for ATR aircraft which is required to do the modification per SB within 1 year for Group 2. 10 of Bangkok Airways aircraft are in Group 2.

This modification is replacing electrical module and wire routing which is required hangar slot and it is about 30 man hours. So in 1 year, we cannot make the hangar schedule for all aircraft to do this modification.

Our comment is to extend the compliance deadline to 24 months for Group 2. FYI, we have been operating this ATR fleet for 10 years and have never experienced any issues similar to those stated in the AD.

### **EASA response:**

***Comment #1 not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.***

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

**Commenter 2: Bangkok Airways Public Company Limited – Nopparut Jarusomboon – 11/12/2024**

### Comment # 2

I would like to inquire about the compliance time for PAD 24-129R1, which refers to AOM 2024/09 and SB ATR72-27-1077. The compliance time for aircraft in Group 2 is quite short, as the SB requires 45 MH for each aircraft. This means that it will be difficult for us to perform the task in line maintenance, and it may only be possible during base maintenance or when the aircraft is in the hangar for C-Check. Could you kindly consider extending the compliance time for aircraft in Group 2?



***EASA response:***

***Comment #2 not agreed – see reply to Comment #1.***

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

