

**EASA PAD No. 07 – 129**  
**COMMENT RESPONSE DOCUMENT**

**[officially closed for comments on 06 September 2007]**

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE	PCM RESPONSE
As indicated	<p><b>§ Applicability :</b>  <u>Comment 1</u>            Considering the identification method used by MESSIER DOWTY for the parts they manufacture, P/N D22710000-9 corresponds to the P/N of a new side brace assembly delivered from the production line with all the evolution from -1 to -9. Upon application of SB 631-32-194 to existing part the re-identification consists in adding the suffix -9 to the existing P/N. As an example P/N D22710000-7-8-9 corresponds to the successive addition of the suffix 8 and suffix 9.</p> <p>According to the wording you used, it can be understood that only the aircraft on which two new side brace assemblies P/N D22710000-9 have been installed are not impacted by this AD, while aircraft on which side brace assemblies modified into -9 configuration are installed would still be impacted, what is not true.</p> <p><u>Proposition 1</u>            We suggest to modify the wording as follow : "...unless MLG side brace assemblies Part Number (P/N) D22710000 incorporating suffix -9 are installed ..."</p> <p><b>§ Compliance :</b>  <b>Point 1 :</b>  <u>Comment 2</u>            The repetitive inspection is to be performed on side brace assemblies not modified into -9 configuration. If this is not specified, then it could be understood that until the aircraft is equipped with two side brace assemblies incorporating suffix -9 (refer to § applicability), the inspection must be performed on both side brace assemblies. In the</p>	Marion CHOUDET  ATR - DO/TC/A  CONTINUED AIRWORTHINESS ENGINEER	28 August 2007	Comments partially accepted and taken into consideration into the revision 1 of the PAD 07-129 resubmitted for consultation before final release.

	<p>case where an aircraft would be equipped with two different side brace assemblies, only one incorporating suffix -9, then the inspection must be performed only on the one not incorporating suffix -9.</p> <p><u>Proposition 2</u> We suggest to modify the wording as follow : " After 11 May 2007 (the effective date of EASA AD 2007-0112), comply with the following requirements only on side brace assemblies not incorporating suffix -9</p> <p><b>Point 2 :</b> <u>Comment 3</u> From a technical point of view, the actions requested in 2.1, 2.2 and 2.3 are correct, with just a little mistake on the re-identification of modified part where it should be read : "... re-identify the MLG side brace assembly P/N by adding suffix -9...".</p> <p>However, it is ATR opinion that there is no real need to provide so much details in the AD. All the steps 2.1, 2.2, 2.3 are already detailed in the SB 631-32-194.</p> <p>In addition, we would like to remind you that this SB will be applied during side brace assembly overhaul or repair which means, only in MESSIER DOWTY agreed repair station. During "normal" overhaul, parts are deeply inspected and as soon as a crack is found, the part is either repaired if feasible, or scrapped. And the only thing that ensures that the part is airworthy before being re-installed on an aircraft is the associated EASA form 1. We therefore think that 2.3 is useless, and 2.1 and 2.2 sufficiently detailed in the SB.</p> <p><u>Proposition 3</u> We suggest to replace 2.1, 2.2 and 2.3 by the following : "Inspect and modify MLG side brace assemblies P/N D22710000 not incorporating suffix -9, in accordance with the accomplishment instructions of MESSIER DOWTY SB 631-32-194."</p> <p><b>Point 3 &amp; 5 :</b> <u>Comment 4</u> Point 3 and 5 requirements have the same objective : make sure that from the 31 December 2015, all aircraft will have 2 side brace assemblies incorporating suffix -9 installed and that they will not be replaced by a previous configuration without suffix -9. We therefore</p>			
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<p>think that we can find a wording that would make this as a single requirement.</p> <p>In addition, the wording used in point 3 is not clear : what should be understood by "... any remaining <b>unmodified P/N D22710000</b>...".</p> <p><u>Proposition 4</u> We suggest to delete point 5 and modify point 3 as follow : "From 31 December 2015, all aircraft must be equipped with two side brace assemblies P/N D22710000 incorporating suffix -9, in accordance with the accomplishment instructions of SB ATR42-32-0092."</p> <p><b>Point 4 :</b> <u>Comment 5</u> After installation of a side brace assembly incorporating suffix -9 on an aircraft, this side brace assembly is no longer subject to the mandatory repetitive inspection. If then this side brace is replaced with one not incorporating suffix -9, compliance point 1 is still applicable and in any case, this could not happen after 31 December 2015 (compliance point 3).</p> <p>It is our opinion that such a replacement of a side brace incorporating suffix -9 with a previous configuration would be very remote as it is not in the interest of any operator to do that. The repetitive inspection is a supplementary maintenance burden and experience has shown that operators prefer to seize the first opportunity to perform a terminating action rather than keep on with a repetitive inspection. Nevertheless, to cope with very urgent operational need it might be useful to keep the possibility of installing side brace at previous configuration, the safety being kept through the repetitive inspections required in §1.</p> <p><u>Proposition 5</u> We suggest to delete point 4.</p> <p><b>Note 4 :</b> <u>Comment 6</u> The wording used is not clear enough : "... installation of <b>modified MLG</b>... §1 of this directive <b>may be</b> discontinued."</p> <p><u>Proposition 6</u> We suggest to modify this Note 4 as follows : "After installation of MLG side brace assemblies incorporating suffix -9 on both LH and RH side</p>				
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	<p>of the aircraft, the repetitive inspections as required by §1 of this directive are no longer required."</p> <p><b>Ref. Publications :</b>  <u>Comment 7</u>  The sentence "or later approved revisions of these documents" is applicable to all the documents listed in this section. According to its location it seems that it is only applicable to the three MESSIER DOWTY SB listed.</p> <p><u>Proposition 7</u>  We suggest to put the following sentence at the very end of this section : "Any later approved revision of these documents is acceptable."</p>			
As indicated	<p>Dear Sirs,  TRIP Airlines in Brazil operates seven ATR42-300/-320 and has two comments about PAD 07-129:</p> <p>- Para. 1.2:  What will be the limit for next inspection for Side Braces inspected more than 1.000 FC ago on new AD effective date? (AD 2007-112 have interval of 2.600 FC after first inspection)</p> <p>- Para. 4:  Most of Airlines are used to control components as MLG Side Braces separately from the aircraft, because they are replaced regularly. There will be cases that a Side Brace modified could be replaced for other unmodified but this one having good credit for next overhaul. This could not be prohibited.</p>	<p>Augusto Martins  Rossetti</p> <p><i>TRIP Airlines –  BRAZIL</i></p> <p><i>Maintenance  Engineering</i></p>	<p>Fri  24/08/2007</p>	<p>Comments partially accepted and taken into consideration into the revision 1 of the PAD 07-129. Refer to paragraph 1.2 of PAD 07-129R1.</p> <p>As about paragraph 4, even after rephrasing (see § 3 and 4 of PAD 07-129R1 ) it has been assessed to maintains the requirement to obtain a gradual diminution in number of the non modified assemblies in time</p>