

EASA PAD NO 05-018
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) and (presumably) The New Piper Aircraft, Inc.	CAA NL	09/12/05	Accepted. Both names will be incorporated in the PAD.
Applicability:	As we do not hold a copy of the Piper SB No.1131, we cannot determine whether ALL the version of specific models are affected, or only the ones built by Piper Aircraft Corporation? E.g. is the PA-28-181 "Archer III" (1994 model, s/n 2890206 through 2890231, and 2843001 and up) also affected? And the PA-28-161 "Warrior III"(1994 model, s/n 2816110 through 2816119, and 2842001 and up)? The applicability does not specify serial numbers, nor does it state "all serial numbers".	CAA NL	09/12/05	Noted. The applicability listed in the PAD was based on the UK CAA AD. The applicability for the AD will be based on the Service Bulletin 1131, which varies slightly and includes some PA-32s that were assembled with the cast cylinder.
General	I would strongly advise the use a date format for ADs and PADs that includes the name of the month (as given in JAR 39 advisory material). This will avoid any confusion and it is also standard ATA practice to avoid this format.	CAA UK	14/11/2005	Agreed. Name of the month will be incorporated in the date for this and future ADs.
General	I do not see the necessity for this AD. I have been maintaining PA28's fixed gears for many years now, with thousands of flying hours each, and only once I have found a crack, that was at the lower attach pivot point of the main gear torque link, not at the upper pivot point that your PAD refers to. I found that crack by visual inspection without a magnifying glass. This visual inspection	Air Service Limburg	14/11/2005	Not agreed. The commenter does not specify what crack size was found without a magnifying glass. In this component, a crack easily detectable through unassisted visual means may already be close to or in excess of the critical crack size. The proposed inspections ensure cracks are detected before cracks become critical. Piper SB1131 specifies inspections over and above the

	is part of the Piper inspection program as described by the manufacturer. If a gear leg fails during landing, due to a crack as described in your PAD (the complete failure), the mechanic has neglected that gear for a long time. I also have never heard of such a failure in the Netherlands, and there are still quite a few of these machines flying here. Maintenance personnel have to make sure the torque links are properly shimmed, so wheel shimmy won't occur. In that case there won't be any cracking.			basic Piper inspection programme that are necessary to prevent an unsafe condition developing. The AD is required to ensure all aircraft are inspected accordingly.
Compliance	You refer in the bottom of the AD to the maintenance manual of the PA28-181 for dye-penetrant instructions. However, if I am performing maintenance to a PA28, other than the -181 model, I, as a mechanic, am not allowed to use that manual. I suggest the PAD to refer to AC43.13-1B, chapter 5, section 5, just as Piper SB 1131 does.	Air Service Limburg	14/11/05	Partially agreed. In this case, the use of the PA28-181 model inspection technique is approved by the AD for the purpose stated only and is therefore approved data that can be used by personnel implementing the actions required by the AD. A reference to SB 1131 will be included in addition to the existing reference.
Compliance	As for the compliance time, I would like to suggest that this is changed in "next 100 hrs inspection, or annual inspection, whichever comes first". This gives the owner/operator of the aircraft the chance to have this inspection done during the 100 hrs inspections and not somewhere in between. This could happen if the AD sticks to the 75 hour requirement.	Air Service Limburg	14/11/05	Agreed. The suggested change is more practical and will not significantly increase the overall fleet compliance times.