

EASA PAD No. 07 – 129R1
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 21 September 2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE	PCM RESPONSE
Compliance, paragraph 2	As already proposed in the comments sent for the first issue of this PAD, ATR considers that the text in point 2.1, 2.2 and 2.3 could be lightened taking into account that the inspection and modification are requested to be performed during the overhaul of the MLG side brace assembly, which means in dedicated Part 145 organisation. At least, the terms " <i>before re-installation of the MLG on an aircraft</i> " could be deleted as, in any case, a Part 145 organisation cannot send a defective part for installation on aircraft (this is covered by the EASA form one associated to the part).	Marion CHOUDET ATR - DO/TC/A CONTINUED AIRWORTHINES S ENGINEER	10 September 2007	Comment partially accepted. A rephrased version has been opted, Yet, still identifying one by one the requirements to be done i.e: inspect; then modify and re-identify the MLG side brace assemblies.
Compliance, paragraph 3	In this sentence, the word " <i>modified</i> " seems to indicate that only existing side brace assemblies that have been modified, to add suffix - 9, can be installed, whereas new parts with suffix -9 are, of course, also acceptable. We suggest to delete the word " <i>modified</i> ".	Marion CHOUDET ATR - DO/TC/A CONTINUED AIRWORTHINES S ENGINEER	10 September 2007	Accepted.

Compliance, paragraph 4	First of all, we would like to stress the necessity to use simplified English vocabulary in Airworthiness Directives, in order to enable operators, that are not native English speaking, to easily understand the compliance requirements. Consequently we suggest to replace "as of" by "from" or "since" or "after", at the beginning of this paragraph. Then, because of the same reason detailed in Comment 2 about the use of the word "modified", and also because we don't see the point of referring to ATR Service Bulletin in this paragraph, we suggest the following text : " From 31 December 2015, no person shall install any MLG side brace assembly P/N D22710000 without suffix -9 on any ATR 42-200, 42-300 and 42-320 series aircraft."	Marion CHOUDET ATR - DO/TC/A CONTINUED AIRWORTHINES S ENGINEER	10 September 2007	Accepted.
Compliance, NOTE 4	For the same reason detailed in Comment 2, we suggest to delete the words " <i>unmodified</i> " (in the first sub-paragraph) and " <i>modified</i> " (in the second sub-paragraph).	Marion CHOUDET ATR - DO/TC/A CONTINUED AIRWORTHINES S ENGINEER	10 September 2007	Agreed but the comment is now obsolete due to the rephrasing. (See PCM response for Compliance, paragraph 2)