

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-055-CN

**[Published on 16 April 2021 and officially closed for comments on 07 May 2021]**

### **Commenter 1: Lufthansa Technik AG – Tobias Doetsch – 27/04/2021**

#### **Comment # 1**

- A. The base document for AD 2021-07-13 is SB25-1111432 issued in 2007. The original manufacturer Pacific Scientific does not exist anymore and the referenced restraint assy list in Appendix 01 is no longer up-to-date. E.g. the TAAI8-Series cockpit seat installed in A350 aircraft are equipped with harness P/N 2000114-73-001 which is also containing an affected buckle as per AD 2021-07-13 (i.e.: P/N 1111475-03). But harness P/N 2000114-73-001 is not listed in Appendix 01.
- B. The scope of SB25-1111432 was a certain batch of buckles manufactured between November 2004 and May 2007. Only those buckles had the rotary handle with the thicker vanes, having the potential risk of cracking. Why is the AD applicable to all buckles being P/N 1111475 and 1111430, without reducing it to the batch specified in the SB?
- C. [FAA] AD 2021-07-13 does not define any terminating action. According to chapter (e)(3), an inspection of the handle vane thickness has to be performed as soon as a new buckle (or lap belt assy) will be installed to the aircraft, or processed in goods receiving. There is no acceptable solution according to the AD to mark a buckle as "inspected". We would expect, that at least new or overhauled parts will be excluded from that inspection task.
- D. In 2008, AIRBUS released OIT 999.0051/08 stating, that "No more aircraft are delivered from production on or after 10 December 2007 with potential affected cockpit seat buckles." What is the value of this statement, if the AD mandates to inspect all cockpit seat buckles?
- E. The list of aircraft manufacturers having the affected buckles installed is very misleading. The AD explicitly emphasizes OEMs like Mitsubishi, Cessna, Viking etc. and does not even mention the two major OEMs of civil aircraft. This could lead to the conclusion, that AIRBUS and BOEING aircraft do have these buckles installed.
- F. Please state, why the EASA agreed to make SB25-1111432 mandatory for rotorcraft only in 2007, but now 14 years later the same SB is made mandatory to all aircraft. What made EASA to recall the safety analysis and reset the risk level?

#### **EASA response:**



*The comments are noted and, although not directly pertinent to PAD 21-055-CN, nor to the decision to cancel EASA AD 2007-0256, the following can be provided:*

- A. The FAA represents the State of Design for the affected buckles, which could (according to the FAA assessment) be installed on ANY P/N restraint system. This is why the FAA AD does not limit the AD to only those P/Ns specified in the 2007 SB. According to FAA records, Pacific Scientific Company is still the TSO approval holder, despite the fact that the company is now owned by Meggitt.*
- B. The FAA have determined that there is no reliable method to identify the date of manufacture of a buckle, hence the determination by the FAA that all buckles having one of these P/N are 'suspect' and their decision to make the AD applicable to ALL those buckles. If such a method becomes available, the FAA will consider approving such method by AMOC.*
- C. A buckle can be marked (or recorded) as 'inspected' by each operator, which will likely be an acceptable method to allow (re)installation of such buckle/restraint assembly on any aircraft – subject to acceptance by the competent authority (usually State of Registry of the aircraft). There is no need to specify this in detail in the AD, as this would take away operator/authority flexibility. For new parts, the current manufacturer (Meggitt) should be contacted to find how this will be managed. See also EASA answer to point B. of this comment above.*
- D. The commenter should contact Airbus for the answer to this question. In-service, an operator can install parts other than those installed by an aircraft manufacturer on the production line. Any statement like the one quoted is therefore of limited value anyway.*
- E. The list of aircraft manufacturers is limited, but the Applicability of the AD addresses the buckles directly. The statement of “.....may be installed on **but not limited to**.....” is standard for all 'equipment-level' ADs, indicating that the AD should be taken into account (i.e. recorded, status and possible action(s) to be determined) for ALL aircraft.*
- F. As the original EASA AD 2007-0256 implies, the risk assessment was provided by helicopter manufacturers and, at the time, there was no indication or information that the use of these buckles on fixed-wing aircraft constituted a similar risk that would warrant AD action. See also the CRD attached to the record of AD 2007-0256 (now -CN) where the comments on PAD 07-134 are recorded.*

*Please note that EASA relies (Bilateral agreement) on the latest risk assessment from the FAA, which is why [AD 2021-07-13](#) has been adopted by EASA 'as is'. No additional or new risk assessment was done by EASA. The FAA AD was publicly consulted as NPRM FAA-2013-0752, initially on [05 September 2013](#), and then re-issued (supplemental notice) on [24 September 2020](#), therefore owners and operators of affected aircraft, including those registered in EASA Member States, have had ample opportunity to comment on the proposed FAA action.*

*Any additional questions should be directed to the FAA. No changes have been made to the Final AD-CN in response to this comment.*



**Commenter 2: Air France – Steve Gachot – 06/05/2021****Comment # 2**

- A. This PAD requires the application of AD FAA 2021-07-13 with an effective date at May 11, 2021.
- B. Air France sets up the actions necessary for the application of this AD (inspection of seats on aircraft, securing shop repair and parts stored, replacement of defective buckles). However, we have currently in stock around the world (not installed on aircraft) more than 150 seats to be inspected and therefore we will be in difficulty to apply the Point 3 of AD 2021- 07-13 on this set of seats before the date of May 11, 2021. See AD FAA 2021-07-13, § 3 Required Actions:

**(3) As of the effective date of this AD, do not install a buckle or a restraint system with a buckle, P/N 1111430 or 1111475, all dash numbers, with a handle vane thickness of 0.125 inch or greater on any airplane or helicopter.**

We think this point will put many operators under high strain. We request that EASA AD could increase this time period : We suggest two months more.

**EASA response:**

- A. Comment not agreed. PAD 21-055-CN was issued to announce EASA intent to cancel EASA AD 2007-0256; by definition, a Proposed AD does not require any action. The fact that EASA decided to ‘adopt’ FAA AD 2021-07-13 makes that FAA AD (see Commission Regulation [\(EU\) 748/2012](#), Part 21.A.3B, paragraph a) equal to an EASA-issued AD and must therefore be complied with.**
- B. Comment not agreed. EASA cannot change the compliance time of an FAA AD. Where necessary for urgent operational needs, the commenter can apply to the competent authority for approval of a temporary exemption (Basic Regulation (EU) 2018/1139, Article 71) for the inspection requirements. See our [AD FAQ](#).**

**It should also be noted that the AD does not require all buckles installed on spare seats to be inspected at the latest on the effective date. The AD prohibits installation on an aircraft of an affected buckle (or restraint system/seat with affected buckle) from 11 May 2021 (the effective date), which means only buckles that ‘passed’ the inspections can be installed, or other buckles (or restraint system/seat with not-affected buckle). As long as the 150 spare seats that the commenter refers to are NOT installed on any aircraft, they do not need to be inspected. This can be deferred until the moment of (just before) installation.**

**Any additional questions should be directed to the FAA. No changes have been made to the Final AD-CN in response to this comment.**

