

**European Aviation Safety Agency**  
**Continuing Airworthiness of Type Design Procedures**

<b>EASA PAD N0 05-012</b>				
<b>COMMENT RESPONSE DOCUMENT</b>				
<b>PAD / DOC PARAGRAPH COMMENTED</b>	<b>COMMENT / PROPOSAL</b>	<b>AUTHOR OF THE COMMENT</b>	<b>DATE OF COMMENT</b>	<b>PCM RESPONSE</b>
TCDS	The AD refers to "TCDS EU TC45" and "CDN No 34". Mentioning both TCDS and TC in a single statement without the correct and complete numbers, and without mentioning the originating NAA's name could be confusing. DGAC TC N°45 (TCDS 121) and N°34 (TCDS 100) are the correct references.	CAA NL	14/11/2005	The EU TC number is a valid reference for transferred products. Data for these APEX products is under revision in the EASA databases. The references to TCDS will be clarified.
Compliance	Rollason Aircraft and Engines have ceased trading.	De Havilland Support	19/10/05	EASA concur that "Rollason Aircraft and Engines Ltd" no longer exists. The AD will be revised to state that approved parts should be fitted and that parts previously fitted in compliance with the CAA AD constitute an acceptable means of compliance.
Compliance	The AD specifies the option to install "new steel plates to be obtained from Rollason Aircraft and Engines Ltd". I have been unable to find the name of this company in the current listing of "approved organisations", publication CAP 475, as issued by the CAA-UK.  Either the company still exists and is authorized to produce such parts and in that case, may I suggest that you detail the company's address and telephone/fax/e-mail etc. in the remarks section of the AD; or, if the company no longer exists, possibly the parts may still be used, but can obviously no longer be "obtained from". In the latter case, the wording of paragraph c) need amending.	CAA NL	14/11/05	see above

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Type/Model designation(s)	<p>States "All Robin DR series", but the TC's listed below are only N°45 for the DR300/DR400 series and N°34 for the DR200/250 series. If this AD is supposed to be applicable to "All" DR series (not just those built by Robin), it would seem that the following TC's should also be listed:</p> <p>(1) DGAC TC N°6 (TCDS 34) for the Models DR 100, DR 105, DR 1050 and DR 1051;  (2) DGAC TC N°40 (TCDS 111) for the Models DR 220, DR 220 A, DR 220 AB, DR 220 B, DR 221 and DR 221 B; and  (3) DGAC TC N°42 (TCDS 115) for the Models DR 253 and DR 253 B.</p> <p>Even though APEX is no longer TC holder for the above types/models, I would assume that the same unsafe condition affects these aircraft?</p>	CAA NL	14/11/05	<p>DGAC have since clarified that APEX is TC Holder for the DR253 and DR220 series. The applicable TC No and TCDS Number will be included in the AD.</p> <p>DR 100, DR 105, DR 1050 and DR 1051 are Jodel series aircraft and are addressed by PAD 05-013.</p>
Ref. Publications	<p>It would appear that the proposed AD, although addressing a confirmed unsafe condition, does not meet the criteria as stated in Regulation EC 1702/2003, Part 21A.3B, paragraph (c)1. This requires the approval (TC) holder to "propose the appropriate corrective action or required inspections, or both, and submit details of these proposals to the Agency for approval". As the AD does not contain any reference to a APEX/Robin Service Bulletin or similar publication, may we assume that the TC holder has not developed the appropriate corrective action? If so, does the absence of such an "approved corrective action", in light of the current wording of Part 21A.3B, allow the Agency to issue an AD?</p>	CAA NL	14/11/05	<p>Part 21A.3B paragraph (c)1 identifies the responsibilities of the TCH only. It does not constrain the Agency should that information not be provided. Where the TC holder has not developed appropriate corrective action, as was the case here, the Agency can take action it deems appropriate based on any other information. (Paragraph 2.2.5 of EASA Continuing Airworthiness of Type Design Procedures refers)</p>
General	<p>This AD is fine in principle but needs the following corrections.</p>	APEX	14/11/05	Noted

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Compliance	Apex believes this process should be repeated at the 6 year inspection interval (Section 27 in the maintenance schedule). We contend that corrosion hidden against the wood longeron could not advance to a dangerous condition quicker than six years. Corrosion on the exposed parts will be detected at the 100 hour and 1 year inspection of the stabilator attach parts, as shown in MAINTENANCE SCHEDULE DR400/ALL TYPES, p. 19, Section 55, line 03. Were any of the several occurrences unsafe within six years of new delivery?	APEX	14/11/05	Not agreed: EASA policy is for maintenance programmes to control corrosion within reasonable levels between inspection intervals. The affected aircraft are all over 24 years old and of a design susceptible to corrosion. General experience of corrosion control programmes has shown that for areas of aircraft structure susceptible to corrosion an inspection period of six years is often inadequate to meet the objectives of the programme. Corrosion on the hidden surfaces of the plate will not be detected by normal maintenance. EASA therefore proposes to retain the CAA UK AD interval of three years. For the new anodised components that have not been shown to be susceptible to corrosion no additional inspections will be required.
Compliance paragraph c)	c) ...anodised aluminium replacement parts 34.11.06.000 supplied by Apex Aircraft...	APEX	14/11/05	Agreed. Reference to part number will be included
Compliance Paragraph e)	e) ... have been replaced >< in accordance with paragraph (c). [Remove "by steel plates"]	APEX	14/11/05	Agreed. The CAA directive applied to older types and the later anodised parts are not considered to be a concern if properly maintained according to the manufacturer's requirements.
Ref. Publications:	Due to the simplicity of this compliance, Apex will issue no special documentation. The DR400 Maintenance Manual covers the appropriate detail.	APEX	14/11/05	Noted
Remarks	Contact information for Apex Aircraft is available at <a href="http://www.apex-aircraft.com">www.apex-aircraft.com</a>	APEX	14/11/05	Contact information will be included in the AD