



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-094
 CLOSED FOR COMMENTS ON: 19 August 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Reason; Required Action(s) and Compliance Time(s)	<p>I have received the above captioned Proposal to Issue an Airworthiness Directive and have reviewed the contents thereof. I have discussed the wording with our maintenance engineer and we find the instructions and information confusing and misleading.</p> <p>Paragraph 3 under the side heading "Reason" suggests:-</p> <p style="padding-left: 40px;">"The TC holder has now developed a modification, consisting of the cold expansion of the former lower wing panel CAMLOC holes together with the installation of new attachment material that will prevent the onset of cracks in the affected wing panel, <u>thereby eliminating the need for repetitive inspections</u>"</p> <p>However the next paragraph makes it clear that:</p> <p style="padding-left: 40px;">"Modification does <u>not</u> constitute terminating action for the new repetitive inspection requirements of this AD"</p> <p>The new repetitive inspection requirements are referred to in clause 3 and these are set at 800 flight cycle intervals where the operator is obliged to undertake an NDI.</p> <p>However clause 4 makes it clear that there is a requirement for a further NDI inspection to be performed within 24 months and for the relevant modification to be undertaken (if "no cracks are found").</p> <p>Clause 7 then goes on to indicate that despite the modification being undertaken it does not remove the requirement for a further 800 flight cycle repetitive inspection under clause 3. If this is correct then what is the point of the modification?</p> <p>Surely if the modification is designed "to prevent the onset of cracks in the affected wing panel" then surely the modification is intended to eliminate the problem. As indicated "<u>thereby eliminating the</u></p>	Tobi Matthews	13/08/2009	<p>Comment accepted.</p> <p>The confusing sentence has been removed from the Final AD accordingly.</p>

	<u>need for repetitive inspections</u> Please explain with greater clarity what it is that the operator of an aircraft is meant to do. Airworthiness Directives re crucial documents and any form of ambiguity is undesirable and potentially dangerous.			