

EASA PAD No. 07-188R1
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 04 April 2008]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Applicability	<p>PAD is effective to all Part numbers for 94XX seats, however the SICMA SB only covers Standard seat part numbers. Our fleet has a number of seats with In Arm Trays (IAT) (PN. 9402001-03 and -04) that are also subject to spreader cracking but are not covered by either the inspection requirements of SB 94-25-013 or the repair solution SB's 94-25-01 1 and -012.</p> <p>These IAT seats are fitted in the first row of each aircraft and are subject to the same inspection criteria as the rest of the seats fitted IAW with the PAD. With no superior replacement parts available we will have to fit the original part number spreaders which will still be subject to repeat inspection at 550fh and most likely continue to crack. We suggest that the AD be delayed until SICMA provides inspection requirements and repair solutions for ALL seat part numbers fitted to the aircraft.</p>	<p>Shane Glassey ATR72 Fleet Engineer Air NZ Tech Ops/ATR Support Ivan Crescent #3 Hangar, CHC Airport New Zealand ++64 3 374 7885 ++64 21 727 346 www.airnz.co.nz</p>	02 April 2008	<p>The seat manufacturer is not yet ready with a solution to fix the Front Row seats cracking problem. Delaying the current AD will give no advantage in terms of safety and work rationalisation and therefore it will be issued as written. A new AD will follow to deal with the F/R seat spreaders.</p>
Compliance	<p>PAD establishes in item(1) that "within two months after the effective date" of the AD affected seats should be inspected.</p> <p>Our experience has shown that most of the seats will require replacement or repair of the spreaders at time of inspection (before further flight). We would find the time frame of two months unachievable given current white space available in our maintenance program.</p> <p>Time to inspect one aircraft is in the vicinity of 5 to 6 man hours and if any repairs or replacements are found then this could require a further 150 man hours per aircraft if all the spreaders are to be replaced.</p>			<p>This comment is accepted.</p>

	<p>With our fleet of 11 aircraft this runs to over 1600 man hours which for us is not achievable within a two month period. Our past experience has shown that has high as 90% of the spreaders will have cracking beyond 8mm.</p> <p>We suggest that the compliance time frame be extended to 6 months to allow operators with larger fleets time to comply with the AD without adversely compromising maintenance programs and manpower planning.</p>			
Compliance	<p>PAD Item (3) states "within the threshold defined", we believe this statement should be "which exceed the criteria defined" as this makes a clearer statement of fact.</p>			<p>The decision tree already gives explicit criteria for continuing the inspection, repairing or replacing the spreaders; the proposed wording could drive to a misunderstanding since there is not one criterion only to be considered. Anyway, in order to avoid misinterpretation, the wording "within the threshold defined by § A-1 Decision Tree of Sicma SB 94-25-013" was changed into "within the threshold defined by the criteria specified in § A-1 Decision Tree of Sicma SB 94-25-013".</p>
Compliance	<p>PAD item (1,2, and 3) refer to the decision tree in SB 94-25-01 3, we believe the statement should be refer to the decision tree in "SB 94-25-01 3 issue 4 or later" as earlier revisions of this SB do not contain the decision tree and can be quite misleading.</p>			<p>This comment is accepted.</p>