

EASA PAD No. 07-083
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 11/07/2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>In the 'Compliance' Section, Item 1, of EASA Proposed Airworthiness Directive 07-083, the second paragraph states: "If any resistance exceeding 50 Ohms is found, <u>before next flight</u> replace the Pitot probe in accordance with inspection SB....."</p> <p>Meanwhile, ATR MMEL 30-30-1, 'Probe Heating- Pitot' is a Category B (3 day/ 72 hour) Item and, provided two of the three pitots have heating available and the aircraft operates under the conditions of Column 5 'Remarks or Conditions', allows for dispatch. While these conditions in Column 5 are somewhat restrictive, it still allows <i>some</i> operational leeway as the current AD proposal requires <i>immediate</i> Pitot Probe replacement before dispatch.</p> <p>Is it possible that the MMEL conditions can be applied if, on inspection, one of the three Pitot probes' heating resistance is found to exceed 50 Ohms?</p>	Gerry Butler, Aer Arann, Ireland	27/06/2007	<p>(1) MMEL conditions are based on the assumption the aircraft are in "normal" or standard conditions. Here we have a PAD because a design problem has arisen concerning the pitot probes. Then, the AD compliance time regarding a non conformance of the heating probe system will need to be more restrictive than the allowed MMEL interval due to the safety issue.</p> <p>(2) This is a dormant or latent failure that requires action to be detected and a final terminating action to replace the pitot probe sensor. All these are addressed by an AD.</p> <p>(3) In addition, MMEL conditions are for commercial transport (cargo and/or passenger), whereas at least in theory any ATR could be susceptible to be operated under other kind of operations.</p> <p>No changes are made to the AD as a result of these comments.</p>
General	This appears to be the age old problem that I first raised with ATR over eight years ago where the pitot mast heater fails, but the probe heater continues to work. In this configuration, the pitot failure system	Colin McDougall Air Pacific, Fiji	30/07/2007	No comment.

	<p>fails to bring up a warning.</p> <p>The defect makes itself known when a DADC fails, normally on descent in icing, then self rectifies once the aircraft is clear of the icing.</p> <p>I am pleased that something has finally been done about this problem.</p> <p>When is it proposed to release the AD?</p>			
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