

EASA PAD No. 06 - 150
COMMENT RESPONSE DOCUMENT
[officially closed for comments 30 June 2006]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
TC Holder	<p>Reims Aviation went bankrupt some years ago and the TC has not been "held" by anyone since. Although I have been informed by both FAA and Cessna that the Cessna Aircraft Company will formally become TC-holder for all the license-built Reims aircraft (with the exception of the Reims F406, the TC being held by Reims Aviation Industries, a new company), I doubt it is correct to mention "Reims Aviation" as the "Type Approval Holder's Name"?</p> <p>My suggestion is to consider EASA AD 2005-0030 as having set a precedent in such cases. After all, there is currently no TC-holder for the type F150/FA150/FRA150/F152/FA152 series.</p>	Paul van Eenige, CAA-NL	July 5, 2006	<p>Agreed [Roger Hardy, Manager GA]</p> <p>Cessna and the FAA are working on the Reims Aviation TC transfer. But neither Cessna nor the FAA can give to the DGAC-F a target date to conclude. Based on the fact that the affected type design does not presently have a TC holder qualifies it as being an "orphan" airplane. However, for practical purposes, the name 'Reims Aviation, S.A.' will be retained in the document to indicate the most recent TC-holder.</p>
Foreign AD ref.	<p>Even though in practical sense DGAC France issued their original AD in response to FAA's 80-11-04, I doubt whether it is appropriate to list this FAA AD as reference. After all, unless EASA/DGAC transfer all AD responsibilities to FAA, parallel to the TC transfer from Reims Aviation to Cessna, the F150/F152 series remains formally a "European Type Design".</p>	Paul van Eenige, CAA-NL	July 5, 2006	<p>Not agreed.</p> <p>In accordance with the technical agreement signed between the FAA, the DGAC-F, Cessna and Reims Aviation, Cessna handled the continued airworthiness activity for the Reims Aviation models. Therefore the FAA AD 80-11-04 was applicable to the Reims Aviation models according the agreement and the DGAC-F AD was issued in accordance with it.</p>

Reason	<p>If I understand the "Reason" to explain why there is a need to replace DGAC AD 1984-067 R1 with this new EASA correctly, the DGAC added a "final date" for accomplishment of the FAA's requirements, which will now be removed with this EASA AD?</p> <p>If so, I suggest making this explicit, e.g. by adding a sentence, "This calendar time limit is now withdrawn".</p>	Paul van Eenige, CAA-NL	July 5, 2006	<p>Agreed.</p> <p>After a technical review, it has been considered that the French condition in addition to the FAA AD requirement should be no longer mandatory.</p>
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