



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-093
 CLOSED FOR COMMENTS ON: 14 August 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>I am writing to you in response to PAD 09-093 and wish to have my objections for the proposed modification considered.</p> <p>I have been involved with the Dornier Do328-100 series continually since 1995; I have also [been] and still am a MRB/ISC member.</p> <p>I also remember the first incident in February 1999 when MSN 3054 operated by Minerva Airlines overran the runway at Genoa which involved 4 fatalities.</p> <p>The Italian accident investigation report determined that the crew were unable to retard the Power Levers into Ground Idle because the Power Lever latches had been lifted before the Flight Idle gate. The recommendation from the Italian authorities was. <i>"Fairchild Dornier should define an emergency procedure allowing the crew to manage incidents where it is repeatedly impossible to move the power levers from the flight idle position during the period of travel after landing"</i>.</p> <p>In June 2006 MSN 3093 operated by City Star overran the runway at Aberdeen in similar circumstances to the Minerva aircraft. I was involved in assisting the AAIB with their investigation into how the Power Lever system functioned.</p> <p>The AAIB recommended the following: <i>"It is recommended that Aircraft Aerospace GmbH advise all operators of Dornier 328 turboprop aircraft to detail procedures, and provide adequate training, to ensure that their pilots are able to act appropriately if the beta control range on the power levers cannot be selected after landing"</i>.</p> <p>On [19] March 2008, MSN 3107 operated by Cirrus Airlines overran the runway at Mannheim. The BFU accident [report] has yet to be published.</p>	Ian Viscogliosi, Cirrus Technik GmbH	25/07/2009	<p>The comment has been reviewed and considered; however, there is no alternative design change that can, with a sufficient level of confidence, reduce the risk that such events occur again.</p> <p>Crew awareness training has been used in the past and limitations have been introduced in the form of written (flight- and operations manuals) information, but these alone have not proven to be effective. A placard is insufficient to establish immediate crew awareness.</p> <p>The modification as proposed will clearly indicate mishandling of the levers to both pilots by means of a unique aural alert.</p> <p>The proposal for an additional placard in a conspicuous location will be given consideration by the TC-holder.</p> <p>No changes have been made to the Final AD in response to this comment.</p>

	<p>In all the above cases the crew anticipated by pulling the Power Levers into Ground Idle by lifting the PL Latches before the PL had reached the Flight Idle Gate. This caused the PL to stop (not jam as reported) from being retarded any further back. The system worked as designed to prevent crews from retarding the PL in one motion from the Alpha range into the Beta range.</p> <p>The Aircraft Operating Manual 20-01-00 Page 7 casually states “do not lift the latches before FL as this prevents selection of power settings at or below FI”. In my opinion this should be stated as at least a Caution.</p> <p>Again, in my opinion, had the crews identified the reason for the PL being prevented from being retarded further because of the latches, none of the accidents would have happened. This is a training issue and not a system deficiency.</p> <p>My proposed solution is that:</p> <p>A. The results of lifting the latches early should be demonstrated at the simulator training sessions. Issuing Service Information Letters, Customer Information Letters and FOI's is and has proved inadequate as they may not be distributed to new crews [and/or] operators, and</p> <p>B. PL should be placarded “<i>WARNING do not lift the latches before FI gate as this will prevent further movement of PL</i>”.</p> <p>On the Dornier Do328 there have been 2 Main Passenger Door inadvertent openings during take off and the fix for this was AD EASA 2007-0199 & SB328-11-454 which installed a placard “DO NOT TOUCH HANDLE DURING FLIGHT”.</p> <p>In which case placarding of the PL's should have the same effect.</p> <p>The modification SB328-76-486 proposed by the TCH unnecessarily complicates the PL system and could lead to other problems in the future. It is also extremely expensive at €25,000.00 per aircraft.</p> <p>Finally I would also question whether or not the crews are familiar with the correct way of adjusting the cockpit seats, as this can have an ergonomic effect on the position of hand and PL The AOM just says “adjust seat”. I look forward to your comments.</p>			
Required Action(s) and Compliance Time(s)	<p>I am writing to express my concern at the pending implementation of PAD No.: 09-093.</p> <p>ScotAirways have been operating the Dornier 328 Turboprop since 1995 and have, during this period, operated up to 8 aircraft at any</p>	Mike Hathaway, Scot Airways	22/07/2009 & 05/08/2009	<p>See reply above.</p> <p>No changes have been made to the Final AD in response to this comment.</p>

	<p>one time accumulating approximately 164,875 Flying Hours and 151,889 Flight Cycles. I have asked for comments within ScotAirways and the following details, derived from discussion within the Pilot community, serves to indicate why ScotAirways do not want SB 328-76-486 (dated 15 July 2009) mandated. The comments were given great consideration and have been supported by the Chief Pilot, Head Training Captain and the Flight Safety Officer.</p> <p>The power levers on the Dornier 328-100 can be 'locked up' by raising the latches before the power levers have been fully retarded to FI. This then prevents the selection of GI until the latches are released. This is a known problem with the aircraft that is relatively easily overcome by training and subsequent awareness.</p> <p>ScotAirways first became aware of the problem after receiving our first aircraft in 1995. There were several occasions when the levers became briefly locked up but with the crews aware of the problem, it was always quickly resolved.</p> <p>Since the SB-328-76-268 was completed, the incidence of power lever locking up has fallen dramatically. It now only occurs rarely - normally by F/O's during their early days on line. The problem is nearly always resolved by a call of 'I have control' by the Commander. The F/O releases the power levers and the Commander can then retard them to the stop and through the gate.</p> <p>All aircraft suffer from design features that could be improved. These, however, always come at a cost and it is important to achieve a balanced resolution. ScotAirways strongly believe that modification of the throttle quadrant at this stage of the aircraft life is excessive and unnecessarily expensive. Had this problem been identified during the initial trials on the aircraft then the proposed solution [might] have been viewed more positively.</p> <p>ScotAirways have operated the 328-100 for 14 years now. There have been occasions when the power levers have been locked-up but the situation has never been allowed to develop into a serious incident. This is due to training and subsequent awareness of the crews. ScotAirways will continue to reinforce this message during initial and recurrent training to prevent an incident. This is a potential problem of which everyone is aware and ScotAirways believe the proposed modification to be an unnecessary and expensive solution to what is potentially a training issue.</p>			
Required Action(s) and Compliance	I would like to submit an objection to this proposed AD regarding Dornier 328 Power Lever Control Boxes. I have been involved	Emmett Gavin	14/08/2009	See reply above.

Time(s)	<p>solely with Dornier 328 Turboprops since 1998 as a B1/B2/C Engineer and I believe this modification is unnecessary, expensive and will make an already complex system even more so.</p> <p>The core issue here is a lack of training & awareness by crews despite numerous publications in the form of AOT and Service Information Letters. This is not an effective method of disseminating information to Pilots as they are incorporated within the engineering manuals. There is a high turnover of crew in this type of operation and the message is soon lost. Suckling Airways have accumulated well over 100,000 hrs of 328 turboprop operation in 14 years and I am not aware of any instances of this problem occurring at this Airline. Every pilot I have ever asked has been aware of the correct operation of the system and has had it demonstrated in their training. In 2006 I provided assistance with the AAIB investigation into the MSN 3093 runway overrun at ABZ and it is clear that mandatory awareness training would have prevented this accident.</p> <p>My suggestions would be an Airworthiness Directive to include the following:</p> <ul style="list-style-type: none"> - Mandatory awareness training of crews as to the correct operation of the power lever system and the corrective action to be taken in the event of an error being made. There should be an auditable record of this training for each pilot. - The Power Lever latches should be painted with yellow & black stripes on the upper surface similar to the parking brake lever, gust lock and other controls that require high levels of configuration awareness. - The Power Lever Control Box should be clearly placarded in red "Do Not Lift Power Lever Latches Above Flight Idle". 	Suckling Airways (Cambridge) Ltd		No changes have been made to the Final AD in response to this comment.
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