



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 08-128
CLOSED FOR COMMENTS ON: 18 December 2008

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>Definitely PGA is always looking to eliminate potential risks or eventual safety issues in the Aircraft Structures & Systems and not rely only on "Caution statements" either from the AMM or AOM.</p> <p>Based on the above we don't see other option except to comply with the SBF100-30-018, even knowing the operational/crew workload benefit is minimum</p> <p>Our single request is to allow the operators the planning time and opportunity to embody the modification, i.e. to combine the SB with a D CHK (12 000 FH or 6 YR, MRB Tasks).</p> <p>In resume, will be possible to define the compliance terms for six (6) years or D CHK (12 000 FH or 6 YR, MRB Tasks, whichever comes first?</p>	Luiz Fernandes, PGA – Portugália Airlines	20/11/2008	As indicated in the Proposed AD, the events that led to mandating SBF100-30-018 were primarily caused by operational (human) factors. However, it is highly probable that these two aircraft losses would not have occurred if the OGWLEHS had been installed. In determining the compliance time for this AD, initially the calculations described in GM 21A.3B were made. These indicated a compliance time of 350 flight cycles. This was considered not realistic in view of the related down time of the aircraft, and the logistics involved in providing the needed components. Taking also into account the operational aspects of the unsafe condition, the compliance time of 24 months was decided upon. The comment provided by PGA has been considered but it does not provide additional arguments to change this decision.
Required Action(s) and Compliance Time(s)	<p>Tyrolean would like to raise objection respectively two issues regarding PAD 08-128 On Ground Wing Leading Edge Heating System (OGWLEHS) – Installation</p> <p>First we do not see the additional safety benefit. Our opinion based on De- and Anti-Icing requirements, as required by regulation, is that the OGWLEHS system may introduce a false sense of security to ground handling crew and flight crew. In winter time the rule is to have a clean and correct De- and Anti-Iced Aircraft. No additional system</p>	Eduard Schuster, Tyrolean Airways	03/12/2008	In the decision to mandate installation of the OGWLEHS, it was seriously considered whether there could be a negative human factors effect, in the sense of what the comment calls a "false sense of security". The final conclusion was that the expected safety benefit is far larger than this potential negative human factors effect.

	<p>will take away the basic clean wing requirement.</p> <p>Request:</p> <p>In our view the OGWLEHS introduces a hidden human factor and as such we request to reconsider this PAD. If this PAD turns out to be the only way forward, then please review the implementation time. The ground time for this modification will be around 8 days and the best is to do this together with heavy maintenance checks.</p> <p>The heavy maintenance checks are all done on our affected Aircraft the last two years. This modification does not harmonize with the content of a C-check (eg. Wing Leading Edge not removed) so we need extra downtimes and manpower for this implementation within the 24 month acc PAD. This gives a big financial and manpower impact.</p> <p>Request:</p> <p>Based on the existing clean wing concept plus fully established De- and Anti-Icing procedures and the Maintenance benefit (together with heavy maintenance), we request a 36 calendar month (1/2 of 6 yrs check) implementation time.</p>			<p>With respect to the compliance time, please see the response on the comment above.</p> <p>The comment provided by Tyrolean Airways has been considered but it does not provide additional arguments to change the compliance time. The TC holder has indicated (ref. All Operators Message AOF100.154#02) that the downtime can be substantially reduced by the use of more manpower.</p>
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