

EASA PAD No. 07-202
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 10 December 2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>On review of PAD 07-202 concerning the proposed mandatory embodiment of SB 53-175, I have a query which I would be grateful if you can review/comment accordingly. It appears that the SB when issued gave a 12 month 'grace' period for any inspections which may have fallen due with the reduced intervals. The note from the SB reads as follows:</p> <p>'Any worse case modified inspection can be delayed for up to 12 months from receipt of the SB but must not exceed the originally scheduled inspection point'.</p> <p>Therefore if a task fell overdue as a result of the implication of the reduced intervals, so long as the original inspection point was not exceeded, the initial inspection at the reduced interval could be delayed for 12 months.</p> <p>Our concern is that if the SB is mandated as it currently stands with no new 'grace period' granted with the proposed AD, various operators could find themselves grounding some aircraft with overdue inspections as 12 months from the SB issue date will be the 20/12/2007.</p> <p>Flybe as an operator has been proactive and has attempted to pre-empt the effects of the SB becoming mandatory. However this may not be the case for other operators.</p> <p>As such, a fresh 'additional' grace period should be granted with the new AD to supersede that mentioned in the original SB and which must be given in <u>cycles not calendar as mentioned in the SB as the inspections affected are cyclic not calendar driven</u>. A practical suggestion would be 2000 cycles from the effective date of the SB, providing the original inspection points are not exceeded.</p>	Nick Ford, Flybe	13/11/2007	<p>Comment partially agreed. AD will include an amendment to allow time period to begin from the effective date of the AD.</p> <p>However, it is considered that this should be retained as a calendar period (i.e. the 12 months as currently stated in the ISB) rather than in flight cycles, as proposed by Flybe.</p> <p>The Note already contains the caveat "..... but must not exceed the originally scheduled inspection point.", which will effectively require the majority of operators to undertake the activity at the next ½ C check i.e. typically within 12 months. The purpose of the stated calendar period is to require that low utilisation operators carry out the activity within a defined time frame, rather than allowing aircraft to remain uninspected for a protracted period.</p>

Compliance	<p>BAE Systems has reviewed the recently published PAD 07-202, and wish to forward the following comment.</p> <p>BAE Systems (Operations) Ltd ISB.53-175 Revision 1 introduces some minor technical changes and additional explanatory text, but does not materially affect the content of the inspection tasks detailed in its paragraph 2C. BAE Systems is aware that some aircraft have been previously inspected in accordance with the initial issue of the ISB. In order to avoid any unnecessary re-inspection of these aircraft it is suggested that the "Compliance" paragraph of the AD should include a statement that recognises "Inspections and rectification work carried out in accordance with BAE Systems (Operations) Ltd ISB.53-175 Initial Issue also satisfies the requirements of this Airworthiness Directive."</p>	Trevor Wood, BAE SYSTEMS Regional Aircraft	14/11/2007	Comment agreed. AD will include proposed change with minor editorial amendments.
Reason	<p>In the last sentence of "Reason" section: The words 'Airworthiness Directives' should be in the singular.</p>	As above	21/11/2007	Comment agreed. AD will include proposed change.
Compliance	<p>In the "Compliance" section, paragraph 3, last line: Insert the letters 'MRB' before the words 'airframe life limit'. Without this additional information it might be possible for aircraft operators to misconstrue the service bulletin instructions and delay carrying out the action until 60,000 flight cycles when aircraft are transitioning to the SSID as part of the Life Extension Program.</p>	As above	21/11/2007	Comment agreed. AD will include proposed change with MRBR being used instead of MRB for consistency.