

EASA PAD NO 05-017
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE																
Manufacturers:	Piper Aircraft Corporation (full name of original manufacturer)	CAA NL	09/12/05	AD will use full name, and The New Piper Aircraft, Inc. is added.																
Applicability:	<p>The proposed text appears to have been copied from the Piper Service Bulletin No.327. It would be preferable, given the complexity of the Piper s/n “system” and the several changes thereof over the years, to either state “all serial numbers” for each affected model, or quote the serial numbers as listed in FAA AD 70-26-04:</p> <table><tr><th>Model</th><th>Serial Numbers</th></tr><tr><td>PA-28-140</td><td>28-20001 through 28-26946; and 28-7125000 through 28-7725290</td></tr><tr><td>PA-28-150, PA-28-160</td><td>28-03, 28-1 through 28-4377; and 28-1760A</td></tr><tr><td>PA-28-180</td><td>28-671 through 28-5859, 28-7105001 through 28-7205318, 28-E13, and 28-7305001 through 28-7505260.</td></tr><tr><td>PA-28S-180</td><td>28-671 through 28-5859, and 28-7105001 through 28-7105234.</td></tr><tr><td>PA-28-235</td><td>28-10001 through 28-11378; and 28-7110001 through 28-7210023</td></tr><tr><td>PA-28R-180</td><td>28R-30001 through 28R-31270; and 28R-7130001 through 28R-7130013</td></tr><tr><td>PA-28R-200</td><td>28R-30482, 28R-35001 through 28R-35820, 28R-7135001 through 28R-7135104; and 28R-7235001 through 28R-7635545</td></tr></table>	Model	Serial Numbers	PA-28-140	28-20001 through 28-26946; and 28-7125000 through 28-7725290	PA-28-150, PA-28-160	28-03, 28-1 through 28-4377; and 28-1760A	PA-28-180	28-671 through 28-5859, 28-7105001 through 28-7205318, 28-E13, and 28-7305001 through 28-7505260.	PA-28S-180	28-671 through 28-5859, and 28-7105001 through 28-7105234.	PA-28-235	28-10001 through 28-11378; and 28-7110001 through 28-7210023	PA-28R-180	28R-30001 through 28R-31270; and 28R-7130001 through 28R-7130013	PA-28R-200	28R-30482, 28R-35001 through 28R-35820, 28R-7135001 through 28R-7135104; and 28R-7235001 through 28R-7635545	CAA NL	09/12/05	<p>Partially agreed.</p> <p>The serial numbering is complex. Proposed text followed UK CAA AD. FAA AD applicability not wide enough. EASA AD will be simplified to “all serial numbers”.</p>
Model	Serial Numbers																			
PA-28-140	28-20001 through 28-26946; and 28-7125000 through 28-7725290																			
PA-28-150, PA-28-160	28-03, 28-1 through 28-4377; and 28-1760A																			
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PA-28R-200	28R-30482, 28R-35001 through 28R-35820, 28R-7135001 through 28R-7135104; and 28R-7235001 through 28R-7635545																			

	PA-32-260	32-03, 32-04, 32-1 through 32-1297, and 32-7100001 through 32-7800008			
	PA-32-300	32-15, 32-21; 32-40000 through 32-40974; and 32-7140001 through 32-7940290			
	PA-32S-300	32S-15, 32S-40000 through 32S-40974, and 32S-7140001 through 32S-7240137.			
	In this case, I have taken the liberty to “expand” the applicability to include serial numbers in addition to those mentioned in the FAA AD for the selected models.				
Compliance:	<p>The AD does not contain requirement instructions on what (or within what time after detection) to do when cracks are found. Replace before further flight? Replace with an identical part or improved (ref. SL 576) part? After replacement with an “improved part”, does the inspection interval remain unchanged?</p> <p>If the replacement task is explicitly included, it might be considered to change the title/subject of the AD accordingly:</p> <p>Structure – Balance Weight Tube – Inspection/Replacement</p>		CAA NL	09/12/05	<p>Partially agreed.</p> <p>Actions in case of discovering cracking would follow the procedure according to SB No. 327. The tube must be replaced in these circumstances and the AD will be clarified to this effect.</p> <p>The inspection interval remains unchanged subject to further FAA action or more data becoming available.</p> <p>The replacement is not a terminating action, so the title subject does not warrant change.</p>