

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>The compliance statement in the PAD below causes us some concern from an Operational, Engineering, Planning and spares procurement perspective.</p> <p>Compliance:  Within the next 2 months after the effective date of this AD, Perform a detailed visual inspection of the seat lateral and central spreaders as instructed in paragraph (§) A.1of Sicma Aero Seat Service Bulletin (SB) No.94-25-013.</p> <p>The PAD 07-188 statement conflicts with SB and is VERY restrictive given the time frame to accomplish the inspection and repairs. We would like to see a much closer alignment of the AD and SB.  We have not yet been provided any assurance of spares availability to us and with out this we could conceivably end up with a large number of seats blocked out to a point were it is not economical to continue operating the aircraft which has potentially devastating effects for our operation.</p> <p>The AD directs you to replace all three spreaders at the same time, if all 34 seats fitted to our ATR72 aircraft are found with any cracking then potential we will have to replace 102 spreaders to put each aircraft back into service.  We have already replaced a large number of these spreaders as part of SB94-25-011, the AD would see us replacing these again. Initial cost of repair kits from SICMA have indicated that to comply with AD will cost approximately 25,000 euros per aircraft alone.  With a fleet of 11 aircraft this AD could run in excess of 250,000 euros just for the SB repair kits.</p> <p>SICMA have also indicated a 2 month lead time from point of placing the spares order, to be able to comply with the AD we will have to</p>	<p>Glasse, Shane</p> <p>ATR72 Fleet Engineer</p> <p>Air New Zealand Tech Ops/ATR Support</p>	<p>Tue 13/11/2007</p>	<p>The initial draft version of the Sicma Aero Seat Service Bulletin (SB) No.94-25-013 didn't discuss the crack propagation velocity, i.e. didn't address the possibility for the crack to start and to propagate to the web between two subsequent inspections. The new released version, based on cycling testing, states an acceptable interval for inspections to avoid cracks reach the web. The AD now accepts this result and refers to the "decision three" of the a.m. SB.</p> <p>The Agency concurs with this comment. Replacement of the spreaders can be done on necessity. If this option is followed, then inspections must be performed until all the old design spreaders are on the seat.</p> <p>Sicma stated in a dedicated meeting with EASA that "All in all</p>

	<p>order 11 complete ship sets at least two months before inspection whether we need them or not to ensure we are able to meet the compliance times.</p> <p>This cost does not include the replacement of the additional spreader required in the AD nor additional sundry parts and labour, this is a huge burden of cost on the airline operation and also presents us with problems scheduling in inspections and repairs into an already extremely tight maintenance schedule.</p> <p>Given our past experiences with delivery of parts from SICMA we have severe concerns that parts will not be available to support this scale of change of spreaders.</p> <p>We respectfully request the AD compliance be amended to take these points into consideration.</p> <p>Inspect all seats IAW Sicma Aero Seat Service Bulletin (SB) No.94-25-013 within 6 months or at next C Check which ever occurs first after the effective date of the AD.</p> <ul style="list-style-type: none"> <li>o A 6 month period would allow us to schedule the inspection and allow for spares procurement.</li> <li>o A 6 Month period would also allow a number of aircraft to have the inspection carried out a C Check which is a more appropriate time to carry out this size inspection and repair.</li> </ul> <p>If ANY spreaders is found cracked in Zone D, before next flight carry out replacement of that spreader IAW Sicma Aero Seat Service Bulletin (SB) No.94-25-013.</p> <ul style="list-style-type: none"> <li>o Repeat inspections will capture and spreaders that fall outside the zone D replacements, IAW the SB these are able to continue to crack to the thin wall before they require replacement.</li> <li>o Spreaders with cracks outside zone D can be scheduled for replacement at the next C check.</li> <li>o Our in service experience has shown that these cracks propagate very slowly,</li> </ul> <p>Presently we have these on a 500hr repeat inspection and have seen no further cracking of the spreaders.</p> <p>Repeat inspection at intervals not to exceed 3 months or 750 flight hours.</p> <ul style="list-style-type: none"> <li>o In service experience has shown us that once the seat has cracked initially we have experienced no further enlargement of the cracks.</li> <li>o We currently have two aircraft with spreader cracking outside zone D that have more than 1000 flight hours with no further cracking evident.</li> </ul> <p>At next C Check carry out Sicma Aero Seat Service Bulletin (SB) No.94-25-012</p>			<p>the manufacturing and delivery time of a 100 reinforced spreader batch should be around 1 week / 10 days"</p> <p>The AD is now re-formulated: immediate replacement is requested only for spreaders with cracks longer than 8 mm. Spreaders not cracked or with crack(s) less than 8 mm can be operated subject to periodical inspections or, optionally, replaced at the most opportune time for the operator.</p> <p>Moreover, the AD now embodies the possibility to repair the central spreaders, thus extending their life.</p> <p>The length of crack on which new spreaders are required (7-8 mm) have been determined by SICMA on the basis of the propagation crack figures via cycling tests and in order to be sure no any existing and detected crack will propagate until the web of the affected spreader before reaching the next repetitive inspection (about 700/750 flight hours).</p>
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