

EASA PAD No. 07 - 134
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 7 September 2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Applicability:	the list of the affected rotary buckles PNs and relevant restraint system PNs is the same as per Pacific Scientific SB; but the manufacturing date affected time frame (Nov2004-Mar2007) is not reported on PAD 07-134 >>>May you confirm if the applicability of the PAD is to all the affected PNs as listed or to all the affected PNs having manufacturing date Nov 2004 - Mar2007?	Marilena Colasante Engineering Department AirOne	06/08/2007	Comment agreed. The time frame for the affected production is now stated in the sections "Applicability" and "Reason" of the PAD and is consistent with Pacific Scientific SB.
Applicability:	In case of all the listed PNs are affected without any manufacturing date time frame restriction, which is the identification mean of the new replacement parts in order to identify the new ones and the old ones?	Marilena Colasante Engineering Department AirOne	06/08/2007	See above.
Compliance	step 1.2 "...inspect not cracked buckles before any flight..." >>>Clarify if a buckle inspection is requested at the daily check.	Marilena Colasante Engineering Department AirOne	06/08/2007	Even if a daily check requirement is almost equivalent to "before any flight", since the AD will be limited to rotorcraft only, the requirement for the buckle inspection will remain before any flight to ensure safety in the most efficient way.
Applicability	We request that the "Applicability" section of the AD be changed to reflect; FROM "1111430-XX and 1111475-XX used on, but not limited to, seat restraint systems:"... TO: "1111430-XX and 1111475-XX used on seat restraint systems:"... [and] FROM:	Neil V. Richardson Product Support & Services Pacific Scientific Company	16/08/2007	Comment agreed (see also the answer here below). Therefore the sentence "1111430-XX and 1111475-XX used on, but not limited to, seat restraint systems:" will be replaced by: "1111430-XX and 1111475-XX used on seat restraint systems:" on the final AD. Anyway, since it is not possible to

	<p>"known to be installed on, but not limited to, Eurocopter a/c models"...</p> <p>TO:</p> <p>"known to be installed on Eurocopter a/c models"...</p>			<p>be sure that a seat belt, originally installed into a Eurocopter aircraft, was moved to another helicopter, we shall maintain the sentence "known to be installed on, but not limited to, Eurocopter a/c models".</p>
Applicability	<p>Pacific Scientific has recently held discussions with our customer Sogerma, who supplies seats for Airbus aircraft installations. Airbus in turn has reviewed the Pacific Scientific SB, and have observed that the nature of the failure mode described poses minimal risk in their aircraft installation. They have requested that the word "mandatory" be removed from the Pacific Scientific SB for applicable Airbus installations.</p>	<p>Neil V. Richardson</p> <p>Product Support & Services</p> <p>Pacific Scientific Company</p>	16/08/2007	<p>Pacific Scientific comment is agreed (see also the answer here below).</p>
General	<p>PACIFIC Scientific is an US manufacturer, what is the FAA position with regards to this issue?</p>	<p>Eric Blancaneaux</p> <p>SA Continued Airworthiness Manager</p> <p>Airbus</p>	06/09/2007	<p>The FAA was contacted on July 17, 2007 for co-ordination on this issue, and finally they agreed on a corrective action to be taken and had no objection for EASA to issue a European AD.</p>
Applicability	<p>AIRBUS airplanes have these buckles for crew seats: according to our analysis we have not determined a realistic scenario that would create an hazardous condition: i.e. the aircraft has to be upside down on ground with the buckle being cracked at that time; therefore the pilot will not be able to completely release the restraints.</p> <p>This failure is not hidden and is detectable at each flight and according our procedure a failed buckle can not remain on the aircraft prior next flight. As such, the probability of this failure is extremely improbable and the AD should exclude large aircraft.</p>	<p>Eric Blancaneaux</p> <p>SA Continued Airworthiness Manager</p> <p>Airbus</p>	06/09/2007	<p>Comment agreed.</p> <p>There is a very remote likelihood for an airplane, as a consequence of an emergency, to lie in a position making the seat occupant bearing on a restraint system buckle which was badly inspected for integrity before flight. The final AD will be revised to be applicable to rotorcraft only.</p>
Compliance	<p>If EASA position is maintained, have you confirmation from PACIFIC of their industrial capability to provide spare part within 6 months.</p>	<p>Eric Blancaneaux</p> <p>SA Continued Airworthiness Manager</p> <p>Airbus</p>	06/09/2007	<p>The AD applicability was limited to rotorcraft only (see above), but anyhow EASA received confirmation by the manufacturer about their capability to provide spare parts within the required timeframe.</p>