

EASA PAD No. 07 - 022
COMMENT RESPONSE DOCUMENT
[consultation period closed 16/03/2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>Paragraph (4) of the Compliance section will require replacement accumulators installed after 31 October 2009 to be inspected in accordance with APPH Ltd SB AIR91666-29-03. Prior to this date the AD will permit accumulators, held as spares, to be used as replacements when they have not been inspected in accordance with APPH SB AIR91666-29-03.</p> <p>The intention of the Caution detailed at the top of page 6 on BAE Systems ISB.29-047 is to advise operators that they should ensure any spares are inspected prior to use, and that this advice should be heeded with effect from the issue date of the ISB.</p> <p>We are also aware that NDT inspections of some of the affected units defined in APPH Ltd SB -AIR91666-29-03 have previously been carried out using NDT instructions contained in an earlier APPH Ltd SB AIR91666-29-02, which are the same as those in AIR91666-29-03. It should therefore not be necessary to require re-inspection iaw the later APPH bulletin where a satisfactory inspection has been completed iaw the earlier bulletin. Further explanation of this point is provided by the second Note of Paragraph 1D(1) in BAE Systems ISB.29-047.</p> <p>In order to accommodate the above comments, BAE Systems suggest that the wording of paragraph (4) be changed to : "After the effective date of the Airworthiness Directive, no person may install a spare accumulator identified by APPH Ltd Service Bulletin AIR91666-29-03 as a replacement part, unless it has been inspected in accordance with APPH Ltd Service Bulletin AIR91666-29-02 or AIR91666-29-03."</p>	Trevor Wood, BAE Systems	26/02/2007	<p>Principle of comments is agreed. Compliance paragraph (4) will be reworded as follows:</p> <p>After the effective date of this AD, no person may install a spare accumulator identified by APPH Ltd Service Bulletin AIR91666-29-03 as a replacement part, unless it has been inspected in accordance with APPH Ltd Service Bulletin AIR91666-29-02 or Air91666-29-03. (See second Note in paragraph 1D(1) of BAE Systems (Operations) Ltd ISB 29-047 for further explanation)</p>