

**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 border="1" data-bbox="394 740 981 1455"> <thead> <tr> <th data-bbox="394 740 551 772">Model</th> <th data-bbox="557 740 981 772">Serial Numbers</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 777 551 836">PA-28-140</td> <td data-bbox="557 777 981 836">28-20001 through 28-26946; and 28-7125000 through 28-7725290</td> </tr> <tr> <td data-bbox="394 841 551 900">PA-28-150, PA-28-160</td> <td data-bbox="557 841 981 900">28-03, 28-1 through 28-4377; and 28-1760A</td> </tr> <tr> <td data-bbox="394 904 551 1027">PA-28-180</td> <td data-bbox="557 904 981 1027">28-671 through 28-5859, 28-7105001 through 28-7205318, 28-E13, and 28-7305001 through 28-7505260.</td> </tr> <tr> <td data-bbox="394 1032 551 1091">PA-28S-180</td> <td data-bbox="557 1032 981 1091">28-671 through 28-5859, and 28-7105001 through 28-7105234.</td> </tr> <tr> <td data-bbox="394 1096 551 1155">PA-28-235</td> <td data-bbox="557 1096 981 1155">28-10001 through 28-11378; and 28-7110001 through 28-7210023</td> </tr> <tr> <td data-bbox="394 1160 551 1283">PA-28R-180</td> <td data-bbox="557 1160 981 1283">28R-30001 through 28R-31270; and 28R-7130001 through 28R-7130013</td> </tr> <tr> <td data-bbox="394 1287 551 1455">PA-28R-200</td> <td data-bbox="557 1287 981 1455">28R-30482, 28R-35001 through 28R-35820, 28R-7135001 through 28R-7135104; and 28R-7235001 through 28R-7635545</td> </tr> </tbody> </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>
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Compliance:	<p>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.</p> <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? 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>						