

EASA PAD NO 05-014
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
TCDS	The list of DGAC TC and TCDS is: HR100/R1000 series: TC 61, TCDS 131 HR200/R2000 series: TC 70, TCDS 143 There is no DGAC TC 50 for Robin aeroplanes. We propose deletion of the reference to TC 50.	DGAC	15/11/05	Noted. TC50 is listed in the EASA list of transferred EU products for the R2160 (Aerobatic). This error will be revised in addition to the AD.
TCDS	Remove TC50, Apex does not recognize it.	APEX	15/11/05	See above.
TCDS	The AD refers to "TCDS EU TC61, TC70 and TC50". Mentioning both TCDS and TC in a single statement without the correct and complete numbers or the originating NAA's name could be confusing. DGAC TC N°61 (TCDS 131) and N°70 (TCDS 143) are the correct references. The fact that the French original TC's are now the official EU-accepted documents does not alter the fact that these are still DGAC documents. French (DGAC) TC N°50 is the one for the Reims F337 aircraft, now (about to be) transferred to Cessna under FAA TC Nr.A23EU. Given the AD contents, this TC reference is probably in error?	CAA-NL	14/11/05	See above.
Applicability	The correct Model designation is "HR 100-285", without the "TIARA", which is a trade designation, not listed in the TC(DS). The correct Model designation is "R 2100 A" rather than R 2110 A". Models R 2160 and R 2120 U are not listed. I	CAA-NL	14/11/05	Noted. R2160 was listed in the PAD. To avoid further confusion the original text taken from the CAA AD will be revised to include all HR100/R1000 and HR200/R2000 series.

	can imagine that the Model R 2120 U, having been certificated quite recently, 18 May 2001, is not affected by this directive, but the R 2160 (14 June 1977) surely is?			
Manufacturer	CEA is listed under the manufacturers. Our records indicate that Centre Est Aeronautique changed its name to (Société des) Avions Pierre Robin in 1969. The affected type certificates were issued in July 1971 and September 1973, respectively. It is therefore unlikely that any of the affected models bears a dataplate with "CEA" as manufacturer.	CAA-NL	14/11/05	Agreed. No change required.
Compliance	Flight hours are irrelevant to this AD as proposed. Remove references in paragraphs (i) and (ii), and 6, to 1000 hours.	APEX	15/11/05	Agreed. For simplicity the 1000 hour check was included in line with the manufacturer's maintenance schedule and the original CAA AD. Nonetheless, EASA concur in this case that the flight hour limits are superfluous for the corrosion driven inspection requirement of this directive. The AD will be revised accordingly.
Remarks	Please add these references for APEX information: http://www.apex-aircraft.com/en/support/support-nav.php {English} http://www.apex-aircraft.com/support/support-nav.php {French}	APEX	15/11/05	Noted. The AD will be revised accordingly.
Applicability	The current TC Holder's Maintenance Manual for HR200/R2000 contains provisions for corrosion inspections which are deemed acceptable (see today's Apex Aircraft comment to this PAD for details). Therefore we propose revising the applicability to exclude HR200/R2000 series aeroplanes which individual maintenance programme is	DGAC	15/11/05	Partially Agreed. The intent of this comment will be incorporated in the AD by amending the compliance paragraph to ensure the maintenance programme is acceptable and that accomplishment of certain inspections has occurred (see below).

	based on the manufacturer's Maintenance Schedule Issue 3 dated October 1998 or later revision.			
Applicability	APEX insists that this PAD applies only to the HR100 series and R1000 series, because these models do not have maintenance schedules requiring this detail of inspections. The HR200 and R2000 (EU TC70) series have maintenance schedules which have the following guidance : In the HR200/R2000 MAINTENANCE SCHEDULE, Issue 3 dated October 1998, we find on page 14, line 57-02, Remove inspection panels, wing tips, wing root fairings to enable internal wing inspection, every 500 hours, and every three years, on page 14, line 57-03, check wing structure round landing gear attachment bolts (loose rivets, distorsion (sic), cracks, corrosion), every 1000 hours, and every 3 years, on page 23, line 32-10, Detailed examination for the main landing gear housing, of the fixing bolts and structures round about (loose rivets, corrosion, wear areas...), every 2000 hours, and every 6 years. Line 32- 09 at this same interval, is "Remove Landing Gear" [lines 32-08 , at 1000 hours and 3 years, call for visual inspection of the landing gear attachments, without removal. Corrosion near the spar would be detected at this time.] These routine inspections will detect corrosion in	APEX	15/11/05	Partially agreed. EASA agree that the referenced manufacturers schedule for HR200/R2000 maintenance addresses the level of initial inspection required by the AD. Part M is not yet fully implemented throughout the member states for this class of aircraft, nor is the Agency Opinion 04/2005 revising M.A.302 of Annex I to Commission Regulation (EC) No 2042/2003. This revision will ensure maintenance programmes take into account new and/or modified maintenance instructions promulgated by the Type Certificate holder. For these reasons the manufacturer's maintenance schedule may not be followed in the maintenance programme for all aircraft. In particular it should be established whether the requirement to remove the undercarriage has been accomplished. The AD will be revised to address this point according to the proposal above.

	this series of aircraft. Applicability should then be corrected.			
General	For the HR100 and R1000 series (EU TC 61), we agree with this PAD.	APEX	15/11/05	Noted
Type Approval Holder's Name	replace by "Apex Aircraft"	DGAC	15/11/05	Partially agreed. "Aircraft" will be added to "Apex"