


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 10-010 [Published on 13th January 2010 and officially closed for comments on 10th February 2010]</p>

EASA response to all comments:

Please refer to PAD 10-010 Withdrawal Statement which can be found at: <http://ad.easa.europa.eu/>

1. Comments received by regular mail:

Commenter 1 : Friese Aero Club, P. D. van Vliet – Dated 20/01/2010 – Registered under our reference A/1228

Comment # 1

Subject: EASA (P)AD 10-010 to maintenance of aviation safety belts.

On Jan., 13h, 2010 the EASA announced a (P)AD see subject.

The background of this (P)AD is the EC Regulation 145.45, which says, maintenance just has to be carried out by using OEM-maintenance-manuals. Concerning safety belts these data are not available generally. Therefore maintenance was done in accordance with procedures approved by the LBA (the German Aviation Authority).

The publishing of this (P)AD surprised completely, as just in November 2009 the Gadringer company were visited by EASA+LBA and they made no remarks about any security concerns. There were no limitations or what so ever outspoken to the work of maintenance of aviation seat belts. In general they do not understand this proposed procedure by the EASA as their approval in accordance to EASA-Part-145 is still valid until today without any changes and all maintenance was always made in accordance to their approval.

We believe this (P)AD is:

imbalance: as only belts of some selected OEM / producers are effected

unfair: as within Europe only those 4 German producers are effected

disproportional; as more than 40 years Gadringer produce and do maintenance on safety belts without any complaints as such as of the material nor safety.

In particular the back dated invalidation of all their work done under a valid approval is totally unacceptable.

We think the EASA is not aware of the consequences the publishing of this AD will cause to the aviation in Europe. We ask you with emphasis to repeal this AD.

Commenter 2 : SKYPARTS GmbH, Peter Zweifel, CEO.– Dated 28/01/2010 – Registered under our reference A/1217

Comment # 2

Als Unterhaltsbetrieb von Kleinflugzeugen sind wir wie alle Unternehmen in dieser Branche auf seriöse Geschäftspartner angewiesen. Seit langem lassen wir Anschnallgurte durch die Firma Gadringer Gurte GmbH, D-Calden reparieren und ändern. Alle unsere Aufträge werden stets zu unserer vollsten Zufriedenheit, kompetent und zuverlässig ausgeführt. Wir hatten nie Anlass zu Beanstandungen. Es erstaunt uns deshalb sehr, dass wir nun diese Firma auf dem EASA AD 10-010 vom 13. Januar 2010 finden. Die von Ihnen geforderten Vorkehrungen, entsprechende Sitzgurte auszubauen und zu ersetzen, sind für uns völlig unverständlich. Uns sind keine Schadensfälle bekannt, die auf minderwertige Materialien oder mangelhafte Arbeiten der Gadringer Gurte GmbH zurückzuführen waren. Wir bedauern sehr, wenn der Fortbestand einer soliden, alt eingesessenen Firma durch Massnahmen, wie Sie sie in Erwägung ziehen, gefährdet wird. Auf Grund unserer positiven Erfahrungen mit der Gadringer Gurte GmbH möchten wir gegen eine tatsächliche Herausgabe einer AD Widerspruch einlegen. Wir bitten Sie, die vorgeschlagene AD nochmals zu prüfen und zu überdenken. Es würde uns sehr freuen, auch weiterhin auf die gute Zusammenarbeit mit dieser Firma zählen zu können. Gespannt warten wir auf Ihre Stellungnahme.

Commenter 3 : Luftsportverein Vilshofen e.V., Geschäftsführer: Wolfgang Riegel – Dated 01.02.2010 – Registered under our reference A/1093

Comment # 3

We are a flying club representing about 300 members.

We operate about 10 aircrafts.

The seat belts were overhauled/repared by the German shops without any problems. We also never heard about any problems here in Germany.

Our service station has informed us, that we need new belts, if PAD becomes effective. It's a lot of money we would have to spend, we have to say for nothing, no improvement. If the PAD becomes effective, we need more time to get new belts for example 12 months. We also would prove the possibility to go to court.

We are not alone with this thinking, after contacting many flying club, associations.

Commenter 4 : Piloten-Service Robert Rieger GmbH, W. Rieger - Dated 01/02/2010 – Registered under our reference A/1068

Comment # 4

We are now for 38 years in GA Business (maintenance and service) and have never seen a AD/LTA without any safety related problems.

Here in Germany nearly the complete GA Fleet is affected (Conform to a german NFL, we have to overhaul, change all belts after 12 Years). In this PAD there are only german shops listed, whats about the other european shops? If you see the experience of 40 Years on som shops with no safety problems, we can not understand the reasons. It's not possible to replace all belts in 3 month, also if you order new parts in USA. The aircrafts will be grounded with all the financial effects. Please cancel this PAD and develop a solution not to ground the complete fleet. Hoping to hear better news.

Commenter 5 : Wolfgang D. Schuele – Dated 02/02/2010 – Registered under our reference A/1094

Comment # 5

I learned about the proposed AD 10-010 which will require replacement of certain aircraft safety belts / restraint systems within a period of three months.

- As I understand, this requirement is based solely on a regulation problem. It is not backed by any reasonable doubt about the technical airworthiness of the affected safety belts / restraint systems. There have neither been problems with, either any of the affected maintenance organizations, nor with any of the affected safety belts / restraint systems.
- As I understand, Germany is the only country which has a 12 years' time limitation on safety belts / restraint systems *even* if there was no manufacturer requirement to have the systems overhauled after a specified number of years. In other countries these were on-condition. So, under that regulation, the general condition of safety belts / restraint systems was, without any doubt, better than those not overhauled every 12 years.
- As I understand, maintenance organizations in other European countries have provided the same kind of overhaul / maintenance service using the same proven practice and technology. Safety belts / restraint systems overhauled or maintained by these companies are not affected by the proposed AD.
- As I understand, the German LBA was the competent government agency at the time of overhaul / maintenance of safety belts / restraint systems.
- As I understand overhaul and maintenance has been done in accordance to state of the art technologies. Seat belts / restraint systems are not high tech components that would require extraordinary scientific background or technology.

Considering all these facts, the proposed AD 10-010 appears overly bureaucratic, confirming the common sentiments in the aviation community against EASA.

The proposed AD is, also, discriminating treatment of German maintenance organizations and (mainly) German aircraft operators.

For the individual aircraft operator it is undue burden, since it is not based on technically verified airworthiness deficiencies. A replacement may require additional modifications on the aircraft, aggravating the burden.

The time limit is way too short to have the complete fleet of affected aircraft modified. This means that a large number of aircraft will be grounded should that AD go into effect. It is highly inappropriate to use a strong means of regulation for a regulatory problem which is not based on a real safety problem.

Furthermore, it is in dissent to the policy of legal certainty, since it suspends legal practice (valid at the time of overhaul) without providing a reasonable transition period. This could easily be accomplished by conceding an appropriate time limit to concur with the end of the 12 year life time period of each safety belt / restraint system. This could be supported by having the safety belts' / restraint systems' airworthiness verified by the aircraft maintenance organization during the next annual inspection in the same way on condition inspections are done. This brings me to the point, wondering why EASA is blowing up a small problem into a major issue. If this is how aviation administration works in Europe, we all have a big problem.

2. Comments received by E-mail

Commenter 1 : Air Tahiti NUI – Philippe Carloz – 13/01/2010

Comment # 1

Regarding the « Required Action and Compliance Time » of the PAD, is it possible to validate this AD by the means of the record? We, at Air Tahiti Nui, can prove that we never received any safety belts repaired by the organisations mentioned in the PAD as we have always purchased new built safety belts directly to the OEM Amsafe. This solution will prevent to have to inspect all the safety belts installed on aircraft and will save time.

Commenter 2:– Heli Holland Technics BV – Michel Beijk - 14/01/2010

Comment # 2

If this PAD will be an AD, it will be proved that EASA is only for the approval holders to protect their market position.
It should state in the reason box that the (E) TSO approval holders should be forced not to holding back the approved maintenance data causing an maybe unsafe situation.
EASA is only helping the approval holders in this.
EASA approved the procedure and organizations which were performing the repairs, replacing the webbing of seat belts can be seen as standard practice and so be accepted.

Commenter 3: Gadringer-Gurte GmbH – Harald Müller– 14/01/2010

Comment # 3

“What about belts and restraint-systems of other manufacturers, f.e. GADRINGER-GURTE / AIRCRAFT BELTS INC. / RUPPERT / TAKATA / INDIANA MILLS / CESSNA / PIPER etc., which have been repaired or overhauled by the named organisations? Why are parts of these OEM not related from the investigation? Parts of these OEM with just a national (f.e. LBA-)approval and no (E)TSO-approval are even related from this PAD?

Commenter 4:– -Wolfgang Braun - 14/01/2010

Comment # 4

"I can understand your Problems!

- but I'd say:

Let the Belts "legal alive" till next Maintenance!

and for the future: let the Manufacturer decide if & who can do Service or not!

W. Braun; D-KIIX; Ventus CT with fine Autoflug belts serviced very fine by Gadringer last year!

Commenter 5 : AIS Technics– Len Trouw – 15/01/2010**Comment # 5**

"In the required actions and compliance section it gives the names of non approved maintenance facilities that have maintained or overhauled safety belts, were they at one time approved facilities or not? If they were an approved facility then can we have a date of overhaul or maint from which we can work from. It seems odd that these companies did not have some sort of approval at some stage.

Why is LTB Schlemann still taking on seat belt O/H work if they are on your hit list, or haven't they been informed about the AD?

Commenter 6:– - Hans-Udo Hellrigel - 14/01/2010**Comment # 6**

Insbesondere die Firmen Gadringer, Schlemann und andere haben über viele Jahre Anschnallgurte anderer Hersteller, auch aus dem Ausland, mit Erfolg instandgesetzt. Probleme sind bislang nicht bekannt geworden. Die genannten Firmen haben nach deren Angaben die von den Herstellern im Internet bereitgestellten Unterlagen als Grundlage der Reparatur angewendet.

Wenn seitens EASA vom (US)-Hersteller genehmigte Unterlagen gefordert werden und diese nicht oder nur gegen erhebliches Entgelt bereitgestellt werden, so führt das zu einer Wettbewerbsverzerrung zum Nachteil der Europäischen Wirtschaft. Die für die zukünftige Instandhaltung aufzuwendenden Beträge fließen dann nach USA ab. Die bisherige Erfahrung der Europ. Firmen ist zweifelsfrei ausreichend für eine sichere Ausführung. Ich schlage vor, an diesen und ähnlichen Stellen im Interesse der von EASA angestrebten Entbürokratisierung die bei den Firmen vorliegenden Unterlagen nach entsprechender Überprüfung zur Verwendung zu genehmigen oder etl. auch 145.A.045 dahingehend zu ändern, daß vom Hersteller genehmigte Unterlagen nicht zwingend gefordert werden. Das Qualitätssicherungssystem der Betriebe müßte sicherstellen, daß jederzeit die durchgeführten Instandsetzungen den Anforderungen eines sicheren Betriebes genügen.

Commenter 8:– - Alan Tocock- 15/01/2010

Comment # 8

The following comments are respectfully submitted for consideration; I am a member of a UK third-party maintenance organisation QA Department and a licenced engineer; the following are personal comments and not company.

Regarding the PAD, could the following please be clarified?

- A. The paragraph titled 'Manufacturer(s)' lists 6 ETSO approval holders, however the AD, especially the 'Applicability' paragraph does not refer to these holders or this paragraph by reference in any way. It is assumed that this AD applies ONLY to seat belts of ALL part numbers manufactured by these particular ETSO holders and fitted to ANY aircraft? If so it would be clearer if the applicability paragraph stated this.
- B. The required actions specify that "No later than 3 months after the effective date of this AD, inspect the markings of safety belts and torso restraint systems, to determine....". Could EASA consider adding instructions as to what action to take if NO markings are present on the belts or restraint systems? This may have significant short-term (logistical) impact if not considered and clarified?

Commenter 9 : Prince Helicopters – Ton Prince– 15/01/2010
Comment # 9

"We object to your proposed PAD 10-010 regarding Safety belts and Torso Restraint Systems.

The fact that it affects 4 organisations seems to us that it has more to do with a competitor reason than a quality one.

LTB Schleman did repair work for us on Safety Belts and Restraint Systems after we checked that they were certified by EASA to do so.

Commenter 10:– Cranfield University - Jim Gautrey- 15/01/2010
Comment # 10

Should this be an AD as there is not a problem with the type design? I recall previously that the non-MCAI route was used for this type of situation, i.e. where work carried out by a company was not correct in some form or other.

Commenter 11 : Inaer Helicopter Italia – Alessandro Ernoli – 15/01/2010
Comment # 11

Could you add an example of how should be a marking of a repaired/maintained safety belt or torso restraint system?

That will be a great help in order to obtain the correct data from the field.

Commenter 13 : LTB Schlemann GmbH - Dieter Schlemann – 15/01/2010

Comment # 13

We would like to get an information if the PAD Nr.: 10-010 only concerns EASA-admitted seat-belts (ETSO) or also FAA-admitted seat-belts (TSO).

Commenter 14: Aeroplex of Central Europe Ltd – - Gyorgy Ujlaki - 15/01/2010

Comment # 14

We received the subject PAD and our Component control center (CCC) made a quick check, how much seat belts were repaired at facilities listed in subject PAD “required action (s)” section.

Acc. to this review it looks like from 2005 Aeroplex Ltd. sent more than 500 seat belts for repair to “ACM Aircraft Cabin Maintenance GmbH”.

We have no more detailed information about circumstances of the situation described in mentioned PAD. Please inform us,

1. Is there any timeframe after that the above mentioned repair facility - ACM Aircraft Cabin Maintenance GmbH - can repair the seat belts in accepted way complying with all airworthy requirements,
2. Or not recommended to send any more seat belts for repair to the repair facilities listed in subject PAD “required action (s)” section ?

Commenter 15 : Wolfgang (Robert) Rieger – 16/01/2010

Comment # 15

We never had any problems with safety belts repaired or overhauled from the mentioned companies. We are now in GA business the last 37 years and working with them the last 20 years.

Have you any safety related problems?
 Can you imagine that here in Germany nearly the complete GA fleet is affected?
 In Germany all belts has to be overhauled each 12 years, so they checked the couplings and replaced the belt material on nearly all aircrafts.
 If this AD comes , there is more time required to replace the belts, for example 12 month.
 Have you alternate methods of compliance?
 This ad would give only business to USA, there is no improvement in safety.
 We hope this ad will be cancelled , the aircraft owners had to invest a lot of money the last years (mode s xpdr, elt 406, fire extinguisher, camo requirements etc).

Commenter 16: Frank Kummetat- 16/01/2010

Comment # 16

Wenn sie diesen Entwurf wirklich umsetzen wollen, frage ich mich was in Ihrem Hause bewerkstelligt wurde.
 Erst sind Betriebe angehalten worden sich zu zertifizieren, und im nachhinein wird deren bis dahin
 EASA konforme Arbeit als nichtig erklärt?
 Warum werden dann Betrieb EASA zertifiziert?
 Wer hat denn die Aufsicht?

Wenn eine vorher nicht vorhersehbare Gefährdung von diesen Instandsetzungsarbeiten ausgehen würde,
 könnte ich diesen Vorschlag vielleicht noch verstehen.

Aber in ihrem Entwurf ist diese mit keiner Silbe erwähnt.

Die Aufsichtspflicht über ihre Zertifizierten Luftfahrtbetriebe liegt bei der EASA.
 Sollten sie ernsthaft rückwirkend (und das für 12 Jahre im Falle der Gurte) ihr Genehmigung

Commenter 17 : Avanti Air GmbH & Co KG - Marcus Deblitz– 17/01/2010

Comment # 17

1.) Basically it is incomprehensible, why shops like ACM (and others as listed in the AD) first got their EASA approval for overhaul and/or repair of seatbelts, and such approval (for our understanding) had been based on the same Items which have been now identified by the EASA as insufficient.

- 2.) Taking the proposed time between replacement into account, we are pretty sure that we will run into AOGs, due to the fact that as well bigger airlines have to order thousands of new seatbelts at the manufacturer, which will finally cause lead times far away from any acceptable timeframe.
- 3.) We highly recommend, to make inputs at the manufacturers, that they should make the current CMMs accessible and distribute them to EASA approved repair stations, just to prevent any monopolization.
- 4.) If there's is no other solution than to revoke the approval of the listed shops acc to the AD, we recommend to extend the TBR (time between replacement) due to the fact, that there's until today no known case, where any of the overhauled or repaired seat belts of one of the listed overhaul shops failed, and we expect lead times for new units from the manufacturer, which are unacceptable.

Commenter 18: *Luftsportverein Neuwied e.V.- Christian Mies- 16/01/2010*

Comment # 18

I am wondering why suddenly an old established company - who has maintained the safety belts of our aircraft for many, many years - should be no longer allowed to serve their customers.

We have allways been satisfied by Gadringers service for over 20 years and I am very sure that Gadringer has allways perfomed maintenance following every existing rules and data.

Why is it tollerated that third parties use EASA for collecting money and cover their business mistakes in such a way the claiming companies seem to do?

Why is does EASA support third parties to send their competitors into trouble? This is not what I call free market economy!

Is this PAD really based onto hard facts like faulty safety belts or even any incidents with safety belts mantained by Gadringer or one of the other companies listed? I doubt that because otherwise that would have been mentioned in the PAD.

So this PAD seems to me like a little child crying: "He stole my sand molds ..."

If there are REAL facts, please publish them together with a PAD or do not publish the whole PAD.

Commenter 19 : *Gerhard Pachowsky– 17/01/2010*

Comment # 19

1. Die AD entspricht in ihrem Inhalt nicht dem in ED Decision No. 2/2003 genannten Ziel: Zitat: The Agency shall issue an airworthiness directive when an unsafe condition has been determined by the Agency to exist in an aircraft, as an result of a deficiency in the Aircraft or an engine, propeller, part or appliance installend on the aircraft and that condition is likely to exist or develop in other aircraft.

Die durch die Agentur gemachte Feststellung, dass die genannten Firmen ohne mit dem Type Design Holder abgestimmte und durch die Agentur genehmigte Unterlagen Reparaturen bzw. Überholungen durchführten, heißt doch nicht automatisch, dass die von den genannten Firmen bearbeiteten Sicherheitsgurte „unsafe“ sind, d.h. nicht den technischen Anforderungen einer ETSO bzw. TSO entsprechen. Hierzu bedarf es doch Beweise, die von der Agentur vor AD-Herausgabe einzufordern wären.

Von einer „unsafe condition“ kann nur gesprochen werden, wenn tatsächlich diese vorhanden ist. Eine Vermutung allein als Basis der AD gemäß PAD zu verwenden würde letztlich bedeuten, dass wohl zukünftig generell bei Feststellungen von Regelverstößen ohne auf den technischen Aspekt einzugehen, Luftfahrzeuge stillgelegt werden müssten.

2. Die von der Agentur in der PAD 10-010 erhobene Forderung, die Sicherheitsgurte zu prüfen, würde bedeuten, dass geschätzt bei mindestens 50% der zur Zeit in Deutschland zugelassenen 17000 Flugzeuge bis 2t, Motorsegler und Segelflugzeugen die Sicherheitsgurte innerhalb 3 Monaten ein Austausch der Sicherheitsgurte notwendig wird. Da die Lager- bzw. Fertigungskapazitäten der anerkannten Hersteller für Sicherheitsgurte bereits jetzt nicht vorhanden bzw. ausgeschöpft sind (Beweis liegt vor), würde die Aktion eine über viele Monate bis Jahre andauernden Stilllegung von etwa 8000 Luftfahrzeugen in Deutschland nach sich ziehen. Umsatzeinbusen in der Größenordnung von mehreren Millionen € wären die Folge. Dies alles würde unter dem Hindergrund einer reinen Annahme ohne jeglichen Beweis des Vorhandenseins einer „unsafe condition“ geschehen.

3. Mindestens zwei der in der PAD 10-010 genannten Firmen (LTB Schlemann, Gadringer Gurte GmbH) besitzen eine Anerkennung als Teil-145 Instandhaltungsbetrieb. Die in diesen Betrieben angewandten Verfahren sind in den vom Luftfahrt-Bundesamt genehmigten Handbüchern festgelegt. Somit ist der, in der PAD 10-010 genannte Vorwurf der Agentur: Zitat: „have been maintained or repaired by maintenance organisations without holding approved maintenance data“ unrichtig. Die Basis für eine auf der PAD 10-010 beruhenden AD ist damit nicht gegeben.

4. Die Agentur begründet die PAD 10-010 zudem mit dem Hinweis, dass Luftfahrzeugteile nur aufgrund von Instandhaltungsdaten des (E)TSO-Genehmigungsinhabers instandgehalten werden dürfen. Hierzu ist anzumerken, dass eine große Anzahl Sicherheitsgurte im Einsatz sind, für die ein wie auch immer gearteter Genehmigungsinhaber schon seit geraumer Zeit nicht mehr vorhanden ist d.h. den Geschäftsbetrieb eingestellt hat. Somit liegt hier ein ähnlicher Fall vor, wie dies auch bei älteren Luftfahrzeugen ohne vorhandenen TC-Holder der Fall ist. Auch diese Luftfahrzeuge werden nach Unterlagen instandgehalten, die keinen gültigen Bezug zum Genehmigungsinhaber haben. Würde man der in der PAD 10-010 durch die Agentur geforderten Vorgehensweise folgen, wären die vorgenannten Luftfahrzeuge ebenfalls stillzulegen.

5. Die Vorgehensweise bei Sicherheitsgurten ist in Deutschland durch das Luftfahrt-Bundesamt in den Nachrichten für Luftfahrer NfLII-83/99 geregelt. Darin ist vorgeschrieben, dass Anschnallgurte, deren zulässige Betriebszeit überschritten ist, müssen ersetzt beziehungsweise durch einen dafür genehmigten Betrieb überholt werden. Mindestens 2 der in der PAD 10-010 genannten Firmen (LTB Schlemann, Gadringer Gurte GmbH) besitzen eine einschlägige Genehmigung. Der deutsche Eigentümer eines Sicherheitsgurts hat somit gesetzeskonform gehandelt, wenn er seinen Sicherheitsgurt zum Ablauf der Betriebszeit des Sicherheitsgurts an einer dieser Firmen zur Instandsetzung gab. Der Eigentümer genießt somit Vertrauensschutz nach deutschem Recht. Dieser Vertrauensschutz kann im nach hinein nicht durch eine Verordnung einer europäischen Behörde ausgehebelt werden, soweit diese Verordnung lediglich darauf beruht, eine durch das Luftfahrt-Bundesamt erlassene Vorschrift ohne flugsicherheitsbezogene Argumentation für ungültig zu erklären.

6. Zur Vermeidung unbilliger Härten möge die Agentur vor der Herausgabe einer AD auf der Basis der PAD 10-010 prüfen, ob die, bei den betroffenen Instandhaltungsbetrieben vorhandenen technischen Nachweise ausreichend sind, die von diesen Betrieben erfolgen Reparaturen an den Sicherheitsgurten aus technischer Sicht zu akzeptieren. Sollten diese Nachweise nicht ausreichend sein, wäre immer noch eine Prüfung der Gurte nach einem noch zu entwickelnden Verfahren ins Auge zu fassen, bevor man die Sicherheitsgurte vernichtet und x-tausende Luftfahrzeuge stilllegt.

Commenter 20: - Piper Maintenance GmbH, Geschäftsführer: Peter Borkowski, Peter Heckhausen 18/01/2010

Comment # 20

Herewith we would like to comment to the recently released (P)AD 10-010 regarding Safety Belts / Torso Restraint Systems as follows.

In our opinion this AD is unreasonably restrictive and discriminates the affected organizations listed in this AD by the following reasons:

We as Piper Maintenance GmbH have long lasting business relationships with Gadringer Gurte GmbH and we did not have any quality or safety issues in the last 20 years. Discussing this issue with other maintenance organizations showed us that they are exactly of the same opinion.

In addition to that it is somehow difficult to understandable why this AD addresses only four German Companies since there are quite a few other companies throughout Europe providing the exact same service.

Furthermore this AD creates a peck of trouble concerning the costs for the replacement with “approved part” and involved down times and other difficulties without obvious reasons. To our knowledge there was not one critical incident in conjunction with the products or services provided by Gadringer Gurte GmbH or anyone of the other companies affected by this AD.

In this context we kindly ask you to review this important issue within your directorate, to find a less restrictive solution, acceptable for all involved parties.

Commenter 21 : –Flugsportgruppe Elz - Andy Bruhl, , 18/01/2010**Comment # 21**

just learned about the above mentioned AD. We never had or heard about any problems with repaired or overhauled safety belts from Gadringer or Schlemann.

Commenter 22: Aer Arann - Rory Hensey, - 18/01/2010**Comment # 22**

Proposed Airworthiness Directive 10-010 specifies the inspection of all safety belts to determine if they have been maintained or repaired by certain organisations. Often, it is not possible to determine by inspection of a safety belt if it has been repaired or maintained by a particular organisation as they may not leave a particular mark or identification on the belt. Indeed, often it is not possible to determine whether a belt has been repaired or not.

Therefore, demonstration of compliance with this PAD, if issued unchanged as an AD, will be difficult if not impossible, without changing nearly all safety belts on all aircraft.

I strongly urge EASA to use a different method to ensure the safety belts which are the subject of this PAD are removed from service.

Commenter 23 : British Gliding Association - Pete Stratten,– 18/01/2010**Comment # 23**

I am enquiring about the applicability of PAD 10-010-1. Is it correct that this PAD does not apply to harnesses originally manufactured and released by Gadringer?

Commenter 24: Imtech Aqua Building Services Ltd - Trevor Nash, - 18/01/2010**Comment # 24**

This is yet another example of EASA putting paperwork ahead of common sense, Gadringer are a part 145 approved organisation, yet this AD will prevent them from carrying out for which they have received approval and been inspected against.

You couldn't make this up, it beggar's belief. Who is going to pay for all the replacement harnesses, EASA, not a chance, will safety be improved, NO (assuming their work meets the standard required by their approval).

Commenter 25 : Silverstar Aviation - Doug Haines, - 18/01/2010**Comment # 25**

1. The proposed AD should more appropriately be issued as a Suspect Unapproved Part Notification.

If these companies have been supplying parts not compliant with approved airworthiness data it should be possible to determine, from the company records, what organisations they have supplied them to and between what dates, thus allowing operators/maintenance organisations to determine if they may be affected.

2. The information provided in the AD is too vague to determine the means by which these parts can be identified, e.g. no mention is made if the parts in question are identifiable by label, ink stamp, or tag? A list of Part Numbers affected would also assist operators.

Commenter 26: Flybe Ltd. - Pete Startup, - 18/01/2010**Comment # 26**

In response to the proposed (P)AD 10-010 and the letter issued by Gadringer-Gurte GmbH, dated 14th January 2010 - [http://gadringer.de/KD-Info\(2\)_GB.pdf](http://gadringer.de/KD-Info(2)_GB.pdf) I have recently had the Gadringer-Gurte seat harness fitted to my Schempp-Hirth Discus re-furbished. This included replacement of all the webbing parts, most of the metal parts, and subsequent testing for full functionality. The harness has been relined for 12 years and issued with a Form 1. I am wholly satisfied with the service carried out by G-G and the quality of their product.

As G-G say in their letter, in good faith and using procedures that are already in place with the full approval of the LBA, I fail to see any grounds for the issue of this AD in its current form.

AD's issued with a backdated validation in this manner are normally due to inappropriate or unapproved procedures having been used that have subsequently been proven to have caused issues of an airworthiness or flight safety nature.

YOU HAVE NO PROVEN OR DOCUMENTED AIRWORTHINESS OR SAFETY ISSUE TO SUPPORT THIS AD.

Instead of issuing an AD with backdated validation which is totally inappropriate and disproportionate, would it not be more appropriate to look at changing the procedures as necessary so that going forward Companies can comply with any NEW EASA certification requirements, i.e. that previously accepted LBA procedures are integrated into new EC regulations like EC Regulation 145.45 etc.

Enforcing this AD will have far reaching consequences for the aviation community, not least of which light sport aviation and gliding form a significant part, and will be badly affected by this AD. I would appreciate an acknowledgement of the receipt of this e-mail.

Commenter 27 : McLean Aviation - Karen McLean – 18/01/2010**Comment # 27**

As Sailplane repairers in the UK, we have regularly had harnesses re-furbished by Gadringer Gurte, including non Gadringer types. We have received an excellent and cost effective service and never had any problems over 25 years. This will have a very damaging effect on our customers for what seems to be not much of a reason.

Commenter 28: Jeroen Pol - 18/01/2010**Comment # 28**

Gadringer and Schlemann are missing. Otherwise all gliders will be grounded. PLEASE do your homework a bit better. You are keeping me too busy with all the half prepared plans you lot are making. LESS is more. More is bullshit. If you want that gliding will be forbidden soon you are going the right way.

Commenter 29 : Tim Freegarde – 18/01/2010**Comment # 29**

This proposed AD seems unduly draconian. Certainly safety belts are important items, but they're also very simple and straightforward, highly reliable in practice whatever their history, and the maintenance organizations listed are respected and professional. It therefore seems most likely that any maintenance that has been done will have been quite satisfactory, whether the paperwork was in order or not. Unless there is evidence or rationale for specific potential snags, I suggest that you therefore replace the mandatory replacement of belts in the case of unauthorized maintenance/repair, with a mandatory inspection to confirm satisfactory release and restraint operations. Should there be reason to believe that a competent organization might have reassembled a particular belt incorrectly, or that a particular belt was in some way particularly susceptible to this (and perhaps with the caveat that this error should not be obvious to the pilot), then mandatory replacement should apply only to the belt models or maintenance organizations concerned. An all-encompassing mandatory replacement would cause many flying/gliding clubs and pilot owners to incur significant expense for no purpose. Given that the problem appears to be principally one of paperwork, a more proportionate action would seem appropriate.

Commenter 30: LTB-Sammet GmbH, Scheibe Aircraft GmbH - Hartmut Sammet, - 19/01/2010**Comment # 30**

über die Veröffentlichung dieser PAD werden wohl nicht nur wir sehr überrascht sein!! Nach Rücksprache mit der Fa. Gadringer wurden die Hersteller bzw. Instandhaltungsbetriebe im Vorfeld wohl nicht über diese PAD informiert!! Der richtige Weg wäre wohl gewesen, die Betriebe vorher darüber zu informieren, dass die

vom LBA genehmigten Verfahren zur Instandhaltung von Anschnallgurten ab einem gewissen Zeitpunkt keine Gültigkeit mehr hat. So haben viele Kunden - im guten Glauben, dass die Instandhaltungsbetriebe die Gurte überholen/instandhalten dürfen - ihre Anschnallgurten in die entsprechenden Betriebe geschickt. Gemäß dieser PAD sind die in den letzten 3 Monaten überholten Gurten demnach nicht mehr lufttüchtig - die Kosten für die Instandsetzung der in dieser Zeit instandgesetzten Gurte übernimmt dann wohl die EASA???

Eine Überarbeitung dieser PAD ist dringend zu Empfehlen!!!

Commenter 31 : LSG Rechlin-Lärz e.V. - Peter Pollack, – 19/01/2010

Comment # 31

I don't know, in which brain this idea was born. Since more than 20 years (because before we were flying in the former GDR/DDR) we are using safety belts, which are maintained e.g. in LTB Schlemann GmbH. This was no problem for the safety. All these companies maintain the safety belts without any safety problems since a lot of years (40,50 years). It would be impossible to change all the safety belts in our club LSG Rechlin-Lärz e.V., because there is no club member, who can understand to change the safety belts without increasing the flight safety. It would be only expensive and impossible for all the manufacturers to deliver new safety belts to all companies, flying clubs, peoples, which are using maintained/repared safety belts. LTB Schlemann, Gadringer ... are approved companies for maintain/repair safety belts. It's incomprehensible, that maintaining/repairing the safety belts was safe up to now, and it will be unsafe for the future. Our belts are new maintained and it's not possible for us, to order new belts.

Commenter 32: - Erich Ceru, NIKI Luftfahrt GmbH, 19/01/2010

Comment # 32

After review of the proposed AD, ref PAD No.: 10-010 following concerns are made by the Operator NIKI LUFTFAHRT GmbH.

We are affected of this proposed AD with our fleet because R&S Aircraft Service is our maintenance provider for repair.

NIKI Luftfahrt Proposal:

Compliance Time after Inspection: 3 month after the inspection performed the removal or replacement, as called out by the AD can not be reached due to the fact that the turnaround time of one aircraft ship set is 4 weeks, already confirmed by the the Safety Belt manufacturer. In addition to purchase additional spare safety belts, to start with the rotation program, the lead time is 4 to 5 weeks. NIKI Luftfahrt suggesting a compliance time scheduled from 7 month after the inspection made.

Commenter 33 : HAMBURG international Luftverkehrsgesellschaft - Volker Tank – 19/01/2010

Comment # 33

We as an airline operator are working primarily with one of the mentioned organisations for restraint overhauls. This cooperation exists for several years. One reason for this selection was a valid LBA and EASA approval. To my knowledge this Approval Certificate is currently still valid.

It is not comprehensible for us, why the work of an for several years LBA and EASA approved organisation which passed LBA and EASA audits without findings is suddenly no longer trustworthy.

Independently of the fact, that with the activity of this PAD the EASA will remove for these four organisations the basis of work and probably they have to close down, our major question is how to proceed in the future with our company policy in selection of overhaul organisations when LBA and EASA Approvals are no longer a trustable reason.

Secondly the question is who will cover the AD related costs.

The given time frame of a maximum of 6 month will be too short. The regular delivery time for a restraint system from Pacific Scientific for instance is 14 weeks. I can imagine that this lead time will dramatically increase when hundreds of owner and operators will order new manufactured restraints from the vendors.

**Commenter(s) 34: Jürgen Schwendtfeger - Gero Winkler - Matthias Langrock - Reiner Crone - Stefan Braun - 19/01/2010 :
Hermann Gold - Dr. Herbert Leykauf - André Weidlich - Jörg Präfke - Sven Richter – Flieger Max - Rolf Wunsch - Dirk Nolzen - Alfred Spindelberger Fahrzeugtechnik GmbH, Alfred Spindelberger, Oliver Habenicht - Hannes Duske - Christian Gruber - Markus Weißenbach - Gerhard Sindermann - Mark Huybreckx - Edgar Leip – Wum - Frank Rimann – 21/10/2010 - Horst von Schaewen - Dr. Arno Hutter - Alexander Koppler - FSC Neumünster, Uwe Götsche - Jürgen Rusch - Danfoss GmbH, Thomas Schart - Sven Killinger - Tim Dickel - Andreas Machai - Segelfliegerklub Magdeburg, Jan Braune – 22/10/2010 Ralf Michael Gerigk - 25/10/10 - Dr. Ewald Nipper – 05/02/2010 – Vrije Universiteit Brussel, Michaela Schoeters 07/02/2010**

Comment # 34

The present AD is only the consequence of an obsolete approval of the four listed companies.

The German LBA has admitted these overhauls in the past.

For me as owner of several aircraft it is completely incomprehensible in what manner the security should be threatened.

In my view, this is merely the result of a complaint of certain producers of the seat belts.

The economic situation of many companies is not good.

This is merely an attempt to disparage the competitors and bring money into their own pockets.

The consequences for the German aviation are enormous.

A large part of the belt systems, especially for gliders, have been overhauled by the mentioned companies.

And not just since yesterday, but for many years.

Apart from that fact, that no improvement of safety is necessary,

nor that would be achieved in an exchange,

that manufacturers don't have the capacity to overhaul the system once again in a short time.

Let alone providing new ones.

For the operator of the aircraft that is not acceptable.

This AD should not be valid.

Commenter 35 : DC Aviation GmbH - Willi Backmund - 19/01/2010

Comment # 35

It isn't to be seen for economic reasons that the belts must be renewed retroactively, because it is a big economic damage for DCA.

In addition, the belts were made only by companies which had an EASA or LBA approval and it is not to be seen, that here operator are punished because the EASA/LBA her audit have not correctly followed, then acc. –Gadringer – the last EASA/LBA audit from 11-2009 are finished with –no – findings.

Commenter 36: TYROLEAN JET SERVICE - Hellmut Sztatecsny-19/01/2010

Comment # 36

As the subject PAD 10-010 has an effect on our entire fleet, we are not sure regarding the reason for this PAD.

We do use one of the named EASA approved maintenance organisations and are not willing to replace more than 80 seat belt assies for nebulous reasons.

If proven safety hazards exist (none named in the PAD) then the time frame of three month is unrealistic as the OEM's will not be able to manufacture thousands of seat belts in this time frame.

We have the impression that the reason is a pure commercial one, as the named OEM's fear loss of maintenance business as the named (only German?) maintenance organisations offer much better service!

At one of the named OEM's we had to wait 3 month for the repair of belts while one of the affected Part 145 Organisation could do the same task within one week.

We use this Part 145 facility for more than 20 years and had never any belt/restraint system item fail.

One other aspect is the reactive action of the propose AD.

How could an approved organisation work for decades under the supervision of an Aviation Authority and suddenly this approval is worthless!. Who issued this approval on which legal basis? If the authority issued an incorrect approval then the liability for the damages is with the authority and will draw a chain of legal actions.

Commenter 37 : Steffen Passmann – 19/01/2010

Comment # 37

Hierzu habe ich folgende Anmerkungen:

Die von der EASA aufgesetzte AD 10-010 ist für mich in weiten Teilen nicht nachvollziehbar. Zwar sollten bei der Wartung an luftfahrttechnischem Gerät auch alle formalen Anforderungen durch den LTB erfüllt sein/werden, es ist aber für mich unerklärlich, wo der plötzliche Druck (3 Monatsfrist) auf Erfüllung entsteht. Sind bei der Überprüfungen Mängel bei LTBs festgestellt worden, so sind diese natürlich abzustellen und von den Mängeln betroffene Halter zu informieren. Fehlten jedoch, trotz jahrelang gelebter Praxis, lediglich Unterlagen, so ist aus meiner Sicht dem LTB eine Frist zum Nachweis dieser zu gewähren und daneben sollte außerdem die Chance gegeben sein, nachzuweisen, dass diese Formalia in den bis dato erbrachten Leitungen bereits Umsetzung fanden.

Ein Austausch von Gurten, für welche es - alleine aus der Erfahrung der Vergangenheit - keinerlei Sicherheitsbedenken gibt, auf Kosten der Halter, halte ich für unverhältnismäßig. Aus diesem Grunde sollte für die laufenden Form One ein Bestandsschutz gelten, nach Ablauf können diese dann nur noch durch zugelassene Betriebe instand gesetzt werden.

Es steht doch außer Frage, dass die Wartung von fachlich versiertem Personal in guter Qualität erfolgte.

Commenter 38: - Horst Seifert - 19/01/2010

Comment # 38

In our gliding club we have seat belts manufactured by Autoflug, Schroth and Gadringer.

LTB Schlemann was our primary company for belt overhaul.

This LTB is licenced by LBA

All overhauled belts have an EASA-form.

According to our information there are no complains with Schlemann overhauled belts.

Our questions:

Since which date is EASA the only authority for this matter?

What happens to seat belts overhauled before that date?

Is LTB Schlemann still authorized to overhaul seat belts, because we have three sets of seat belts back from Schlemann last week, asking for a 700€ payment for his job?

It will break our neck, if we pay 700€ for nothing. Is it just a formality or is it a safety item?

Commenter 39 : Franz Redak – 19/01/2010**Comment # 39**

- a) You require in (2) to remove the belt or disable the seat. EASA implies with that statement, that each individual safety belt or torso restraint was repaired or maintained without having the necessary Maintenance/Repair Instructions of the OEM or else have an approved repair instruction in place. There are only two reasons for that possible:
1. EASA knows that there are no such maintenance or repair instruction available from the E/TSO holder; AND
EASA knows that these companies do not have another approved document available which is the basis for their repair (national approved document prior to EASA implementation), OR
 2. The companies in question do not hold an approval or are not capable to perform such maintenance or repairs as part of their P145 approval (Since repair or maintenance no POA necessary). I guess this cannot be proven by EASA at this point in time.
- b) The condition in a1) cannot be ruled out for seat belts not done to a E/TSO for example as part of an outfitting project (executive jets) where sometimes the belts are part of an STC. Since the current wording is not limiting to E/TSO equipment only...this would be not justifiable.
- c) Since the straps are usually E/TSO'd, such repairs could have done and accepted through a separate approval (See GM 21A.611) on a product (aircraft) level. Unfortunately this GM or P21 is not very specific what you do in such case with the E/TSO marking. It does not specifically tell that the marking has be removed (since being void) or replaced with an EPA marking.
- d) Economic: I know that some of these companies have been used by the industry for years... the impact of this AD would be rather hard on certain parts of the industry.
Imagine different coloured belts, buckles and locks in an executive jet. This is clearly giving the business and GA the most headaches due to small numbers and very exotic coloured belts. They would be effectively grounded for weeks.
I assume that the proposed AD is technically justified but is not based on real serious failures or accidents/injuries!
- Therefore ... reasonable time frames to comply....and NO disabling.

Commenter 40: Lutz Pritschow - 19/01/2010**Comment # 40**

As the owner of a recently purchased Fournier RF3, I have just bought a new set of safety belts from Gadringer. I am astonished and dismayed that EASA would consider implementing the above AD, without providing evidence that Gadringer has failed in their responsibility to the flying community.

Not only is the EASA setting a bad precedent, by randomly banning companies that have been in business for many years, from selling their (proven) products, but the impression being created, is that the EASA is favouring certain companies, to the detriment of the already financially burdened private pilot / owners.

I must object in the strongest terms to the apparently random way that this AD has been generated, and urge the EASA to delay implementation until clarification can be obtained from the now "blacklisted" manufacturers as to where exactly the problems with their products may lie.

Commenter 41 : Club Fournier International e V— Patrick Faucheron - 20/01/2010**Comment # 41**

I really fail to understand the meaning of this "proposed" A.D.

To my knowledge the exchange/overhaul of harnesses was only mandatory in Germany (after 11 years) although nobody and no single A/C owner could understand the real sense of this measure besides providing a good and healthy business to some companies.

In Germany some companies - certified by LBA- were specialised in that Harness Overhaul business. GARDRINGER and SCHLEMMANN to name a few of them are specialised in that job, refurbish "outdated" harnesses and supply the mandatory "EASA Form one".

According to this PAD all harnesses overhauled by third party companies named in the PAD would become Un-Airworthy and should be built out ...

???

On which planet do you live ? Or are you already on the pay list of some original belt vendors ?

This TBO for harnesses and belts is anyhow in the eyes of the whole aviation population a total nonsense. In order to remain credible you are sincerely invited to show the evidences, why belts and harnesses must be overhauled after 11 years.

Commenter 42: AVAG, FIVV, CFI Italy, Eugenio Lanza di Casalanza -20/01/2010**Comment # 42**

I do not know if the shops performing the safety belts overhaul (I personally know Schlemann because is the cheaper on the market) have "Approved maintenance data", so as I do not know if these "Maintenance Data" in form of a "Repair Manual" from the original manufacturer does really exist and are available to third parties, anyway all that is ridiculous, all these manufacturers use the same standards and the same webbing materials (by the way is the same material used on cars, probably from the same source). This AD will have a very high economical impact on small aircraft and gliders, especially in Germany where (I think only country in the world) an old AD obliges all aircraft owner to change/overhaul the belts each 12 years for a supposed "safety threat" due to lack of "Approved maintenance data". All these companies do this job from a lot of time, approved by the "Competent Authority" (LBA), and without any reported problem with the repaired belts. For that reason we

strongly disagree with this PAD, and suggest to find another way to solve the problem.

All these products are subject to the same TSO or JTSO or any kind of Standard you would apply (I think the ASTM would be exactly the same thing), so it should be possible to accept that if the overhaul is done in accordance with these standards it is acceptable by the authority (EASA).

And more, if the belts have been released to service under LBA approval, this should be grandfathered like all rights existing before.

Please think the impact of the effective AD before releasing it. We already are in a critical period with people with less money to spend, and doing so you will help to kill the G.A.

Commenter 43 : – DC Aviation GmbH - Jens Strohm - 20/01/2010

Comment # 43

From our point of view the published PAD 10-010 is not necessary. The relevant companies have worked according procedures that are approved by the German authority (LBA). Therefore this issue should be clarified between EASA and the LBA before an AD is issued.

Commenter 44: - Bernhard Blasen - 20/01/2010

Comment # 44

Until now there are safety belt manufacturers and safety belt maintenance organizations which can be but need not to be the same companies.

There is a license certificate for a maintenance company that permits service and overhauling safety belts manufactured by a particular company.

In future some companies must not service belts manufactured by "some" different companies, even if they have the license to do so. That seems weird for me!

For example Gadringer, Germany has the license to service Autoflug, Germany belts. According the PAD they aren't allowed to do it in future despite of their license to do it. Worse than that - owners of belts manufactured by Autoflug and recently overhauled by Gadringer are forced to replace those belts, even overhauled legally and with a FORM 1 certificate.

This will cause high costs for aircraft owners, especially owners of small plains like gliders, without having impact to safety! There has no documented event since more than 20 years, where a failing belt,, maintained under conditions this PAD deals with, had any impact to the results.

The only reason for the PAD seems to be a economical support program for a small group of privileged companies, improving their market situation against competitors.

Commenter 45 : – ADAC Luftfahrt Technik GmbH - Cornelius Schirm - 20/01/2010

Comment # 45

We herewith inform you that ACM made an excellent job on the harnesses in the past.

While all Manufacturers (f.e. AM-Safe, Autoflug) need between 10-16 weeks for a repair or O/H on subject units, ACM is able to do this within 7- 10 days and also the quality of their work convinced us to establish regular relationships to them.

From our point of view the PAD would lead to the situation that all of our ships have to be grounded immediately after AD is valid. We are not able to operate the A/C's from this time on, because it will take months to exchange all subject harnesses. Could take some more time, in the case the original Equipment Manufacturer is not able to support us with needed new parts to establish a rotatable pool while exchanging and re-work subject harnesses.

We recommend to give ACM the opportunity to apply for the certification and hold back the AD for this period of time. That would help all operators and ACM to come over this situation.

Thank You for giving us the opportunity to send in our opinion in this strange situation, before giving out the AD.

Commenter 46: C&M Marine Aviation Services Inc - Sali Barney -20/01/2010

Comment # 46

You did not list my company in this proposed AD as I am a manufacturer of seat belts and torso restraints as well with many customers around the world. Please advise, thank you

Commenter 47 : Wilhelm Tank GmbH & CO Mariensiel KG, Christian Tank - 20/01/2010

Comment # 47

Seit fast 30 Jahren verwenden wir Anschnallgurte die durch die Fa. Schlemann bzw. Gadringer gewartet bzw. repariert wurden.

In keinem Fall wurden uns während der Lebenszeit des Gurtmaterials Qualitätsmängel zugetragen, die auf Produktionsfehler o. ä. zurückzuführen wären.

Aus unserer Sicht ist es nicht schlüssig, warum wegen eines "Formfehlers" ein funktionierendes System (Überholung von Anschnallgurten nach Stand der Technik) ab sofort nicht mehr zulässig ist.

Zusätzlich ist es in dem von Ihnen angegebenen Zeitrahmen auch den Herstellern von Anschnallgurten nicht möglich diese hohe Anzahl von Systemen zu liefern, so, daß eine Vielzahl von Flugzeugen der Allgemeinen Luftfahrt nach dem Stichtag am Boden stehen wird.

Commenter 48: Stefan Jaudas -20/01/2010

Comment # 48

The glider club I am member off has 5 sailplanes in operation, each older than 12 years. This means, of the 7 seat places, 6 have re-built seat belts, some of them have been re-built several times. Only when an old seat belt becomes unserviceable, a completely new one will be bought.

Fortunately, most of our belts are Gadringer belts maintained by Gadringer.

Nevertheless, the aforementioned proposed AD is not acceptable.

Reasons:

As far as I know, no unsafe conditions whatsoever have been reported for re-built sailplane/ motorglider belts. Especially not for those rebuilt by Gadringer. So there does not seem to be a technical reason behind this PAD.

Therefore, it is not acceptable.

The companies listed in the PAD, especially Gadringer, have been rebuilding seat belts under full EASA and LBA approval and have done this for years. EASA would have to answer why it has approved of that business for years, and now suddenly makes a full turn-around and detects .

The PAD is obviously grounded on administrative reasons only. Maintenance as made by the listed companies obviously has been proper, controlled by the Authorities and approved by them.

The PAD is reatro-active. Past acceptable practice and accepted and certified parts are summarily declared not to be airworthy. Being a summary AD, it is not acceptable, either. As such, it is very vague and open to interpretation and misinterpretation. It should call out the aircraft types, seat belt part numbers and serial numbers affected, as well as the combination of original manufacturer/ maintenance company affected.

I would also like to point out that certain manufacturers (like Autoflug) have actually pointed out the listed companies as the proper place to have their belts maintained. reason was that these comapnies (e.g. Autoflug) are no longer producing or maintaining certain types of belts.

It is also meeting the eye that the four listed "rogue" maintenance companies are all German. It is not very convincing that only German companies should have this problem. There ought to be other companies with this kind of business in other EASA countries. If this PAD goes through as proposed, these other companies from other EASA countries would have the same problem and should be included in this PAD.

The will likely be no way to replace all affected seat belts whithin three months. This will very likely lead to massive numbers of aircrafts on ground, for no good technical or safety reason.

Commenter 49 : Luftsport Verband Bayern e.V., Axel Mitzscherlich – 20/01/2010

Comment # 49

please apologize but it is very sad that EASA plans to issue an AD in consequence of their own poor enquiry. As technical officer of the Luftsport Verband Bayern e.V. I represent all technical issues in maintenance on gliders, motorgliders, aircraft up to 2000 MTOM. We are approved as a Subpart F and G organisation, therefore I am familiar with those tasks.

I cannot understand why the whole industry and their customers should be punished now as just "on some maintenance organisations, ... have been maintained or repaired by maintenance organisations without holding approved maintenance data."

What are the flight safety reasons for this AD ?

What is the problem ?

There are no detailed substantiations that prove a flight safety problem. All organisations have been approved and certified by their NAAs since many many years. It now looks like that EASAs quality system to audit the NAAs and the industry does not fulfill the requirements to ensure that maintenance organisations proceed to EC Regulation 145.A.45 and the end customer will be punished for that.

This AD will not be understood by anyone.

Does EASA imagine what chaos this will initiate. Who will be able to change A L L Safety Belts and Torso Restraint Systems (and these companies have a big marketshare at least in Germany) in a timeframe of about three months only. EASA has been started in September 2003. Even if this AD would become effective, all parts which have a lifetime of 12 years, and have been overhauled before, cannot be affected.

I propose to limit this AD on those parts which are really affected and which might have a real flight safety problem and not to give a general directive.

This PAD makes me really sad and if it's not January I would say it is an "April Fool's Gag".

Sorry for my unfriendly manner, but you should work on EASAs acceptance in aviation and not on a bad reputation.

Commenter 50: - Deutscher Aero Club e.v. , Rudolf Schuegraf, 20/01/2010

Comment # 50

das ist wieder mal ein richtiger Axel. Sei mir nicht böse, aber so kommen wir, auch in dieser Angelegenheit nicht weiter. Leider spielt die Verpackung eine große Rolle. Auf die Inhalte werde ich morgen eingehen, es ist ein von mir in der Bundeswehr gelerntes Prinzip, erst nach Ablauf von 24 Stunden zu antworten, wenn Emotionen mit im Spiel sind.

Commenter 51 : – Alfred Spindelberger Fahrzeugtechnik GmbH, Alfred Spindelberger 21/01/2010
Comment # 51

This Regulation would destroy some companys (and would lead to the let of her employes) what since decades overhoul safety belts . All this repair companys never had any failure! The belt manufacturers will never give not out her own standards to others!

Commenter 52: Max Dietrich , -21/01/2010
Comment # 52

ich bin seit Jahren aktiver Segelflieger und Werksattelleiter in unserem Verein.

Wir lassen unsere Gurte seit Jahren bei der Firma Gadringer überholen und diese führt eine exzellente Arbeit aus. Die Gurte wurden mitunter auch von der Firma Schroth und Autoflug hergestellt.

Für uns würde dies bedeuten das alle diese Gurte ihr Zulassung verlieren, was mit enormen Kosten verbunden wäre.

Es wäre ein herber Schlag für den Luftsport in Deutschland, der bereits durch vorhergegangene Regelungen stark gebeutelt ist.

Zumal mir aus den vergangenen 20 Jahren keine Unfälle bekannt sind, die auf Fehlerhafte Gurte zurückzuführen waren oder eine Rolle spielten.

Es muss doch eine Möglichkeit geben die EASA Regularien zu verwirklichen ohne solch drastische Maßnahmen einzuleiten, ganz abgesehen davon, dass die Hersteller der Gurte bei der großen Masse kaum in der Lage sein werden, diese Maßnahme in vorgegebener Zeit umzusetzen.

Ich appelliere inständig an Sie, die Ad zu überdenken und zum Wohle des Luftsports zu entschärfen bzw. den Firmen Möglichkeiten zu geben, z.B. einen Nachweis über die Qualität der Überholten Gurte abzulegen.

Ist es nicht Möglich in solchen Fällen zu differenzieren in welchen Luftfahrzeugen die Gurte Verwendung finden?

Ich hoffe derweil auf den gesunden Menschenverstand und auf eine, in entsprechenden Verhältnismäßigkeiten gefundene Regelung!

Commenter 53 : MT AEROSPACE AG, Michael Okulla – 21/01/2010
Comment # 53

Ich halte es für maßlos übertrieben und ungerecht, unverhältnismäßig, unangemessen eine solche AD einzuführen. Bei keinem der Hersteller von Luftfahrzeuggurten, sind Unfälle/Störungen bekannt, auch nicht bei deren Instandhaltungen. Ich bitte Sie inständig sich die Konsequenzen und Folgen dieser unsinnigen und überflüssigen AD zu überlegen. Dies dient nicht zur Steigerung der Sicherheit in der Luftfahrt, sondern nur zur immensen Steigerung der Kosten, für alle Beteiligten, vor allem für die Kunden der Hersteller wie auch für die jeweiligen Hersteller selbst.

Commenter 54: Michael Kapp -21/01/2010

Comment # 54

ich schreibe diese Nachricht auf deutsch und hoffe, dass Sie sie trotzdem verwerten können.

Dies ist schon der erste Punkt, den ich kommentieren möchte: ich finde es sehr befremdlich, dass von der EASA Anweisungen und Veröffentlichungen, die auch deutsch zugelassene Flugzeuge und deren Halter betreffen nicht in deren Muttersprache veröffentlicht werden.

Wie soll ich davon Kenntniss bekommen und den Inhalt verstehen, wenn ich (mal unterstellt), der Sprache, oder zumindest der Fachtermini auf englisch nicht mächtig bin (und ich kenne genügend Flugzeughalter, deren Englisch noch schlechter ist, als meines). Ich möchte dies keinesfalls als nationalistisch verstanden wissen, sondern als reines Verständnissproblem von vielen Betroffenen.

Das aber nur am Rande, mein Kommentar zur o. g. PAD:

Ich finde es unerträglich, wenn solche Anweisungen -rückwirkend- auf dem Rücken der Flugzeughalter ausgetragen werden, die aus rein formalen Gründen, ohne sicherheitsrelevanten Anlaß ausgesprochen werden.

Zu dem Zeitpunkt als viele ihre Gurtzeuge, vermeintlich zulässig, überholen ließen, war von einer solchen Anweisung nichts bekannt.

Dadurch, dass diese Anweisung ergeht, wird das betroffene Gurtzeug technisch keinen Deut schlechter oder unsicherer, der Halter muss es aber nun ein zweites Mal bezahlen. Für mich als Flugzeughalter stellt eine solche Praxis ein echtes Ärgerniss dar, aber vielleicht kann mir das ja ein Mitarbeiter Ihrer Behörde einmal so erklären, dass auch ich das verstehe :-)

Commenter 55 : Paul Riedl – 21/01/2010

Comment # 55

unfortunately I cannot see a clear reason for this proposal other than sheer bureaucracy. Has professional review/repair/substitution of safety-belts ever caused serious danger to health or security? Most - if not all - of the mentioned companies did a great job on harness maintenance ever since. In the past, they obviously knew what they were doing since there was little or no trouble reported to the public. In the future, they may follow a new regulation which should include providing of necessary papers as required.

In the present, from a practical point of view, an AD which is only based on theoretical issues does not affect airworthiness at all. It would hardly gain anything useful while definitely producing a lot of cost and trouble.

To me as owner and pilot of a glider this proposal simply misses its target.

Commenter 56: Tyrol Air Ambulance, Thomas Praxmarer -21/01/2010

Comment # 56

regarding the above PAD we would like to inform you that:

We are completely content with the work from LTB Schlemann GmbH. The quality is excellent, the price is suitable and the turn around time is very short.

We cannot understand this PAD.

Commenter 57 : Haeusl Air-Technik GmbH, Florian Forst – 21/01/2010**Comment # 57**

I don't think this is the right way to handle the problem in that case.

Would it not be possible to check out the procedures, how the different Organisations did the overhaul from the seat belts? I mean they are doing the overhaul for a long time, and we obviously get always very good products back from them.

It would be a amazing cost factor to change all this belts alone over Germany. I guess the named Organisations have to give the credits for the Maintenance and also of course they have to make new belts for free.

This will kill some of them, and that should not be the case. They are specialists on belt manufacturing and overhaul, and it looks like that they did their manual job good in the past.

If the manufacture / overhaul process from them is equal or even better as described in the maintenance data, it should not be necessary to change and scrap all this good products.

Of course if there is a main difference in the procedures how they made it and how it is described in the appropriate maintenance data, then I see also a safety issue, but to clarify and understand this, a comment about the failure would be good in the AD.

Commenter 58: WDL Aviation GmbH & Co. KG, Gabriel M. van der Bol -21/01/2010**Comment # 58**

We herewith complain officially against this Proposal, because it is in our opinion against regulation and approval,

WE are astonished about the PAD 10-010 and would like to comment as follows :

All German Companies Noticed in mentioned PAD are all since Years LBA / EASA approved repair stations for Safety Belts / Torso Restraint Systems - Inspections

we as maintenance facilities follow instructions and airworthiness requirements issued by the LBA (national) and EASA.

In accordance (NFL II - 83/99) we are obliged to change all Safety Belts / Torso Restraint Systems every 12 Years which is only a requirement for safety in Germany

in case we order Safety Belts / Torso Restraint Systems via our suppliers we often get Safety Belts / Torso Restraint Systems delivered systems which doesn't comply to National regulations. (12 years since manufacturing)

the only reliable possibility for repair or renewal of Restrain systems was up to now for us via the mentioned approved companies :

- LTB Schlemann ,
- ACM Aircraft Cabin Maintenance GmbH,
- Gadringer Gurte GmbH, and
- R & S Aircraft Service.

Now by the proposed AD, and your herewith say that the approved issued certificates of all the equipment repaired / inspected or renewed by these Approved companies has to be removed from Aircraft !!!

In this case this would mean that in 3 month from now we have to ground all our aircraft. (if equipment installed)....which can not be the case, because the companies and the works performed are all Approved by

EASA/LBA

We herewith complain officially against this Proposal, because it is in our opinion against regulation and approval, and this is not conform with the principle of open markets in the EU, it seems to be a step back to monopolism Pls comment

Commenter 59 : Inga Willenbrink – 21/01/2010 - Stefaan Deroover 02/02/2010 - Hans-Joachim Ebest – Michaela Schoeters 03/02/2010 04/02/2010 – Kai Wittneben 06-02-2010 - J. Schoeters 06/02/2010

Comment # 59

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the German aviation.

Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time.

Let alone providing new ones.

As you can see, this AD is not acceptable for all operators and users of aviation witnesses.

Incredible, this AD should not be valid.

Commenter 60 : Rüdiger Janß – 21/01/2010

Comment # 60

for several years companies like Gadringer or Schleemann did a good job manufacturing and maintaining Safety belts. All this was supervised by the LBA, the companies had the approval by LBA (LTB) and the equipment was delivered with the documents needed to be legal (Form One). I am sure these company had to have installed an QS system (e.g. like ISO9000) to ensure quality, to get the LBA approval. As far as i know there was never a complaint about the quality delivered by these companies, which resulted in an german TM/LTA. I guess this was the same in other european companys.

Right now this is stated by EASA not to be good enough anymore and means for thousands of belts used even in simpel general aviation planes like gliders, the belts have to be rened within a rather short period.

As i understand the AD is not about the quality delivered, but about the fact that e.g. Gadringer or Schleemann did not have the original maintenance data from other suppliers to repair belts from other suppliers.. This is typical as these companys are competitors.

I think that this AD is exaggerated for these reasons:

- the AD is dealing not only with new belts / renewed belts but also with those maintained in pre EASA times (can be more than 10 year old equipments as TBO is 12 years) ,
- is forcing all owners of such safety belts to buy new ones within a very short time, which probably will not be able in the 3/3 month period (check / replace)
- generates extra cost for general aviation, even the equipment is not concerned to be bad, in my eyes its just a problem with the paperwork
- as i understand the AD even original Gadringer belts maintained/renewed by Gardinger may not be used anymore (same with Schleemann original / Schlemann repair) even so these companys should have the knowledge to maintain or repair the belts they had produced.
- there has to be made a difference what has been replaced / maintained only the textil or parts of the buckle

All in all i have the impression that this AD was triggered by trouble between competitors, trying to use EASA to help them improve their buisiness.

Commenter 61 : – Daniel Fest - 21/01/2010 - Lorenz Strasser, Florian Gang - 29/01/2010

Comment # 61

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the German aviation.

Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time.

Let alone providing new ones.

As you can see, this AD is not acceptable for all operators and users of aviation witnesses. This AD should not be valid.

P.S. Und nun eine Anmerkung auf Deutsch.

Seit dem die EASA mitverantwortlich für die allgemeine Luftfahrt in Deutschland ist (Prüfwesen, Lizenzwesen, Aufsicht,...) wurde nichts besser. Gerade für Segelflieger wurde alles komplizierter und teurer und nicht der Praxis angepasst. Ich denke an da an das Prüfwesen der Camo, die Dokumentationen (EG Nr. 216/2008), LTA und TM die man sich teuer erkaufen muß (EASA Form 1 oder Zwangsserviceverträge die bei DG-Flugzeugbau die von EASA gewilligt worden sind.) Aber auch das Lizenzwesen (Gültigkeiten, Erneuerungen,...) sind komplizierter und unübersichtlicher geworden. Ich sehne mich nach den alten Zeiten, als nur das LBA Partner der all. Luftfahrt war.

Commenter 62 : MTA Aviation, Michel Huici – 21/01/2010

Comment # 62

Nous sommes atelier de maintenance Part 145 FR.145.225 en Aviation Générale, nous venons vers vous concernant les safety belts traitées dans cette PAD:

1/ Nous sommes très étonnés car nous travaillons avec Gadringer Gurte depuis plus de dix ans, ce fournisseur travaille efficacement, les matériels traités étaient toujours de fini irréprochable, les documents de suivi également.

2/ Vous n'expliquez pas quel est le problème rencontré. Cela n'est pas justifiable commercialement auprès des clients.

3/ Nous sommes très étonnés que tous les fournisseurs incriminés soient Allemands.

Si ce n'est donc pas un problème technique de fabrication (pas dans 4 ateliers en même temps !)

Il apparaît que cela est donc un problème administratif de suivi de conformité de ces ateliers.

Dans ce cas, cela doit donc être l'autorité qui est responsable.

C'est donc dans ce cas au LBA d'assurer financièrement ses erreurs.

4/ Le remplacement de ces ceintures est une catastrophe pour les exploitants.

Cela va avoir un coût très important additionnés et liés à des problèmes de disponibilité, car beaucoup des ceintures révisées équipent des aéronefs dont les constructeurs ont arrêté la fabrication (ex. Socata Rallyes, Apex) ou épisodique (Pilatus PC6) et dont le stock de pièces d'origine est inexistant. Trois mois de délai proposé est impensable.

Commenter 63 : Alexander Ciliox – 21/01/2010

Comment # 63

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved.

There are considerably consequences for the German aviation. The aircraft holders have act as described by the LBA. There will be no technical changes in the overhol of the safety belts.

Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time.

Let alone providing new ones.

As you can see, this AD is not acceptable for all operators and users of aviation witnesses.

This AD should not be valid.

This AD does not effect the safty in general aviation. It is only an coffin nail for the european aviation....

Commenter 64 : Dr. Herbert Pirker – 21/01/2010

Comment # 64

I am really astonished about EASA's procedure regarding EASA PAD 10-010 and therefore raise severe objections against this PAD.

For more details:

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts.

I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the German aviation.

Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time.

Let alone providing new ones.

As you can see, this AD is not acceptable for all operators and users of aviation witnesses.

This AD should not be valid.

Therefore, please, reconsider your actions.

In addition, for your information about the common opinion on this subject:

Die bei der EASA geplante luftfahrttechnische Anweisung (Proposed Airworthiness Directive, PAD No. 10-010) vom 13. Januar zu Sicherheitsgurten hat in der Allgemeinen Luftfahrt wie der Verkehrsluftfahrt einen Sturm der Entrüstung ausgelöst. Betroffen sind Gurtsysteme in der Größenordnung von einer Million Stück! Der Schaden beziffert sich auf einen mehrstelligen Millionenbetrag, sollte die PAD wie geplant in Kraft treten. Und das nur, weil die EASA ihrer eigentlichen Aufgabe als Aufsichtsbehörde nicht nachkommt. Bis zum 10. Februar kann die PAD noch per E-Mail kommentiert werden.

Besonders betroffen ist die Allgemeine Luftfahrt und der Luftsport in Deutschland, denn nur in D-zugelassenen Luftfahrzeugen sind die Sicherheitsgurte mit der NfL II-83/99 auf eine Lebenszeit von zwölf Jahren beschränkt. Viele Halter haben nach Ablauf dieser Zeit die Anschnallgurte ihrer Flugzeuge bei Wartungsbetrieben mit neuen Gurtbändern ausstatten lassen, was deutlich preiswerter ist als der Neukauf einer kompletter Einheit inklusive Schloss und Metallschäkeln. Ähnlich wie Privathalter verfahren auch viele Airlines, sie lassen unansehnlich gewordene Sitzgurte mit neuen Gurtbändern versehen.

Die deutsche Sonderlösung der Lebensdauerbeschränkung von Anschnallgurten hat gerade in Deutschland einen neuen Markt und eine spezialisierte Wartungsindustrie entstehen lassen. Von der luftfahrttechnischen Anweisung sind deshalb ausnahmslos deutsche Betriebe betroffen.

Es ist ein reiner Formalismus und damit eine riesige Geldverschwendung, weshalb jetzt allen, einmal bei den Wartungsbetrieben (LTB Schlemann, ACM Aircraft Cabin Maintenance GmbH, Gadringer Gurte GmbH und R & S Aircraft Service) instandgesetzten Gurten die Zulassung entzogen werden soll. Die EASA hat festgestellt, dass den betroffenen Wartungsbetrieben nicht die Wartungsunterlagen (approved maintenance data) der Hersteller zur Verfügung stehen, also die herstellerseitige Beschreibung, wie die Gurtbänder zu wechseln sind. Die Arbeiten entsprechen demnach nicht den Formalien, worauf die EASA nun nur lapidar feststellt, dass so gewartete Gurte ausgetauscht werden müssen. Und das, obwohl den betroffenen luftfahrttechnischen Betrieben durch die Zulassung durchs Luftfahrt-Bundesamt nach Part 145 bestätigt ist, sachkundig entsprechende Wartungen und Reparaturen vornehmen zu können. Fälle, in denen die gewarteten Gurte versagt oder sich in irgendeiner Weise als unsicher erwiesen hätten, gibt es nicht.

Statt alle Verantwortung bei den Flugzeughaltern abzuladen, wäre es vornehmste Pflicht der EASA, bei den Herstellern auf eine Einhaltung der gesetzlichen Vorgaben zu drängen. Die „approved maintenance data“ müssen die Hersteller nach europäischer Gesetzeslage (Part 21) den Eigentümern und Nutzern zur Verfügung stellen, damit diese die Produkte lufttüchtig erhalten und reparieren können! Hier mauern die Hersteller. Statt aber die Hersteller zur Einhaltung der gesetzlichen Vorschriften zu bringen und damit zur Herausgabe der Unterlagen, wählt die Behörde den völlig inakzeptablen Weg, ignoriert die Rechtslage und schiebt alle Verantwortung den Flugzeughaltern zu!

Der Schuss vor den Bug, den das europäische Parlament der EASA erst kürzlich verpasst hat, den Gesetzesrahmen kundenfreundlicher zu gestalten, scheint seine Wirkung bereits eingebüßt zu haben. Die Proposed Airworthiness Directive ist ein bequemer Rückzug ins Formalistische, der den Konflikt mit den Herstellern vermeidet, stattdessen alles dem Endkunden aufbürdet.

Wichtig ist jetzt, der EASA zu zeigen, wie groß die Zahl der Betroffenen ist, die nach der vorgesehenen AD zu massiven Investitionen gezwungen wären, ohne dass die Luftfahrt damit auch nur einen Deut sicherer wird. Ganz abgesehen davon, dass in der vorgesehenen Frist von nur drei Monaten es unmöglich sein wird, alle betroffenen Gurte auszutauschen. Viele Flugzeuge würden dann unklar und müssten am Boden stehen bleiben!

Die Kommentierungsfrist (ADs@easa.europa.eu) läuft noch bis zum 10. Februar. Gerhard Marzinzik 21.01.2010

Commenter 65 : Peter Strube – 21/01/2010

Comment # 65

as an affected aircraft owner I looked over Your above mentioned PAD.

Could You kindly explain to me what You intend to achieve with this PAD?

You intend to demand documentation that has never been made by the responsible manufacturers.

You intend to punish the workshops on behalf of the manufacturers.

You intend to ignore the Luftfahrtbundesamt, which provided the necessary instruction on behalf of those manufacturers.

You intend to declare approvals invalid, which have been made before the EASA took responsibility.

Commenter 66 : Fluglehrer und Werkstattleiter im LSV-Geratschhof, Ralf-Henning Glomb – 21/01/2010

Comment # 66

Dieser AD liegt kein Incident und auch kein Accident zugrunde.

Die AD betrifft auch die Überholung von Sicherheitsgurten aus "vor EASA Zeiten", die zu diesem Zeitpunkt in Deutschland von den deutschen Behörden genehmigt und damit legal waren.

Nach welchem Recht kann die EASA diese durchgeführten Arbeiten nachträglich für ungültig erklären, insbesondere da kein Incident/Accident vorliegt.

Zukünftige Änderungen/Klarstellungen wären nachvollziehbar und verständlich. Rückwirkend, ohne konkrete Anhaltspunkte für eine Sicherheitsgefährdung, erscheint mir diese Maßnahme nicht angemessen.

Commenter 67 : Ernst Heinen – 21/01/2010

Comment # 67

The PAD if issued will have an enormous impact on general aviation in Germany and elsewhere. Hundred of thousands of safety belts will be affected. This will add unnecessary costs to airplane holders, will not increase safety, and further moves interested persons away from aviation.

Unbalanced: Only seat belts from certain manufactures are affected. Only four German maintenance organizations are affected.

Disproportionate: These maintenance organizations were approved by you under part 145 and worked under supervision of the country authorities or the EASA for many years without any issues. There have never been any safety issues with maintained or repaired safety belts.

Instead of pursuing this PAD you should rather do your job and address the root cause that manufactures authorized by you are not providing the maintenance data approved by you to the maintenance organizations approved by you. Please reconsider pursuing PAD 10-010.

Commenter 68 : Thomas Willenbrink – 21/01/2010

Comment # 68

as a member of the committee of my gliding club Aero-Club Langenselbold in Germany I'm deeply concerned regarding your proposed AD 10-010.

Wintertime is the time for us, where club members prepare our gliders for the coming season. We also spent a lot of effort to train our pilots in order achieve one overall aim: SAFETY in our gliding activities !

Now EASA comes and publishes PAD 10-010 thwarting our continuous efforts regarding safety.

Application of PAD 10-010 is

- expensive
- without any proof with respect to measurable enhancement of safety
- bureaucratic
- will ground our glider fleet right at the beginning of the coming season

"Unfortunately" the safety belts in all our gliders have been maintained - to our full satisfaction - by LTB Schlemann, which is addressed by your AD-proposal. With thousands of affected belts the awaited overhaul rush will take month for the overhaulers to complete. In no way a 3-month period is sufficient to process all affected belts, by that grounding a whole fleet of aircrafts.

As given under "Reason" of the proposed AD EASA simply states "... EASA was made aware...". Not the smallest evidence of a restraint system failure due to maintenance failure is given in the AD, i. e. no proof for safety improvement can be given at all !

So EASA, please :

- o WITHDRAW PAD 10-010 !
- o BE CONCERNED OF PILOTS SAFETY, NOT OF FILLING MANUFACTURERS POCKETS !
- o PUT POTENTIAL GAIN OF SAFETY IN RELATIONSHIP TO COST/EFFORT

Commenter 69 : EUROCOPTER Deutschland GmbH , Peter Stahl – 21/01/2010

Comment # 69

Basically, I understand, that this AD addresses safety belts /Torso Restraint Systems which have been repaired and maintained without approved procedure issued by the TSO holder.

authorised (E)TSO approval holders, have been maintained or repaired by maintenance organisations without holding approved maintenance data.

EC Regulation 145.A.45 requires that (E)TSO approved parts and appliances can be maintained or repaired only if approved maintenance data provided by the (E)TSO approval holder are used, pending the loss of validity of the

- 1) (E)TSO approval and installation onto the aircraft.

Comment:

In case of non-availability of approved TSO holder procedure for maintenance and repair, it has been and still is a valid approach that maintenance and repair can be performed applying an "alternative" procedure which is validated and accepted by the airworthiness authorities. The German LBA has admitted such a procedure regarding overhauls in the past which remain still valid.

Release of part after overhauls have been performed by certified PART 145 companies.

Hence, no loss of flight worthiness of such part can be seen.

2) Comment:

Overhauls have now been performed following the "alternative" procedure for at least 25 years without jeopardising the occupant safety.

Hence, it has been proven by long-term flight experience and non- reported defects that there are no failure occurred.

Such argument is only useful to exaggerate a minor formal problem which I my opinion is not a reliable working star

3)

Required as indicated, unless previously accomplished:

- (1) No later than 3 months after the effective date of this AD, inspect the markings of safety belts and torso restraint systems, to determine if they have been maintained or repaired by one of the following organisations:
 - LTB Schlemann ,
 - ACM Aircraft Cabin Maintenance GmbH,
 - Gadringer Gurte GmbH, and
 - R & S Aircraft Service.
- (2) If the safety belts and torso restraint systems have been maintained or repaired by one of the organisations mentioned in paragraph (1), within 3 months after the inspection carried out in accordance with paragraph (1) of this AD, remove the safety belts and torso restraint systems and replace them with serviceable parts, or make the relevant seat inoperative.
- (3) After the effective date of this AD, do not install safety belts or torso restraint systems on any aircraft, unless in compliance with the requirements of this AD.

Comment:

As flight safety is not improved nor it is necessary technically (only formally), there is no need to progress this topic in short time.

A 3 month period is far too short and seems not to be feasible considering the existing capacities.

Summarizing,

- The German LBA has approved such overhauls in the past (alternative to TSO-holder procedure)
- No problems with regard to flight safety for at least 25 years.
- Too short period as flight safety is neither affected nor improved technically
- Pure formal "paperwork" aspect – (as confronted every day in my business)

Conclusion:

I recommend to skip this AD. AD should not become valid.

Beside such AD are not acceptable for all operators and users of aviation witnesses, it will not improved the EASA authority reputation on customer side.

Hope, my comments and recommendations will support you in your final decision.

Commenter 70 : Heiko Hering - 22/01/2010

Comment # 70

I found the above PAD open for comments until 10th February 2010 and would like to offer my sceptic arguments in regards to this PAD.

The German LBA has admitted safety belt and torso restraint systems overhaul procedures in co-operation with the named German overhaul companies for ages and the procedures in place have in no single case resulted into any kind of trouble.

This alone should show the effectiveness of the procedures developped togetehr with licensed overhaul companies and there is no how ever

remote sign of safety concern ahead.

From my point of view it is by no means understandable in what manner the overall security can be improved, if only four German companies are concerned by this AD. As exactly these four companies are well reputed for excellent and trouble free (and even LBA acknowledged) repair or overhaul procedures.

There are considerable consequences for the German aviation and overhaul companies without any indication of a problem. Apart from the fact that no improvement of safety is foreseeable by this PAD, there probably would also not be enough capacity to overhaul the restraint systems in a short time, let alone providing new ones.

So basically this PAD directs to grounding many central european aircraft just due to lack of new restraint systems or not enough overhaul capacity.

As the most important task of Ads is to improve the safety of flying this should have top priority and with this PAD there is no safety gain. Therefore this AD should not become valid.

Commenter 71 : Peter Wilken – 22/01/2010

Comment # 71

ihr seid ja nicht mehr ganz klar im Kopf.

Es wird Zeit, das die Europaorganisationen EASA weiter klein gefahren und Kompetenzen entzogen werden.

Wenn ihr glaubt mit unsinnigen Technischen Mitteilungen die Bürger terrorisieren zu können, dann seid ihr auf dem Holzweg.

Diese PAD No.: 10-010 [Correction: 14 January ist der größte Unsinn den ein Bürokrat verzapfen konnte. Diese Leute gehören sofort entlassen.

Commenter 72 : Gustav Remschnig – 22/01/2010

Comment # 66

It is not understandable why only these companies are affected. This AD must not take effect. Gadringer Belts have a very high quality

Commenter 73 : Martin Mitrega – 22/01/2010

Comment # 73

the planned AD will cause significant effect on our financial situation of our airports club. Moreover, the reason why the correction should be done is totally unjustified. All belts were embedded by authorized and well-experienced companies.

It is therefore not justified to release such a correction AD.

The financial result of such an AD, is threatening the existence of many aviation companies and clubs.

Commenter 74 : Air Berlin PLC & Co. Luftverkehrs KG , Michael Reisenleutner – 22/01/2010**Comment # 74**

I reviewed the PAD No.: 10-010 published on 13.01.2010 and corrected on 14.01.2010.

First I want to say that Air Berlin doesn't send seat belts to one of the four repair station listed in this PAD, I want to comment this PAD only as I see no technical reason for this AD, I see only a commercial reason for it.

Some seat belt manufacturer write in there approved CMM that a repair can only be done by a repair station authorized by the manufacturer. This is a commercial issue and not a technical issue as long as the repair station uses the correct CMM and they are approved by an EASA authority like the German LBA. To my knowledge the LBA isn't aware of any technical problems of a seat belt repaired by one of the four repair stations listed in this PAD. In the approval process to get a Part-145 approval, the repair station must demonstrate that they have a process in place to keep there records up to date according AMC 145.A.45(g). During postal audits done by our quality department this is one point of inspection. We had never any issue that a company listed on this PAD and was audited by Air Berlin failed to demonstrate this.

As the repair stations have to have a system in place to get the actual revision of the approved manufacturer's documents and the repair stations are approved by an EASA authority to repair these seat belts, I don't see a technical reason to publish such kind of AD. The commercial point behind shouldn't be the reason for EASA to publish an AD. If there are technical objections behind, it should clearly pointed out in the PAD.

Commenter 75 : Sebastian Dirlam – 22/01/2010**Comment # 75**

Concerning your (P)AD 10-010 I will circumvent some for me very astonishing facts:

1st: Why are the only 4 organisations named in point "Required Action(s) and..." all located within germany? Is this bad luck, or anything else?

2nd: After 40 years of service with zero (!!!) casualties or incidents, only having a look at the company "Gadringer Gurte GmbH" for example, *why do the owners of aircrafts in which Gadringer safety belts are in use*, *have to remove them*? Even if the safety belts should only have been in inspection / repair at the company where I bought them.

And finally: Why are only a few OEM concerned about this (P)AD? Why not all of the safety belt manufacturers within Europe?

Sorry for the probable inconvenience I may have caused

Commenter 76 : HB-Flugtechnik GmbH, Robert Auer – 22/01/2010**Comment # 76**

bitte nehmen Sie nachstehend unsere Meinung zum Inhalt der EASA PAD-10-010 zur Kenntnis :

wir halten die Reaktion der EASA zu diesem Thema als überzogen da es sich bei der Firma Gadringer um einen nach Part-21 und Part-145 zertifizierten Betrieb handelt welcher im Zuge seiner Zertifizierung sicherlich den seitens der EASA geforderten Standard erfüllte und aufgrund der aufrechten Bewilligung auch noch führt. Zwar erachten wir es als prinzipiell sinnvoll und notwendig gegen Approved Data (wobei wir grundsätzlich das vom LBA genehmigte Verfahren als Approved Data ansehen) zu arbeiten, man sollte aber funktionierende, generische Verfahren (welche zum Teil auf nationaler Ebene von der zuständigen nationalen Behörde genehmigt wurden) und sich bewährt haben als nichtig zu erklären. Besonders in der kleinen Fliegerei (ELA1-Klasse) scheint vieles auf die Schiene der Überreglementierung gebracht worden zu sein . Wird die PAD zur AD umgewandelt bedeutet dies einen erheblichen Kostenaufwand für die Kunden, die Wartungsbetriebe und als auch ev. für den Gurte-Reparaturbetrieb , was allerdings die Sicherheit nicht erhöht . Der Standard und die Sicherheit waren bei der Firma Gadringer gegeben !

Commenter 77 : W.Reith – 22/01/2010

Comment # 77

vorweg ganz kurz und offen: Wie hier von der EASA verfahren wird, lässt bei mir als betroffenen Flugzeughalter nicht nur das Grausen aufkommen sondern auch jeglichen Glauben und jede Hoffnung an eine auf europäischer Ebene sinnvoll und bürgerfreundlich funktionierende Bürokratie verschwinden. Das ist mehr als traurig. Das ist ein beschämendes Armutszeugnis.

Sachstand: Das Gurtmaterial von Anschnallgurten im Flugzeug muss in periodischen Intervallen ersetzt werden (m.E. eine absolut sinnlose Regelung, aber bei bürokratischen "Regelung" nach dem Sinn zu fragen ist auf jedem Fachgebiet eine furchtbare Enttäuschung. Und ist es nicht so, dass diese Regelung eine überhaupt nur in Deutschland angewandte Fehlleistung ist?).

Nun macht man über Jahre diesen - Entschuldigung- ausgemachten Blödsinn mit, ein paar Firmen spezialisieren sich auf diese Tätigkeit und die soll nun nicht mehr in Ordnung sein? Wenn eine Firma selbst als Gurtzeughersteller und Instandhaltungsbetrieb ZUGELASSEN ist, über Jahre Gurte vernäht, muss man mit hoher Wahrscheinlichkeit davon ausgehen, dass die diesen m.E. relativ simplen Arbeitsprozess durchschaut haben und in gleichbleibender Qualität anbieten können. Und das Ergebnis gibt meiner Vermutung recht: Es ist anscheinend KEIN Fall bekannt, wo irgendein Schaden durch mangelhafte Verarbeitung des Gurtmaterials bei den Austauschgurten eingetreten ist. 100% Sicherheit, ein Traumwert, nicht mehr zu verbessern. Aber bei der EASA sieht man "Handlungsbedarf"

(ist das nicht vollkommen absurd?) um etwas, was unter dem Sicherheits- und Funktionsaspekt nicht mehr besserbar ist- ja um was eigentlich zu erreichen?

Die lästigen Privatflugzeuge zu grounden, denn dann wird bei denen auch an allen anderen Stellen die "Sicherheit" die 100% erreichen, ja sogar den unkalkulierbaren Faktor "menschliches Versagen" kann man auf diese Weise eliminieren, wenn kein Flieger mehr bewegt wird, kann man nix mehr falsch machen. Ist das das übergeordnete Ziel?

Der Hintergrund dieser Aktion sind doch wirklich unübersehbar ökonomische Interessen der Hersteller der Originalprodukte -mit Sicherheit hat das nicht mal rudimentär zu tun.

ABER: Diese Hersteller wären verpflichtet -zumindest entnehme ich dies den Publikationen in Luftfahrtzeitschriften so- geeignete Wartungsunterlagen den Nutzern/Betreibern zur Verfügung zu stellen -das tun die aber nicht!

Dieser Rechtsbruch wäre auf ganz wunderbar einfache Weise zu ahnden, einfach den Verkauf der nicht durch geeignete Wartungsunterlagen legitimierten Produkte untersagen, das wäre eine schöne Übung für die EASA gewesen. Statt aber die -nochmals Entschuldigung- kriminellen agierenden Hersteller an Ihre Pflicht zu erinnern und in geeigneter Weise Druck auszuüben übt die EASA den Druck auf die Endverbraucher aus. Dieses Verhalten ist weit, weit von dem entfernt, was ich in einer funktionierenden Demokratie von einer Behörde erwarten würde. Hier ist etwas

faul, nicht im Staate Dänemark sondern in der EASA. Und es müffelt bis in mein Kellerbüro.

Commenter 78 : HeliDax, Philippe Souchard – 22/01/2010,

Comment # 78

Merci de nous indiquer ce que vous comprenez : « if maintained », la traduction en Français est « maintenu », c'est-à-dire en stock, fabriqué ?
Thank you to state to us that you understand: "is maintained", the translation in French "maintenu", i.e. in stock, manufactured?

Commenter 79 : Volker Polhaus – 22/01/2010

Comment # 79

do not see a single case were a complaint in the quality of a serviced safety belt occurred.
The mentioned organisations worked without complaint and this PAD 10-010 will bring no additional safety but only bureaucracy, cost and frustration.
I am the owner of a glider and unfortunately are ruled by your organisation.
EASA frustrates.

Commenter 80 : HeliDax, Philippe Souchard – 25/10/2010

Comment # 80

Thank you to state to us that you understand: "is maintained", the translation in French "maintenu", i.e. in stock, manufactured?

Commenter 81 : Bassalti Stefano – 25/01/2010

Comment # 81

I do not know if the shops performing the safety belts overhaul (I personally know Schlemann because is the cheaper on the market) have "Approved maintenance data", so as I do not know if these "Maintenance Data" in form of a "Repair Manual" from the original manufacturer does

really exists and are available to third parties, anyway all that is ridiculous, all these manufacturers use the same standards and the same webbing materials (by the way is the same material used on cars, probably from the same source). This AD will have a very high economical impact on small aircraft and gliders, especially in Germany where (I think only country in the world) an old AD obliges all aircraft owner to change/overhaul the belts each 12 years for a supposed "safety threat" due to lack of "Approved maintenance data". All these companies do this job from a lot of time, approved by the "Competent Authority" (LBA), and without any reported problem with the repaired belts. For that reason we strongly disagree with this PAD, and suggest to find another way to solve the problem. All these products are subject to the same TSO or JTSO or any kind of Standard you would apply (I think the ASTM would be exactly the same thing), so it should be possible to accept that if the overhaul is done in accordance with these standards it is acceptable by the authority (EASA). And more, if the belts have been released to service under LBA approval, this should be grandfathered like all rights existing before. Please think the impact of the effective AD before releasing it. We already are in a critical period with people with less money to spend, and doing so you will help to kill the G.A.

Commenter 82 : Christian Ronge – 25/01/2010

Comment # 82

I just became aware of the Proposal mentioned above and I would like to know if there is any indication for poor maintenance carried out by the listed organisations. As far as I know they have performed quite well for many years. I understand that approved maintenance data is important and EASA takes care that all safety belts will be checked in accordance to those rules in the future.

As long as there is no actual proof of safety risk due to this special situation, I think there is no need for additional safety inspection of belts:

- The short time period required in the PAD would make it difficult for everyone to have his safety belts inspected
- This would, once again, bring additional costs to clubs who already have to deal with expenses for ELTs, Transponders and other more or less safety enhancing rules. I hope, you will give a second thought to this PAD.

Commenter 83 : British Gliding Association, Pete Stratten– 25/01/2010

Comment # 83

Please find attached a comment regarding EASA PAD 10-010 from UK.MG.0279. Please confirm receipt. [PDF attachment]

The British Gliding Association represents some 2500+ sailplane owners in the United Kingdom. The proposed AD 10-010 presents a significant economic impact on many sailplane owners. We estimate that in the UK there could be 200 sailplanes affected with a unit cost per seat averaging €425 for a 4 point harness plus any maintenance workshop costs. The design requirements for sailplane safety harnesses are clearly specified in CS-22.785. The repair of safety harness webbing is a reasonably simple process as it involves replacement with the same specification material. The stitching, if not available in a component maintenance manual, reverts to a standard practice. We understand that CMM data is generally not available for sailplane safety harnesses. We understand from Gadringer Gurte GmbH that the repair procedures were previously approved

by the LBA. PAD 10-010 does not identify a safety issue. We are unaware of any problems experienced by aircraft owners with regard to repaired safety harnesses over the many years Gadringer and others have been repairing them for sailplane owners. It is wholly inappropriate and disproportional to force owners to remove reconditioned harnesses unless EASA has a genuine unsafe condition that would warrant doing so. The BGA recommends that the PAD is modified as follows; (2) If the safety belts and torso restraint systems have been maintained or repaired by one of the organizations mentioned in paragraph (1), within 3 months after the inspection carried out in accordance with paragraph (1) of this AD, inspect the safety belts and torso restraint systems and where any damage or fault is apparent, replace them with serviceable parts, or make the relevant seat inoperative.

Commenter 84 : AIR EUROPA, Bartolomé Quetglas – 25/01/2010

Comment # 84

On behalf of Air Europa Líneas Aéreas and regarding EASA PAD 10-010 concerning seat belts and torso restraint systems, we would like to point out the following:

- ACM Aircraft cabin Maintenance GmbH informed to Air Europa that indeed they had access to Component Maintenance Manuals (CMM's). It means that there is apparently a disagreement with the current reason for PAD 10-010, where it is stated that safety belts have been maintained without holding approved maintenance data.
- This PAD 10-010 informs about a procedure violation but is not identifying an unsafe condition. It means that this PAD is not taking into account the safety condition of the seat belts, only that they were repaired or maintained using apparently incomplete data. A safety belt in which it has only been replaced the identification label is also affected by this AD. In this case, the PAD is going beyond the scope of Part 21A.3B paragraph (b), provided an unsafe condition has not been determined. There has not been any in service failure of any seat belt according Air Europa experience. To our understanding, only belts with not valid repair with evidence that is causing an unsafe condition shall be referred to in the final AD.
- This PAD is not providing an effective solution for the affected seat belts. No action is specified for all the seat belts that should be removed from the aircraft. Air Europa wonders if these removed seat belts could be maintained or inspected using existing instructions (and not published by the OEM but already existing) or if they could remain in quarantine until data used for repairs have been approved. Air Europa considers that instructions to replace the webbing should be provided as part of the final AD wording. In fact, as an example, the excerpt from AMSAFE Abbreviated CMM 25-24-27 for Part No. 504681-SERIES, under paragraph 'REPAIR' states the following:

QUOTE

"The assembly may not be disassembled, further repair of this system may only be carried out by AMSAFE INC. (USA), AMSAFE LTD (UK) or an AMSAFE-approved repair station"

UNQUOTE

This kind of statements is against Part 21A.609 Obligations of holders of ETSO authorizations, paragraph (d). The repairs are existing and are not made available to the users. If EASA is concerned for an unsafe condition, the existing repairs under the control of ETSO holders shall be published in the final AD as a corrective action, for the public interest. With the current wording of just scrapping the affected seat belts EASA is transferring all costs only to airlines. Some maintenance organizations violated the maintenance procedures and the ETSO holders does not publish the repair instructions going against Part 21A.609 and are the airlines, even fulfilling the regulations, the organizations that have to bear replacement costs. The fact that there is not an identified date for the beginning of irregular maintenance practices also reveals that surveillance tasks that are

supposed to be performed by National Authorities have failed, because apparently the situation has been going on for a long time. Thus, we request Authorities involvement to enclose repairs as part of the corrective action in the final wording of the AD in order to alleviate from airlines the accomplishment costs.

- The compliance time is very restrictive and not consistent with the level of risk adduced under the 'Reason' paragraph. A minimum of one year shall be provided to allocate enough stock of seat belts in case repairs are not published as corrective actions as part of the final AD. Air Europa initial impact assessment reveals that around 7000 seat belts in our fleet might be affected. Hope this information will help to improve the PAD.

Commenter 85 : Deutscher Aero Club, Dr. Meike Müller 21/01/2010 - P. Pollack – 25/01/2010 – Soren Schulz 27/01/2010 - Schillebeeks Bart 03/02/2010 - Vliegclub Haamstede, Mark & Sylvia Verhagen, The Netherlands 03/02/2010

Comment # 85

Equipment & Furnishings - Safety Belts / Torso Restraint Systems - Inspection

PAD 10-010 is strictly rejected by Deutscher Aero Club due to the following reasons: PAD No 10-010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem. The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reason for the PAD are not given.

2) Deutscher Aero Club rejects the PAD as an inappropriate regulation as only formal, administrative arguments are presented for the described regulation. There is no technical reason published within the document.

3) The PAD addresses all safety belt systems maintained or repaired by the mentioned companies. EU-VO 2042/2003 came into force for aircraft under non commercial operation in Germany on the 1. of April 2009. At the earliest, this regulation was applicable on the 28. of September 2003, before that all procedures for any maintenance or repair issue were performed under effective national rule. Therefore, any safety belt system repaired or maintained under those valid regulations before that date has to be exempted from the PAD.

3) The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. The owners of aircraft affected by this PAD are faced by disadvantages without any responsibility in this case.

Comment 1:

The list of the manufacturers mentions the company "Autoflug" but the list for Type Approval holders does not. Is this correct?

Comment 2:

The life span of safety belts used in air sport is between 12 and 15 years. Accordingly the last maintenance or repair can have been up to 15 years ago. EU-VO 1702/2003 and 2042/2003 has been only in place for 6 years, for non commercial operated aircraft since april 2009. Before these dates, all maintenance or repair work was performed under national law. The AD can not be valid for any of those procedures as no European law was in force.

Comment 3:

The following comment is written from the perspective of the air sport community in Germany. The textile component of the safety belts used in

sailplanes or aeroplanes was exchanged at the end of the life span by a maintenance organisation. This was a routinely performed procedure in small air sport aircraft without any observed safety risk. Due to this, it can be assumed that a major part of the aircraft used in air sport is affected by this AD. Even more, as many of these aircraft have a lifespan of several decades.

First estimates give the following numbers of aircraft that will be affected in Germany:

Approximately 80% of the Sailplanes and Touring Motor Glider: 8.000 aircraft

Approximately 90% of aeroplanes up to 2t MTOM: 6000 aircraft

Taking these numbers into account, about 34.000 safety belts have to be exchanged due to this AD. Costs per safety belt of about 300,- Euro would induce a total amount 10.2 Million Euro.

Comment 4:

Latest 6 months after publication of the AD (LTA) all affected safety belts have to be exchanged or the respective seats have to be inactivated. The hint shall be allowed that sailplanes have a maximum of 2 seats but the majority of those aircraft has only one. Therefore the inactivation of the only seat is no option for the owner as it is actually a grounding of the sailplane. Considering that the second seat is mainly needed for the instructor the aforementioned is also true for the two-seater.

It is unrealistic, that the manufacturer of safety belts for sailplanes and small aeroplanes (the safety belts for those aircraft differ from those for large aircraft) are able to produce 34000 new safety belts in a time period of 6 months. Therefore, after 6 months the majority of the fleet used in air sport will be taken out of operation by this AD.

Comment 5:

Maintenance organisations as Gadringer or Schlemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by an approved procedure, accepted by an approved organisation namely the LBA. The by the AD defined unairworthiness of safety belts maintained under the circumstances described is only justified by formal and administrative facts. Due to that the AD is in form and content not proportionate and unacceptable.

Beside that, the AD has to define possibilities to certify retrospectively the maintenance programme to avoid the exchange of all safety belts affected. The Main task of the agency and its related rules is to ensure safety in European aviation under acceptable provisions for the owner of the aircraft used. Therefore, a proposed procedure to fulfil the rules and regulations has also to be written considering the related financial burden.

Comment 6:

The maintenance organisations "Gadringer" and "LTB Schlemann" are certified as Part 145 organisations since 2004. They release their products or maintained parts to service using an EASA "Form One".

Since 2004 both companies were audited at least two times by LBA. LBA itself was audited several times. It has to be assumed, that neither LBA nor EASA performed their duties in an appropriate manner. It has to be investigated, whether LBA and EASA have to compensate the resulting financial damage. In particular it has to be stressed that the company Gadringer-Gurte was audited by EASA and LBA without any finding.

Commenter 86 : p.ressle GmbH + Co. Spedition, Paul F. Ressle – 25/01/2010

Comment # 86

this AD is another perfect proof of the incompetency of the EASA organisation! Think of mode S transponders, fire extinguishers, first aid kits in small or aerobatic airplanes and other nonsens. It is a shame.

Obviously this is an attempt of the listed manufacturers with the help an assistance of EASA to reduce competition and to bring back big amounts of money into their pockets. Companies as Gadringer and Schlemann are working for over 40 years without any safety problems. These companies are audited and supervised on a regular basis from the LBA and also from the EASA without any finding!

So, what do you want EASA? Are you sponsored or corrupted from some manufacturers? Seems so!

I will definitely not change the belts in sport and aerobatic airplanes, because of this stupid, senseless and useless AD.

Hope you will find a way back to reality and stop going on to kill light and general aviation.

Commenter 87 : CAMO 4U GmbH, Kurt F. Wasenitz – 25/01/2010

Comment # 87

hiermit drücke ich meinen Unmut und Widerspruch zur EASA PAD 10-010R1 aus, den es hierbei in keinsten Weise um ein technisches Problem und schon gar nicht um ein safety item!

Vielmehr wird hier ein Formalismus ausgeübt, mit dem sich die EASA vor den „Karren der Hersteller“ (i.d.R. ex USA) spannt. Die Hersteller haben es vermieden die Passage des Austauschs des Gurtbandes mit in die Instandhaltungsunterlagen einzufügen. Die kompletten Unterlagen werden nur an die vom Hersteller „authorised Maintenance Organisations“ weitergegeben.

Die Vorgabe, das die Instandhaltung auf die Approved Data stützen muss, haben wir von der EASA „geerbt“ denn in der JAR 145 gab es noch eine Passage der „gleichwertigen Sicherheit“. So haben die Betriebe quasi mit „grandfather rights“ weitergearbeitet.

Dies ist Formalismus pur ohne technische oder safety relevante Bedeutung. Warum heißt es eigentlich EASA oder wird die Kölner Behörde bald in EAFA umbenannt (mit dem F für Formalismus).“

Hier muss ein anderer Weg gegangen werden: Wenn ein Betreiber eine Produkt einsetzt, oder ein Betrieb die Instandhaltung machen darf muss er auch die notwendigen Unterlagen bekommen können. Und zwar so, das er damit auch realistisch arbeiten kann. Oder man muss ein Verfahren in den Teil 145 einarbeiten, der gleichwertige Sicherheit gewährt z.B. den § 145.A.45 d) erweitern oder entsprechend kommentieren.

Alles andere ist Formalismus und nicht zielführend.

Commenter 88 : Technische Universität Braunschweig, Prof. Dr. Stefan Dübel - 25/01/2010

Comment # 88

in respect of PAD No.: 10-010 on "Equipment & Furnishings – Safety Belts / Torso Restraint Systems - Inspection", we would like to point your attention to the direct contradiction of named PAD to the "Council Conclusions on the Commission communication on an agenda for sustainable future in general and business aviation" from the 2861st TRANSPORT, TELECOMMUNICATIONS AND ENERGY Council meeting Luxembourg, 7 April 2008, in particular Paragraph 4 ("THE COUNCIL RECOGNISES that general and business aviation in Europe comprises mainly privately owned aircraft, small and medium-sized enterprises or not-for-profit organisations having limited resources to keep up with the ongoing regulatory changes...), and the decision by the European Parliament (03-02-2009) which both advise to not enforce measurements which are solely driven by regulatory, but not by safety and technical reasons.

From the available documentation, there seems to be no indication of safety issues with all of the mentioned parts. Further, the affected parts were maintained in accordance with national law.

In this respect, we would propose to reconsider the planned AD to be restricted to Safety Belts / Torso Restraint Systems with evident safety issues. P.S. the email address for feedback given in the PAD document did not work ("Delivery to the following recipients failed").

Commenter 89 : Lufthansa CityLine GmbH , Dirk Schulz – 25/01/2010

Comment # 89

We have read the EASA PAD No: 10-010 with astonishment. As an experienced airline with our own technical organization, we regularly watch the state of our aircraft and their components carefully.

With this EASA PAD we are affected by an AD at the first time which is not based on a technical background. The affected maintenance organisations are all approved by the national authority (LBA) and are in the business since several decades. Technical defects of the restraint systems were not reported by these organisations as well as we are not aware that these belts do have had any problems.

Here some questions with regard to the PAD:

1) The PAD states "that safety belts and torso restraint systems...have been maintained or repaired by maintenance organizations without holding approved maintenance data". We contacted the repair shops and we were told that a manual from the manufacturer is available, but for EASA some procedures would not be adequate or not in place (replacement of webbing). They told us in addition, that the manufacturer is not willing to provide complete approved data to the repair shops (only shops with their authorization can get the complete manual). What is EASA's action to urge the manufacturer to fulfil his obligations ?

2) Does somebody (on behalf of EASA) conduct some tests on the safety belts/torso restraint systems to verify if these parts (maintained/repared "without approved data") really have deficiencies or are unreliable ?

I was told that the repair shops have used a "standard" that is to say 'according to sample' (= the original manufacturer model). I think a verification with some tests is a reasonable way before EASA put the burden (workload and cost) on the operators.

3) Has EASA considered how many safety belts/torso restraint systems shall be replaced?

I cannot believe that the manufacturer is able to deliver such amount of new safety belts/torso restraint systems (in order to replace the affected ones) in the given timeframe defined in the PAD.

4) The conclusion of "Required Action(s) and Compliance, (3)" is: BUY only from the manufacturer / REPAIR belts only at the manufacturer / MAINTAIN the belts only at the manufacturer facilities (or their authorized repair shops). [It sounds like a new business plan from the manufacturer - "with blessings from EASA"]. With the lack of a technical reason and with the disproportion in the PAD demanded measure, it is our firm conviction that this PAD must not be published as an AD in this way.

Commenter 90 : MOTORFLUGUNION KLOSTERNEUBURG, Gustav Z. HOLDOSI – 25/01/2010

Comment # 90

Guten Tag Hr. Dir. Patrick GOUDOU, guten Tag Hr. Dir. BANAL,

Die EASA legt mit PAD 10-010 die GA de facto lahm und treibt damit alle in neue Kosten hinein, ohne dass eine sicherheitsrelevante Notwendigkeit besteht

Die generelle Frage der Technik und verwendbarer Materialien für Sicherheitsgurte ist wohl eine, die längst allgemeingültig geklärt ist und offensichtlich nur mehr bei der EASA als "unbefriedigend" zelebriert wird.

Niemand hat ein Patent auf einen ordinären Sicherheitsgurt und erscheint diese vorgesehene AD als eine diskriminierende Maßnahme gegenüber der europäischen Luftfahrt sowie uns wohlbekannten seriösen Herstellern und deren Abnehmern.

[[PictureWithLink](#)] De facto müssten wir also nach dieser PAD als direkte Auswirkung z.B. bei der Firma GADRINGER als EASA-zugelassener Gurthersteller "neue Gurte" bestellen, die dann keine andere Qualität aufweisen können, als die von ihr "überholten" Gurte, da sowohl da wie dort die gleichen Ausgangs-Materialien/Gurtbänder zur Herstellung verwendet werden können.

Offensichtlich ist dem Verfasser des PAD auch entgangen, dass bei jeder Gurtbandzulieferung an die genannten Gurt-Herstellerbetriebe/Gurtüberholbetriebe ein gültiges Qualitäts-Zertifikat gemäß LFA-Forderungen übergeben wird.

Kein Gurt-Hersteller/Überholer benötigt vordergründig diese sogenannten "Originalunterlagen", da der Wissensstand über den richtigen Bau/Einbau von Sicherheitsgurten heutzutage wohl auch unbestreitbar europäisches Allgemeinwissen ist!

Eine unsachgemäße Wartung kann wohl bei so renommierten und EASA Part 145 zertifizierten Betrieben, wie z.B. Fa. GADRINGER oder SCHLEMMANN, wirklich nicht angenommen werden.

Vielmehr wird der dringende Verdacht genährt, dass wieder einmal von EASA-Bürokraten reines Papier "erschlagen" werden und in Folge die Preise für Gurten auf geschätzt den doppelten Betrag in die Höhe getrieben werden sollen.

Es wird augenscheinlich ein "verwaltungsrechtliches" Problem zelebriert, das völlig unangemessen und überzogen erscheint, wobei nicht einmal sichergestellt ist, ob dies mit europäischen Recht vereinbar ist.

Frage: Ist Lobbying (leider nur in Österreich gesetzlich verboten <siehe StGB § 304>) die Ursache dieser PAD?

Zweifelt die dafür zuständige Abteilung Standardisation gar an einer fachgemäßen Ausführung der betroffenen Gurte?

Dann bitte die Grundlagen hierfür sofort auf den Tisch, dann veranlassen Sie bitte aber auch gleich ein Emergency-AD!

Zehntausende Flugzeuge vom Segelflugzeug bis zur Linienmaschine in Deutschland und Österreich sollen mit dieser AD gegroundet werden!?!

Wir betreiben selbst eine Flotte von elf Flugzeugen und werden durch diesen Bürokratenirrsinn unnötig schwer geschädigt!

Einem Grounding aus nichtigen, nicht technisch bedingten Gründen für unsere Luftfahrzeuge stimmen wir in keinem Fall zu.

[[PictureWithLink](#)] [[PictureWithLink](#)] BEGRÜNDUNG UNSERER ABLEHNUNG:

Schließlich geht es nicht um die Neuschaffung von Bauteilen sondern lediglich um auszutauschendes Gurtmaterial (entsprechend den Mindestforderungen TSO C22 bzw. C 114), welches da wie dort von wenigen weltweit agierenden Ur-Produzenten stammt und die von vorgenannten luftfahrtbehördlich zertifizierten LTB's, durch das LBA und AUSTRO CONTROL mittels genehmigten Reparatur- und Instandhaltungsanweisungen (siehe auch deutsche LFA Lufttüchtigkeitsforderungen für Anschnallgurte) grundüberholt wurden. Die bestehenden Genehmigungen der betroffenen Betriebe haben wir diesem Schreiben beigelegt.

Wir machen ausdrücklich darauf aufmerksam, dass auch in Österreich seitens AUSTRO CONTROL diese Überhol-Verfahren rechtlich einwandfrei qualifiziert und unsere Gurte somit rechtens eingebaut wurden! Daher ist auch durch unsere nationale Luftfahrtbehörde AUSTRO CONTROL mit einer negativen Stellungnahme zu rechnen.

Wir bestehen darauf: Ausgelieferte Gurte, die im Rahmen einer gültigen Genehmigung überholt und LTB's eingerüstet wurden, müssen ihre Lufttüchtigkeit behalten.

ANTRAG:

Wir verwehren uns daher als Käufer und Anwender dieser Produkte vehement durch diese angedachte Maßnahme in unnötige Unkosten getrieben zu werden und beantragen, dass EASA allenfalls vor Inkrafttreten dieser PAD auf eigene Kosten Qualitäts-Auszugs-Tests durchführen lässt und damit die Notwendigkeit dieser Maßnahme als zwingend erforderlich nachweist!

HINWEIS:

- Sollte sich herausstellen, dass wir unnötig aus fadenscheinigen, technisch nicht zu vertretenden Gründen durch Ihre Behörde verursacht Schaden erleiden, habe ich bereits von unserem Vorstand die Ermächtigung gegen die Verantwortlichen der EASA rechtsfreundliche Schritte zu unternehmen.

- Bedenken Sie, dass Sie möglicherweise völlig ungerechtfertigt den Ruf dieser Gurt-Herstellerbetriebe schädigen bzw. europäische Arbeitsplätze gefährden.

- Liegt es daran, dass die Beamten/Verursacher der durch solche Aktionen immer unpopulärer werdenden EASA die Kosten schließlich nicht selbst bezahlen müssen?

Dafür dürfen wir die, wie man in den österreichischen Zeitungen fast täglich lesen kann, beamteten "Privilegienschinder Europas" auch noch fürstlich entlohnen?

Gerade durch solche unüberlegte Aktionen stärken Sie den Europagedanken keinesfalls, sondern schaffen immer mehr Europagegner.

Auf diese EASA-Zwangsbeglückungen können wir gut und gerne verzichten!

EMPFEHLUNG:

- Entfernen Sie jene Mitarbeiter der EASA, welche bewusst solche zuvor genannten Traktate erarbeiten.

- Lassen Sie jedes Schreiben/PAD vorher auf Plausibilität und Auswirkungen auf die europäische GA durch Luftfahrt-Experten überprüfen!

- Tragen Sie Obsorge, wie Sie die Nutzer der General Aviation nicht ungehörig belästigen. Sie blockieren damit und belasten unnötig unsere Lebens(arbeits)zeit.

- Schauen Sie darauf, dass im Gegensatz zum Vorgesagten besser Erleichterungen Platz greifen und Ihre Behörde bürgergerecht arbeitet.

Wir haben in Zeiten der Wirtschaftskrise ohnehin genug zu tun, um zu überleben.

- Gar nicht zweifelsfrei ausschließen können wir den Gedanken, dass "erfolgreiches Lobbying" durch einen missgünstigen Mitbewerber zu dieser Maßnahme führen soll.

Eine interne Untersuchung in diese Richtung wäre zumindest überlegenswert.

- Hören Sie endlich auf die General Aviation dauernd mit neuen Gebühren und Kosten zu belasten und arbeiten Sie so, wie es sich Europas Bürger erwarten dürfen:

Mit Augenmaß und vor allem Augenmerk auf wirtschaftliche Vertretbarkeit!

Arbeiten Sie nicht gegen unsere europäischen Luftfahrtbetriebe, sondern für diese!

Was haben wir in den letzten Jahren nicht schon mit dieser EASA mitgemacht:

Da wurden gleich zu Beginn deren Tätigkeit ohne Augenmaß gar nicht zutreffende Maßstäbe der Großluftfahrt - wider besseres Wissen - in die General Aviation übertragen und musste dann viel davon wieder zurückgenommen werden. Daraus sollte man auch lernen.

Ich ersuche um Ihre geschätzte Antwort sowie Übermittlung um Bekanntgabe der angeordneten Maßnahmen innerhalb der nächsten 14 Tage.

Commenter 91 : Lufthansa CityLine GmbH, Kurt-F. Wasenitz – 25/01/2010

Comment # 91

We have read the EASA PAD No: 10-010 with astonishment. As an experienced airline with our own technical organization, we regularly watch the state of our aircraft and their components carefully. We also watch the developments of our authorities (EASA and LBA) continuously. With this EASA PAD we are affected by an AD at the first time which is not based on a technical background. The EASA does not agree how the maintenance organisations fulfil the requirements to 145.A.45. The CMM which is in use is not complete. The exchange of webbing is missing in the CMM. The affected maintenance organisations are all approved by the national authority (LBA) and are in the business since several decades. Technical defects of the restraint systems were not reported by these organisations as well as we are not aware that these belts do have had any problems. So this is definitive in no way a safety issue (For what stands the "S" in EASA?).

With the lack of a technical reason and with the disproportion in the PAD demanded measure, it is our firm conviction that this PAD must not be published as an AD in this way. As well as it would have a negative affect on EASA's reputation if the formalism becomes the driver to issue an AD. It is our opinion that manufacturer have to provide the manuals to the organisations. It can not be accepted by all organisations involved that the manufacturers do not distribute the CMM needed. Only organisations authorised by the manufacturer himself have the full CMM. This is the point at which the system is faulty. It is our opinion the EASA should prevent this in reference to the Part 21.A61.

Commenter 92 : Giorgio Ballarati – 25/01/2010

Comment # 92

as professional in the gliding community, dealing mainly with second-hand gliders sale and maintenance, I would like to share with you some comment on the AD proposal in subject.

All owners, users or maintenace organization in the sport aviation followed the national rules for almost 40 years, those rules were a bit different from country to country but where in anycase referring to a common certification system that worked quite well for a long period.

EASA was born few years ago, with the main intent of making rules equal to all countries and to all owner, users, etc....

If in any of the aspect connected to airports activity, there were some administrative or procedural problems, these problems must be solved between organization, not directly affecting the users and owners community. It's not accetable, that a glider owner, who sent for overhaul his seat belts 2 or 3 years ago, following the rules in validity at that time, has to do the job again, assuming the cost of the operation as well.

The number of airport aircraft, gliders, motorgliders in Europe is so huge (i think more than 50.000) that the decision of re-making the overhaul process of seat belts (even if only 30% of aircrafts are affected) would immediately bring to a total collapse of manufacturers and overhaul organization, that are not in condition of overhauling thousands and thousands seat belts in a short period of time. There is even no possibility this manufacturers would adapt their capability to this request that would only last for a short period of time and only once. Not having the possibility to comply with a new rule, from the user/owner point of view, would bring in a complete failure of the safety system. At least this AD would only bring to thousands grounded aircrafts. In addition owners/users that keep safety in first position, will suffer of having their glider/motorglider/aircraft grounded for months or maybe years waiting to have their perfectly overhauled seat-belts overhauled again, this could generate a strange market counter-effect like increase of prices, etc... In a world market that is already suffering a big crisis, this is the last thing we want.

Commenter 93 : InterSky Luftfahrt GmbH, Gunnar Burkhardt – 25/01/2010**Comment # 93**

Regarding EASA PAD 10-010 Equipment& Furnishing- Safety belts / Torso Restraint Systems-Inspection

Request: Extension of Compliance Time and review reason of AD issuing.

If these suspect safety belts meet all safety requirements such as tensile test, flammability and so on, we would like to recommend extension of the Action and Compliance Time to a common value. Due to the fact that a huge amount of seatbelts are affected within Europe, and that all of them had to be replaced/ manufactured, the compliance time given in the PAD 10-010 is not economical realizable. Our recommendation would be 6000 Flight hours or three years after effective Date. We also recommend to prove if the discrepancy of the approved maintenance data from the manufacture and the data used, is really affecting safety to an AD level and also if it is enough to declare all affected belts unserviceable. If you need more information from our side please feel free to contact us.

Commenter 94 : Dr. Ulrich Werner– 25/01/2010**Comment # 94**

I am the CEO of the aeroclub and airport of Bad Neuenahr, Germany. I am operating a fleet of 8 a/c with 16 seats. Professionally I am an active duty airforce officer with training and experience in a/c accident investigation.

For 52 years our fleet is maintained by legal means in Germany. Now, suddenly, work which have been done within the last 12 years should be rendered faulty by definition. This is ridiculous.

My paramount concern about operating the a/c is aviation safety. The seat belts were maintained legally, there is no history of malfunction within decades. If you proceed with the proposed AD money will be wasted with no net gain to aviation safety. To take such drastic action, with no evidence of safety concerns in the past, will undermine the credibility of EASA.

If there are formal matters you consider necessary in the context of restraint systems in the future, allow the work which has been done within the last 12 years and the belts in use as method of alternate compliance.

I strongly recommend not to field the proposed AD because it does not support aviation safety but violates confidence in controlling administrations!

Commenter 95 : Hermann Wilken – 25/01/2010**Comment # 95**

Sehr geehrte Damen, sehr geehrte Herren, mit Entsetzen habe ich als Besitzer eines Segelflugzeuges die PAD No. 10-010 zur Kenntnis genommen. Als verantwortlicher Pilot stehe ich vorbehaltlos hinter jeder sinnvollen sicherheits-fördernder Anweisung, denn ich hänge an meinem Leben. Jedoch halte ich diese Anweisung aus folgenden Gründen für unangebracht:

1.) Technisch in keiner Weise zielführend, weil im Gegensatz zum Kfz in einem Flugzeug, bedingt durch die fehlende Strukturfestigkeit des Rumpfvorderteils bei weitem nicht so hohe, überlebensrelevante Gurtkräfte auftreten können. Daher ist eine so strikte Vorschrift zum Austausch bzw. Überprüfung sinnlos. Im Kfz gibt es keine Laufzeitbegrenzung, sondern nur ein Austausch on-condition, z.B. wenn bei der

Hauptuntersuchung (TÜV) ein Defekt festgestellt wird. Daher halte ich auch die gegenwärtige Vorschrift, die Gurte nach 12 Jahren auszuwechseln, für total überzogen und schlage einen Tausch der Gurte on-Condition vor, der Zustand der Gurte wird ohnehin bei jeder Jahresnachprüfung festgestellt.

2.) Diese Proposed Airworthiness Directive empfinde ich als einen Akt bürokratischer Willkür. Es sind nur einige Betriebe und nur deutsche Instandhaltungs-Betriebe betroffen. Ich wünsche mir auch hier eine europaweite Vereinheitlichung. Warum bestraft man mich, nur weil ich Deutscher bin und meine Gurte in einem deutschen anerkannten LBA-zertifizierten Betrieb habe überprüfen lassen?

3.) Die Auswirkung dieser unsinnigen Anweisung entbehrt jeglicher Verhältnismäßigkeit. Es sind zig-tausende Flugzeuge betroffen. Ein Sicherheitsgewinn ist nicht gegeben, Fälle von Versagen der Gurte in überlebensfähigen Unfällen sind nicht bekannt.

4.) Die zunehmend überbordende EU-Bürokratie, die außer extrem gestiegener Kosten für mich keinen sichtbaren Sicherheitsgewinn zeigen, wird viele Piloten/Eignern in die Illegalität treiben. Es wird immer Mittel und Wege geben, in diesem Fall, wie auch in anderen schon beschlossenen Vorschriften, diese zu umgehen und das halte ich dann für ein wirkliches Sicherheitsrisiko.

Commenter 96 : Wilfried Dobé – 25/01/2010

Comment # 96

please help keeping airports affordable by avoiding ADs like this without serious technical matters! Sporting is a vital part of our culture, support of european society and outpost of international understanding! I strictly reject PAD 10-010!

PAD No 10-010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem. The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reason for the PAD are not given.

I reject the PAD as an inappropriate regulation as only formal, administrative arguments are presented for the described regulation. There is no technical reason published within the document.

The PAD addresses all safety belt systems maintained or repaired by the mentioned companies. EU-VO 2042/2003 came into force for aircraft under non commercial operation in Germany on the 1. of April 2009. At the earliest, this regulation was applicable on the 28. of September 2003, before that all procedures for any maintenance or repair issue were performed under effective national rule. Therefore, any safety belt system repaired or maintained under those valid regulations before that date has to be exempted from the PAD.

The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. The owners of aircraft affected by this PAD are faced by disadvantages without any responsibility in this case.

Commenter 97 : Wolfgang Siegel– 25/01/2010

Comment # 97

After an intensive discussion in my aero-club last weekend (German-American Glider-Club ,Traben-Trarbach,GE), I herewith submit an objection

to the above mentioned AD. The intention of this AD does not provide any additional safety for glider or motor-glider pilots, operating as non-commercial hobby- pilots (GA). Once in effect, this AD will not only ground all our nine club-owned aircraft, equipped with Gadringer-Safety-Belts, but will jeopardize future flight training as well. My club will not be able to buy 15 new sets of safety belts at a time without having a financial problem (ELT had just to be ordered). Thus, we will have to reduce flight operations at times, we were happy to train 8 new young members aged 14 and 4 adults. I have been an active FI since 1965 and I was the representative of our maintenance shop for many years. At no time can I remember any complaints concerning Gadringer-Safety-Belts and there has never been any incident relating to unsafe belts overhauled or produced by Gadringer. I am – and not only myself – of the opinion, that the a.m. AD, once realized, will

- severely affect flight operations in my aero club over a longer period,
- jeopardize jobs at the Gadringer-Manufactory
- obviously favor US-Belt Manufacturers (See Remarks, para 3. of AD)

How can EASA spread such intentiones as “European-Thinking”? Please stop this AD !

Commenter 98 : Thomas Gerlach – 25/01/2010

Comment # 98

In weighing risk of incidents with overhauled belts and restraint systems of well known companies like Gadringer against the impact of the proposed PAD to hundreds and thousands of gliders and aircrafts I do not see the PAD as reasonable. Gadringer for example has a long tradition which was approved by LBA in the past and never resulted in issues. To now require to replace such parts seems unreasonable to me. Also most likely there would not be enough capacity to overhaul the systems (once again) in such a short time, resulting in a lock down of lots and lots of planes for a potential mitigation of a nearly not existing risk. For that reason I ask to not set the PAD valid or give the reaction time a reasonable range (like within next 2 years or so...)

Commenter 99 : Holger Zicker– 25/01/2010

Comment # 99

mit dieser AD bestätigen Sie meine Vermutung die Industrie direkt zu subventionieren. Wie viel Schmiergeld muss man anlegen um so einen Blödsinn verbreiten zu lassen?

Commenter 100 : Timm Holzhauer – 26/01/2010

Comment # 100

as Private Pilot since 1985 and owner of private Aircraft since 1988, I am shocked about a.m. AD. Does it make any sense??? I see these kind of overkill-regulation-madnss more and more! Its more Paperwork than ever, more obscure regulations, etc. How can it be, that something that

worked for quite some time, all of a sudden not good enough any more??? It does not make any sense that a german can have his seat belts overhauled in Austria legally, but has to replace a newly overhauled seatbelt overhauled by one of the german companues?? Is it safer not to do any overhaul? I fly in the US a lot Why is it that only german companies are on this list??? It really seems like there is something giong on between the german LBA and EASA... I hope, I really do, that this will be solved quickly!! I am sorry, but enough is enough!

Commenter 101 : Austrian Airlines AG, Kirsti Ruckelshausen – 26/01/2010

Comment # 101

it is unbelievable the preferableness<UrlBlockedError.aspx>. The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years. i dont know which selection method you used - but it seems that there is more unequable commercial interrest than really the security mind responsible. so pls also consider german manufacturer - Gadringer for example, makes a really proffesional job on overhaul - i used it for my aircraft already. So don`t change working system under simulation of security reason - there is for shure NO FACUTAL REASON!!

Commenter 102 : M. Schönbucher – 26/01/2010

Comment # 102

I do not understand why the whole safety belt should be replaced. In my opinion replacing the strap should be enough when the buckle mechanism is still in good shape. The proposed inspection of the safety belts of every aircraft makes sense only when it is performed within the annual aircraft inspection.

Commenter 103 : Ulrich Werner – 26/01/2010

Comment # 103

I would be one of possibly thousands affected aircraft owners, privately operating a glider in Germany, if the proposed AD becomes effective. Under national authority the maintenance of belts was executed for some 50 years with technically sound and obviously proven methods. Proven by the worst of all possibilities, actual accidents. Never there was an accident investigation which found malfunctioned belts after such a maintenance, in Germany or abroad. Moreover, belts in Germany became replaced after a defined time span. The equipment of my glider was maintained legally and there is no indication of a technical malfunction, not to speak about a safety issue at all. Up to now I thought EASA is promoting aviation safety. Your proposal has nothing in common with safety matters, but rather is promoting a business war or a fight of administrations. I object the AD and ask to withdraw the proposal.

Commenter 104 : Dr Harald Dreher – 26/01/2010**Comment # 104**

Ihr Bemühen um die Sicherheit im Luftverkehr erkenne ich absolut an und viele Maßnahmen sind sicherlich wichtig. Aber im Rahmen der vorgeschlagenen AD 10-010 würde ich Sie bitten, dies nochmals zu prüfen. Weshalb: N-registrierte Flugzeuge haben - ohne dass irgendeine Stelle aufgrund mangelnder Gurte zusätzliche oder vermeidbare Verletzungen bei Passagieren feststellen konnte die Lösung- "own conditions" das ist Ihnen sicher bekannt. Der statische Termin der 12 jährigen Auswechslung ist schon ein Item der zur Überprüfung gestellt werden sollte. Ist er wirklich sinnvoll? Kann durch Zahlen dieses Vorgehen belegt werden? Bitte prüfen Sie nochmals Ihren Vorschlag auch unter Berücksichtigung vieler Kommentare unter der Seite: www.pilotundflugzeug.de

Commenter 105 : Franz Joachim Sahn – 26/01/2010**Comment # 105**

hinsichtlich der Instandhaltung von Gurtsystemen muss ich als betroffener Bürger Sie dringend bitten, offensichtliche Kompetenzstreitigkeiten mit dem deutschen Luftfahrtbundesamt nicht auf dem Rücken von Flugzeughaltern auszutragen, die sich einwandfrei verhalten haben. Könnte ich nicht aufgrund einiger Erfahrung im Umgang mit großen und rivalisierenden Organisationen erkennen, was an allzu menschlichem hinter der o.g. PAD steckt, würde ich mir um den Geisteszustand der Verantwortlichen große Sorgen machen

Commenter 106 : Torsten Beyer – 26/01/2010**Comment # 106**

get real. In case of Gadringer, they had no chance to get the "Original Maintenance Data" for some of the belts they were maintaining. The original manufacturers had gone bust. As a consequence Gadringer's maintenance procedures for affected belts were agreed in a special agreement with the LBA. Why change this? What additional safety are you guys expecting to create here? None, I would say. You are just creating more hassle, extra cost and ZERO incremental benefit to anyone (other than manufacturers of new belts). Please take this back - this PAD is absolutely useless. Please focus on areas that are creating more safety, less hassle and less regulation.

Commenter 107 : Officine Aeronautiche Ghidotti srl., Michele Da Ros – 26/01/2010**Comment # 107**

these are approved facilities for the overhaul of seat belts. All our customers' gliders equip those kinds of seat belts, so there is an incredible economic impact on general aviation. We have several EASA form 1 of these belts, and we are unable to understand which ones are acceptable: there isn't a starting date too.

Commenter 108 : Flugzeugservice W. Ader LTB., Willy Ader – 26/01/2010

Comment # 108

I was surprised and astonished to read the proposal NOTIFICATION OF A PROPOSAL TO ISSUE AN AIRWORTHINESS DIRECTIVE PAD No. 10-010
I disagree to this proposal.

1. there are only 5 manufacturers of seat belts mentioned in this proposal
2. this proposal does not concern the belts of approx. 35 – 40 other manufacturers worldwide
3. this is a discrimination and a distortion of competition
4. The belts manufactured by LTB Schemann and others are manufactured under certain Quality Standards. These have been – as far as I know - approved by the German LBA in the past. There have been verification/ proves done that the belts and the sewed parts are able to carry a load of 2000 – 3000 kg. That means They are able to carry a gravity of 20 – 30 g in case of an accident. (1 passenger calculated with 100 kg)
5. If this AD will come into force... then nearly no German Airline will fly any more. (I saw a lot of Belts in big fleet operators which have been manufactured by German Companies, mentioned in your proposal)
6. This will mean the same for General Aviation.

As we are working with LTB Schleemann as subcontractor for more than 10 years. I CAN NOT UNDERSTAND such a proposal at all. For me this means all testings done in the past are no longer valid any more. All safety belts manufactured in the past have never been safe. If the EASA will issue such an AD as proposed ... for me this means that the manufacturers as mentioned in the proposal do not have an AUTHORIZATION, even they have an AUTHORIZATION-No. as e.g. LTB Schleemann (DE145.0188). For this reason I ask you to inform me about:

When or where has a seat belt failed in the past, manufactured by the manufacturers mentioned in the proposal. Please mention one accident in the past where a safety belt manufactured by the companies stated in the proposal failed in the past. Do the manufacturers in the proposal still have a valid Authorization by the LBA and the EASA? Or is this Authorization invalid already? Are the JAA-Form-One forwarded with the manufacturer's products in the past still valid or not? Please explain how the manufacturers mentioned in the proposal have been able to receive an authorization even with a not having an approved procedure, as mentioned in the proposed AD. Looking forward to your answer and thanking you in advance.

Commenter 109 : Aegean Airlines, Nigel Bullimore – 26/01/2010

Comment # 109

We would like to inform you of our concerns regarding the intent of the attached PAD No.: 10-010; as an airline we utilise the services of approved Part 145 organisations that have been authorised by their national airworthiness authority to carry out repairs to specific aircraft parts detailed within the organisations scope of approval (capability list). The PAD has identified four maintenance organisations who do not conform to EC Regulation 145.A.45 with proposed 'Required Action(s)' that would require Aegean Airlines to identify and replace parts maintained or repaired by these organisations.

Aegean Airlines currently use ACM Aircraft Cabin Maintenance GmbH to carry out maintenance and repairs on aircraft parts and we raise the following issues with PAD No.: 10-010:

1. How has ACM Aircraft Cabin Maintenance GmbH's capability list (attached) been approved by the Luftfahrt-Bundesamt (LBA) if they do not comply with 145.A.45?
2. Where in EC Regulation 145.A.45 does it state that '(E)TSO approved parts and appliances can be maintained and repaired only if approved maintenance data provided by the (E)TSO approval holder are used'?
3. Apart from issuing this PAD what will EASA do if an (E)TSO will not provide approved maintenance data to these maintenance organisations?
4. Have the logistical and financial implications of this PAD been identified with regard to liability for compensation – these parts have be maintained by a Part 145 organisation approved by the LBA.

Due to the proposed implications of PAD No.: 10-010 we have currently suspended all maintenance work with ACM Aircraft Cabin Maintenance GmbH and quarantined all stock related to this organisation; we therefore would request a swift response to our concerns regarding this PAD. Thank you.

Commenter 110 : Abteilung Flugbetrieb und Flugtechnik / AOT, Schwingshackl Josef – 26/01/2010

Comment # 110

Austro Control sees no safety impact if the maintenance is done according minor change on A/C level and the working method acc. AC 43-13-1A. This maintenance can be done acc. Part M only in approved organisations. Pending the AMC material acc. AC 43-13-1A this document is considered valid until EASA has provided an AMC material with equivalent content and is a part of the pre EASA minor change approval.

Maintenance procedures in the Part 145 and Part M organisations are approved airworthiness data and grandfathered as long as no other decision is made European wide. See ED Decision 2009/011/R GM to 21.A.611). In addition a problem of available maintenance documentation/data for older aircraft exists. The manuals are not revised since decades and CMM.s are not available. In this case maintenance data for safety belts is not available and the restraint systems will remain unsafe with very old belt bands. The maintenance data of these airplanes are structured in a different way. Aging of lap belt material due to oxygen and UV are not considered. Therefore still National Airworthiness Limitations for lapbelts are still existing in various countries to ensure flight safety. Austro Control e.g. has LTA 42 in place for a maximum Operation life of 20 years for textile materials, such as lap belts. This is the same situation as for other TSO products such as elastic tubes or inspection interval for instruments. A EU wide policy is missing. CMM,s are not available for most of the restraint Systems in general aviation.

The rulemaking approach to apply for approval on modification and repairs on ETSO articles was a wise intention, but the outcome was not satisfactory , now we see the effect at the moment on this actual case. Finally, the ETSO is not compulsory or mandatory. The airplane manufacturer still can deviate and this happens. Any intended action is therefore only valid by an TC Holder action. Change of seat covers on seats (ETSO) may be seen in the same context as the above mentioned problem. The economic impact is high on this subject and EASA has been approached several times on this subject. Draft AD (PAD No.: 10-010) We recommend not to issue this AD unless an unsafe condition exists. According 21A.3B an unsafe condition must exist. We expect that more than 50 000 A/C may be affected.

Commenter 111 : Ralf G. Bucker – 26/01/2010

Comment # 111

herewith protest seriously against the proposed above mentioned AD. That will affect my property in a manner, I will not accept, and in case call the courts.

Commenter 112 : Dr. Thomas Knapp – 26/01/2010**Comment # 112**

mit Befremden habe ich von Ihrer o.g. geplanten AD erfahren. Dieses geht an der Realität vollkommen vorbei. Die von den genannten Firmen überholten Gurte weisen keinerlei tatsächliche Mängel auf, die die geplante AD rechtfertigen. Nicht ein einziger diesbezüglicher Vorfall kann von der Behörde genannt werden. Das Überholungsverfahren ist darüber hinaus von der nationalen Behörde genehmigt. Ferner weist auch das Überholungsverfahren selbst keinerlei tatsächliche Mängel auf, welche die Sicherheit im Betrieb des mit einem überholten Gurt ausgerüsteten Luftfahrzeugs gefährden. Schließlich gibt es auch keine rechtliche Grundlage, welche den Erlass der AD in der geplanten Form zwingend erforderlich macht. Die geplante AD ist daher abzulehnen. Es wird um Stellungnahme gebeten.

Commenter 113 : Helimission, Adrian Romang – 26/01/2010**Comment # 113**

I have received your PAD 10-010 concerning seat belts and do have the following concerns / questions / comments:

- 1.) Why are only the seat belts of five original manufacturer's concerned? I'm sure there must be more than five worldwide?
- 2.) Further, it is my understanding that the four repair stations / companies effected are all german companies, see "Required Action(s) and Compliance Time(s)" in the mentioned PAD? Is this correct and if yes, why is that?
- 3.) Are there no other companies overhauling seat belts within all the other European / EASA countries? If there are any other companies working under EASA rules in France, UK, Spain, Italy, Holland, etc etc, why are they not affected by this PAD?
- 4.) I assume that all four german companies are audited on a regular bases by the LBA, which in term is also being audited by the EASA itself? I know that at least one of the four companies has been audited during the last 3 month without any objection or consequences.
- 5.) Therefore, I assume that the four german companies have the appropriate EASA approvals, issued by the LBA? As I understand the four companies, most are in the seat belt business since a long time and prior to EASA regulations, have worked under the national LBA authorisation?
- 6.) Has there ever been a technical incident or failure of any seat belts repaired by any of the four companies? Having said this, I miss in your PAD any reference to any technical reason / concern why such an AD should be issued? Please specify.
- 7.) Did any of the four companies do things wrong in the past or has any ever lost the LBA approval?
- 8.) Are you saying that in certain cases, seat belts being longer in service than the EASA rules exist, should be replaced?

One last thing. We have recently replaced almost all our seat belts in our fleet with overhauled and EASA Form 1 released seat belts. They have been overhauled by one of the affected german companies. Should these EASA Form 1 turn out to be useless despite the work being performed under EASA regulations and approval, then I must assume that somebody in the LBA and/or EASA did not do his/her homework properly? I'm convinced the four companies do work within the scope of their approval only! Why? Because if they don't they wouldn't survive for long with all the audits being conducted these days. Very simple.

I don't have any personal interest in any of the companies, nor any benefit. But what I and many others will have, if your PAD 10-010 will actually become an AD, is extra cost and probably a grounded fleet (imagine all the new seat belts needed over the next couple of month?). And this without any improvement safety wise as far as one can tell today! Thank you for taking this into consideration and I look forward to receive a detailed explanation to the questions above.

Commenter 114 : Reinhold P. Schaak – 26/01/2010**Comment # 114**

soeben erhalten wir als flugzeughalter einer cessna t 210 n ihre proposed ad 10-010 vom 13. januar 2010. hier wird angekündigt, dass alle 6 von der fa. schlemann überholten sitzgurte für luftuntüchtig erklärt werden. sie sind – nach ihrer vorstellung - entweder auszubauen und/oder die entsprechenden sitze stillzulegen (?). nehmen sie bitte zur kenntnis, dass es für dieses modell (1981) – auch vom amerikanischen hersteller k e i n e alternative gibt. wir bitten sie daher dringend um einen praktikable handlungsanweisung und/oder vorschlag. wir nutzen unseren flieger auch geschäftlich für flüge innerhalb europas und können wegen einer angeblich neuerdings fehlenden (europäischen) zulassung für die sitzgurte, die im übrigen seit jahrzehnten von der fa. schlemann einwandfrei instandgehalten wurden, nicht einfach von heute auf morgen auf unser flugzeug verzichten.

Commenter 115 : AIRBUS Central Entity, Elise CASSEN – 26/01/2010**Comment # 115**

The attached PAD 10-010 has been issued on EASA Web-Site for consultation period. This PAD deals with safety belts, torso restraints system. To comment this AD, as this concerns WB A/C, we would like to have some more information on the background of it and how the inspection will be handled at operators level. Indeed this PAD asks for an inspection of the markings of the seat belts to determine where they have been maintained. We are currently reviewing on our side if this is feasible to know where have been done the maintenance only trough regarding the marking on it, did you have the information that this is feasible? Could you please also let us know if the organisations mentionned have performed a bad maintenance and which type of bad maintenance have been performed, or if this AD is due to their non-compliance to the regulations? Thank you in advance for the information provided.

Commenter 116 : Urte Fürst – 26/01/2010**Comment # 116**

as a private owner of a german registered motor glider I strictly reject PAD 10-010 due to the following reasons:
 PAD 10-010 is not grounded on any technical reasons (i.e. malfunction of any of the mentioned safety belt systems or any security threat to the General Aviation rising from the mentioned safety belt systems). PAD 10-010 merely adressess formal and administrative mistakes which have no influence on the quality of overhauled parts from the adressed manu- facturers. Furthermore how can those manufacturers be certified as EASA Part 145 organisations for more than 5 years when they do not work as set forth by the EASA? I expect a qualified and detailedled response from you regarding my concerns.

Commenter 117 : LTB Schlemann GmbH, Dieter Schlemann – 26/01/2010

Comment # 117

nachfolgen Adressen von mir bekannten Firmen die ein overhauled, repair, oder replaced machen. es sind die folgenden Firmen:

1. Lite Flite in Dnemark (haben bis ca.vor 2 Jahren Gurte berholt). Die Genehmigung wurde widerrufen.
2. Jet Aviation in Basel (haben bis jetzt Gurte berholt)
3. AAC-Austrian Aircraft Corporation in Graz (haben bis jetzt Gurte berholt)
- 4.Fa. Paustian Artex GmbH, Bahnhofstr.42, D-24966 Soerup mit dem Betrieb in Heidekoppel 27, D-24558 Hensted-lzburg (haben bisher auch Gurte berholt)
5. Fa. FOLA Airsafe in Schweden (haben bis jetzt Gurte berholt)
6. Fa. Belgraver aircraft interiors in den Niederlanden, EASA Genehmigung nach EASA Part 145 und bietet den re-webbing of seat belts fr Flugzeuganschnallgurte an

Die Fa. ist im Internet unter www.belgraver.nl schnell zu finden. Die Firma hat die EASA-Genehmigung nach Part 145, NL.145.1178

Des Weiteren ist die Fa .Air India offensichtlich auch im Besitz einer EASA Genehmigung nach EASA Part 145 und bietet den REWEB fr Flugzeuganschnallgurte an (s. Anlage). Die Fa. ist im Internet unter EASA REWEB schnell zu finden.

Fa. Southern Safety Inc.(heute AmSafe Aviation) 100 Hudson Industrial Drive, Griffin, GA 30224-4536, ist auch im Besitz einer EASA Genehmigung nach EASA Part 145 und bieten das REWEB fr Flugzeuganschnallgurte an. Sie arbeiten auch nach Muster. Regelmig tauchen bei uns berholte Gurte dieser Firmen auf. Es gibt in den USA mehrere Firmen mit ESA-Genehmigung die Flugzeuganschnallgurte berholen (reweb / replace). z.B.

Repairstation YB1R632K (Aircraft Belts Inc.1176 Telecom Drive, Creedmoor, NC 27522), Repaired per Specification ABIRPS1,Rev.IR. d.h. nach Muster.

als Inst.-Betriebe fallen mir spontan ein:

- Fa. SPEKON, Seifhennersdorf (D)
- Fa. RDER, (D) (schon lnger keine Inst. mehr)
- Fa. HUGEN MAINTENANCE FOR AIRCRAFT, Zevenaar (NL)

(- Fa. SKYCON, Frankfurt (D) - Insolvent)

- lt. Kunden-Auskunft gibt (oder gab es) auch in England u. Italien Gurt-Inst.-Betriebe

Commenter 118 : Erich Kohlenberger – 26/01/2010**Comment # 118**

You write on your homepage: "Our vision is to see European citizens benefit from the safest and most environment-friendly civil aviation system in the world."

But if you really believe in this statement, why do you produce such AD's ? Where are the winnings in safety or in environment-friendliness ?

When we ignore operations and regulations that did not cause any troubles in the past 25 years ? And throw good and almost new parts on garbage ?

Besides: The German LBA has admitted these overhauls in the past. It is incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. And these companies have permit for maintenance according to EASA-Part-145.

Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time. Or - is this an attempt to disparage the competitors and bring some money into the pockets of producers of seat belts ??

Please think about this AD ! And remember, your job is working for pilots and passengers - not for companies and lobbies!

Commenter 119 : Frank Thies – 26/01/2010

Comment # 119

we heard about the planned PAD regarding several Maintenance-Companies as Schlemann, Gadringer a.s.o. and we are deeply impressed by the senselessness of this proposal. We definitely follow word by word the comment of the DAeC.

It is incredible, how far the EASA-proposal is from reality. If there would have been any technical or safety-reason, or a failure in the past, it would be easy to understand. But we are talking about companies, that are doing a perfect job since decades!

Please – forget this idea and put it where it belongs to....

If there are some reasons in bureaucracy that the companies have to modify their paperworks, invest Your time in helping them for the future. May be You would have to invest some hours working . The way You started now is to waste the time of hundreds of engaged pilots, organisations and of course employees of the EASA. Fix Your view on things that are relevant for safety, for deregulation, helping, that airports stay affordable and easy accessible. If You proceed this way, You'll prepare the grave for General Aviation – and with the last GA-Aircraft, Your jobs will be obsolete as well.

Commenter 120 : Axel Schulz – 26/01/2010**Comment # 120**

als betroffener Halter eines Flugzeuges, möchte ich Ihnen mein Unverständnis gegenüber Ihrem "Proposed Airworthiness Directive, PAD No. 10-010" aussprechen.

Ihr Vorgehen ist inakzeptabel und widerspricht in jeder Form den allgemeinen Rechtsstaatlichen Prinzipien.

Ihre PAD ist weder sicherheitsrelevant noch technisch nachvollziehbar. Sie ist ungerecht und unverständlich.

Die EASA widerspricht hiermit in jeder Form einer Vereinfachung zu treffender Regularien.

Ich bin empört, über das Vorgehen einer Europäischen Organisation, welche die Interessen der Bürger Europas wahr nehmen muss.

Alle oben aufgeführten Erläuterungen entstammen meiner persönlichen Meinung und Auffassung eines vereinigten Europas, welches seine Mitbürgern nicht mit immer noch mehr Bürokratie und unverständlichen Handlungen das Leben schwer macht. Das führt zu immer noch mehr sozialem Unfrieden.

Commenter 121 : Dipl. Ing. Burkhard Veldten – 26/01/2010**Comment # 121**

I please you to recall the PAD 10-010 due to following reasons:

- the PAD is not based on technical facts in regard to materials, technical processes or any air traffic incidents
 - it is not the task of the EASA to limit or to regulate the competition of several maintenance companys in such a radical way regarding the process of communication and timeline of this PAD
 - the (relative young) Agency EASA could loose it's credibility among a big number of air traffic participants if the EASA do not base their decisions on strong (technical) facts
 - the (relative young) Agency EASA could loose it's credibility among all the other authorities who are responsible for free trading and competition --> in nearly all other (european) business areas, it is the task of the manufacturer to publish technical documents/processes to enable legal and approvable maintenance for their products. Did the listed manufactures have published any maintenance documents? Did the listed maintenance companys had done the repair not according of such a document?
- I think it is also in the interest of the EASA to let this PAD not come into effect.

Commenter 122 : Rainer Breitenstein – 26/01/2010**Comment # 122**

Ich protestiere! Die bei der EASA geplante luftfahrttechnische Anweisung (Proposed Airworthiness Directive, PAD No. 10-010) vom 13. Januar zu Sicherheitsgurten hat in der Allgemeinen Luftfahrt wie der Verkehrsluftfahrt einen Sturm der Entrüstung ausgelöst, dem ich mich anschließe. Statt alle Verantwortung bei den Flugzeughaltern abzuladen, wäre es vornehmste Pflicht der EASA, bei den Herstellern auf eine Einhaltung der gesetzlichen Vorgaben zu drängen. Die „approved maintenance data“ müssen die Hersteller nach europäischer Gesetzeslage (Part 21) den Eigentümern und Nutzern zur Verfügung stellen, damit diese die Produkte lufttüchtig erhalten und reparieren können! Statt aber die Hersteller zur Einhaltung der gesetzlichen Vorschriften zu bringen und damit zur Herausgabe der Unterlagen, wählt die Behörde den völlig inakzeptablen Weg, ignoriert die Rechtslage und schiebt alle Verantwortung den Flugzeughaltern zu! Das ist ein Skandal !

Commenter 123 : MT AEROSPACE AG, Michael Okulla – 27/01/2010**Comment # 123**

Ich halte es für maßlos übertrieben und ungerecht, unverhältnismäßig, unangemessen eine solche AD einzuführen. Bei keinem der Hersteller von Luftfahrzeuggurten, sind Unfälle/Störungen bekannt, auch nicht bei deren Instandhaltungen. Ich bitte Sie inständig sich die Konsequenzen und Folgen dieser unsinnigen und überflüssigen AD zu überlegen. Dies dient nicht zur Steigerung der Sicherheit in der Luftfahrt, sondern nur zur immensen Steigerung der Kosten, für alle Beteiligten, vor allem für die Kunden der Hersteller wie auch für die jeweiligen Hersteller selbst.

Commenter 124 : – Stefan Kremer - 27/01/2010**Comment # 124**

we heard about the planned PAD regarding several Maintenance-Companies as Schlemann, Gadringer a.s.o. and we are deeply impressed by the senselessness of this proposal. We definitely follow word by word the comment of the DAeC.

It is incredible, how far the EASA-proposal is from reality. If there would have been any technical or safety-reason, or a failure in the past, it would be easy to understand. But we are talking about companies, that are doing a perfect job since decades!

Please – forget this idea and put it where it belongs to....

If there are some reasons in bureaucracy that the companies have to modify their paperworks, invest Your time in helping them for the future. May be You would have to invest some hours working . The way You started now is to waste the time of hundreds of engaged pilots, organisations and of course employees of the EASA. Fix Your view on things that are relevant for safety, for deregulation, helping, that airports stay affordable and easy accessible. If You proceed this way, You'll prepare the grave for General Aviation – and with the last GA-Aircraft, Your jobs will be obsolete as well.

Best regards – and best wishes for new thinking PRO AIRSPORTS and PRO GENERAL AVIATION

Commenter 125 : Armin Müller – 27/01/2010**Comment # 125**

referring to PAD 10-010 I strongly recommend to refrain from activating the same.

Reason:

1. There are absolutely no technical proves about an improvement of the safety situation by activating PAD 10-010. According to my knowledge there`s not a single failure of belts, overhauled by Schlemann, ACM, Gadringer or R+S.
2. Aparently the reason for PAD 10-010 is only a adminastrative struggle for competence, which doesn`t improve the further trust into EASA.
3. According to my estimate there would be far over 10.000 Aircraft in Germany concerned by this AD. That would lead to a grounding of thousands of AC, lasting for month, without safetybased necessity.
4. The cost and impact of this AD on aircraft owners, is in no relation to the non existent gain in safety.

Commenter 126 : Wolfgang Gockert – 27/01/2010**Comment # 126**

ich weiß schon, dass Sie nur gesetze exekutieren und nicht irgendwie böswillig handeln, aber es kann doch nicht sein, dass man sich hinter den vorschriften versteckt um den hausverstand beim pförtner abgeben zu können. Ihr, die spezialisten wisst wie man ein türchen findet, eine lösung zu bereiten, um nicht in einer völlig überreglementierten zeit, welche sich ganz nebenbei in einer der dramatischsten wirtschafftssituationen nach dem zweiten weltkrieg befindet, mit einer derartigen regelung zwar die sicherheit nicht zu erhöhen, aber enormen wirtschaftlichen schaden anzurichten. der vorschriften wegen..... sollte hier wie auch in anderen ländern ein machtkampf zwischen den alten und den neuen "regelmachern" ausgebrochen sein, na dann ist's wohl vergebene mühe gewesen an Euch geschrieben zu haben.... ein betroffener flugzeughalter in österreich

Commenter 127 : DI Dr. Michael Huber – 27/01/2010**Comment # 127**

As a pilot and owner of a possibly affected aircraft PAD 10-010 is not acceptable for the following reasons:

- safety belts were maintained or repaired by the affected companies according to established standards. Even if these standards are not based on approved design data from the OEMs decades of experience show that these standards do not cause undue risks
- if no undue risks are caused by maintenance and repairs by the affected companies, the replacement costs for thousands of belts is not proportionate to any positive effect the proposed AD might have
- in fact the proposed AD seems to serve commercial interests of the OEMs only, while any effect on safety of flight would be negligible
- I don´t question that maintenance and repairs to belts have to be done by experienced companies according to proven standards, but for

relatively simple tasks and / or non commercial operation EASA should find ways to simplify procedures to enable smaller companies to provide cost effective - yet safe - service to aircraft owners.

Commenter 128 : Hermann Kerzendorf – 27/01/2010

Comment # 128

referring to the comment of the Deutscher Aero Club e.V. (DAeC) I must also admit that I do absolutly not agree to the PAD 10-010. In my oppinion it doesn't make any sense to ground thousands of general aviation airplanes due to probaply salfmade administrative problems. Due to several other inconsistencies in the PAD 10-010 mentioned in the comments of the DAeC I strictly reject the PAD 10-010.

Commenter 129 : EAS AIRBUS Central Entity F, Maryse CASSAGNAU-SEGOL – 27/01/2010

Comment # 129

Please could you take into account the following comments on the Proposed Airworthiness Directive 10-2010.
 AIRBUS concurs with the principle that EASA issue an AD for these safety devices but we would like to have more information about the EASA determination for an unsafe condition.
 The AD is not detailing the nature of the potential unsafe condition .
 Have failures/events been reported in service? No record on AIRBUS aeroplanes.
 How it has been detected?
 What kind of improper maintenances are foreseen?
 What are the potential consequences of such potential improper Maintenance?
 In order to help our customers that are equipped with parts from the listed manufacturers, it would be helpful to provide a range of date when such parts could have been incorrectly overhauled .List of PNs and SNs would be the best. Many thanks for your feedback.

Commenter 130 : Technisches Büro – 27/01/2010

Comment # 130

Es ist nicht zu verstehen warum diese Maßnahme eingeführt werden soll.
 Es gibt sicherlich keine Fälle die dies rechtfertigen.
 Es ist eine weitere maßnahme die in erster Linie Kosten und Bürokratie erzeugt.
 Solch erzeugte Maßnahmen steehn im Widerspruch zur Europäischen Gesetzgebung zur Vermeidung erhöhtem Bürogratischen Aufwand. Es kann kein Grund angeführt werden warum diese Maßnahme notwendig ist.

Commenter 131 : Wärtsilä Deutschland GmbH, Bernd Arfert – 28/01/2010**Comment # 131**

Bravo - nun wird es wohl endgültig gelingen mittels Papier den Deutschen Hobbyflieger das Fliegen restlos zu versauern. Erst war jeder Pilot ein potenzieller Terrorist und musste seine Unschuld durch eine Sicherheitsüberprüfung beweisen. (Natürlich gegen Gebühr)

Dann hat man dank Camo die Motorseglerwarte als unfähig abgestempelt. (Wieder höher Kosten durch Arbeiten eines LTB's)

Und jetzt wird aufgrund von fehlenden Papieren langjährigen Instandhaltungsbetrieben ebenfalls eine Unfähigkeit bescheinigt, obwohl es keinen Beweis dafür gibt, dass die Gurte Fehlfunktionen aufweisen. Bei der letzten Instandsetzung hat die Firma Autoflug mich an die Firma Schlemann verwiesen und jetzt kommt mir die EASA mit irgendwelchen fehlenden Papieren an. Was für ein Spiel läuft hier eigentlich ab? Ich frage mich langsam welche Lobby hier Interesse hat willkürliche Anordnungen auf Rücken der Deutschen Luftfahrer auszutragen. Wir wollen doch so international sein; wie sieht es denn mit dem Rest von Europa aus. Prüfen die überhaupt jemals ihre Gurte bzw. welche Art von Prüfung reicht dort aus? Sichtprüfung bei JNP? Selbstverständlich unterstütze ich jede berechtigte Anordnung, die die Sicherheit des Flugverkehrs betrifft aber in diesem Fall ist es mehr Willkür als Notwendigkeit. Was kommt als nächstes? Muß ich meinen Putzlappen für die Ölstandskontrolle von einem zertifizierten und zugelassenen Hersteller beziehen?

Commenter 132 : Helvetic Airways AG, Daniel Hohl – 28/01/2010**Comment # 132**

EASA and LBA visited Gardiner in November 2009 without a finding concerning seat belt rework.

- Why are only products of selected seat belt OEM's affected?
- Why are only German companies affected?
- The procedure of Gardiner are approved by the LBA which is part of EASA. How can the LBA approve illegal procedures over years 40 years?
- Why does EASA use technical reasons (unsafe product) to protect commercial issues of selected manufacturers?

This PAD is really questionable and affects the technical integrity of the EASA.

Commenter 133 : Jürgen Dressler – 28/01/2010**Comment # 133**

Ich kann nur mein Unverständnis hinsichtlich der beabsichtigten Maßnahmen zum Ausdruck bringen. Als Beteiligter einer Haltergemeinschaft eines Motorseglers ist mein Verständnis nahezu aufgebraucht.

Nach Mod. S Transponder, ELT 406 und Feuerlöscherzwang nun diese Flugzeuggurtpolemik, ich kann es nicht anders bezeichnen.

Wir haben uns bisher an all die Vorgaben gehalten, obwohl wir in Deutschland wohl wieder mal gründlicher waren, als andere, indem wir die Haltbarkeit von Gurten auf 12 Jahre begrenzten. An sich für mich eine sinnvolle Regelung und auch ein nachvollziehbarer Rahmen, wobei ich die Anzahl der Jahre nicht genau beurteilen kann. Ich frage Sie, gab es Fälle, wo Gurte der bisher instandgesetzten Art versagt haben? Kamen Menschen zu Schaden oder geht es wirklich nur um Formalismus?

Letztlich haben doch auch die Herstellerbetriebe ihre Sachkenntnis unter Beweis gestellt und waren zur Ausübung der Arbeiten autorisiert. Wir, die Haltergemeinschaft, haben ein "Forme one" zu den Gurten. Was ist dies denn noch Wert? Was kommt als nächstes, Zündmagnete, Schläuche, sonstige Geräte, die alle ein "Forme one" besitzen?

Wenn Regelungsbedarf besteht in dieser Sache, sollte es mit Augenmaß erfolgen und unter Berücksichtigung der aktuellen Gegebenheiten. Instandgesetzte Gurte könnten doch ohne Not mit einer entsprechenden Ausnahmegenehmigung bis zum Ende der 12 Jahresfrist betrieben werden, es sei denn es gibt objektive Zweifel an deren Sicherheit! Hiervon ist mir bisher nichts bekannt! So kann es nicht gehen. Ich kann nur hoffen Verstand setzt sich durch!

Commenter 134 : Dietrich Völker – 28/01/2010

Comment # 134

I did recognize your intended AD regarding safety belts. As an owner of a glider I'd like to comment as follows: The safety belts are maintained by LTB Schlemann. Safety belts in aircrafts in my understanding are needed for a proper fixation of the place using person. This may be the pilot or others like pax. The fixation is needed for a secure transport when moving through turbulences as well as for take-offs and landings. In the case of a crash there was never experienced that the safety belt itself broke. In this case a fixation of the belt may break away from the seat or other parts of the aircraft.

I want you to specify your concerns regarding LTB Schlemann's maintenance. What was done in an improper way leading to injuries of persons in which kind of aircraft. The planning of an AD has as a goal (additional) security for the aircraft users. If this is not to be seen there is no place for an AD. ADs which only produce additional costs and so far to be qualified only as a cost producer have to be dropped.

I ask you to give me a proof of evidence of your planned AD, that this will lead in fact to a better security for aircraft users in general as well as for users of gliders, motorgliders as well. The phrase "EASA was made aware..." is not enough to require aircraft owners for further actions.

This requested proof of evidence should clearly state how the security was affected before your intended AD and how said AD will improve the security specified for the several groups of aircrafts. This in a way outstanding persons will be able to follow up. Until this is not provided please restrain from your intended AD.

Commenter 135 : Lufthansa Systems Infratec GmbH, Detlev Kellinghusen – 28/01/2010

Comment # 135

Mit Betroffenheit habe ich über die bevorstehende LTA erfahren und muss nun leider auch feststellen, dass nun mehr mein 2 Jahre altes Gurtgeschirr auch davon betroffen sein kann.

Ich fliege auch in anderen Ländern der Welt und da werden Gurte generell on condition geflogen und nur bei akuten Defekt ausgetauscht oder repariert. Nach meinen Kenntnissen ist die 12Jahre Regelung nur in Deutschland eingeführt.

Nun zur Sache:
Was ist an meinen, von der Fa. LTB Schlemann überholten Gurten fehlerhaft, was den erneuerten Austausch des Geschirrs veranlasst?
Ein Austausch des Gurtgeschirrs erhöht in keiner Weise die Betriebssicherheit meines Flugzeugs!
Ich bitte um schnelle Beantwortung eines Schreibens

Commenter 136 : AIR SUPPORT INTERNATIONAL Srl, Francesca Morel Guido – 28/01/2010**Comment # 136**

Our collaboration with the organization LTB Schlemann begins in 2005. In all these years we have sent a lot of safety belts of many aircrafts (Reg: I-, N-, F-,D-,G-) for repair / overhaul (see attached chart): [Ed. No attachment to email]

YEAR	SAFETY BELTS NUMBER
2005	9
2006	21
2007	6
2008	8
2009	18
TOT:	62

We have never had any problem (no failure) in these safety belts repaired / overhauled. by LTB Schlemann, the materials used are excellent (webbing, shoulder belts) and the workmanships (stitching) are good. The organization LTB Schlemann is certified LBA PART145.A.50 n° DE.145.0188 and release the EASA Form One. We don't know the reason for this PAD, but we think that the LTB Schlemann must not be insert in the list of the incriminated organizations.

Commenter 137 : Ryanair, John Clear – 28/01/2010**Comment # 137**

I refer to EASA PAD 10-010 which proposes to mandate the following action:

“No later than 3 months after the effective date of this AD, inspect the markings of safety belts and torso restraint systems, to determine if they have been maintained or repaired by one of the following organisations:

- LTB Schlemann ,
- ACM Aircraft Cabin Maintenance GmbH,
- Gadringer Gurte GmbH, and
- R & S Aircraft Service.”

Our AD Committee has reviewed this PAD and has requested that the following comment be submitted to EASA for review.

Given the range of applicability to the Ryanair fleet (over 210 aircraft with 189 passenger belts) and the fact that Ryanair has reviewed its list of maintenance organisations not used any of the listed maintenance organisations for restraint maintenance, Ryanair requests that EASA considers an inspection of maintenance records as distinct to a physical inspection of all parts, as an alternative means of compliance with the proposed AD.

Commenter 138 : Klaus Kratochwil – 28/01/2010**Comment # 138**

Seit Jahrzehnten führt das vom deutschen LBA lizenzierte LTB Schlemann Nachprüfungen der Gurte für Privathalter und für meinen Verein durch. Nachprüfung meiner Gadringer-Gurte und der Gagringer-Gurte vom Verein werden nicht beanstandet. Nachprüfung meiner Autoflug-Gurte November 2009 entstandene Kosten 214 € wird beanstandet. Genäht mit der gleichen Nähmaschine, vom gleichen Näher, mit den gleichen Gurtmaterial, aber nach kurzer Zeit nicht mehr lufttuchtig. Für mich ist diese Vorgehensweise völlig unverständlich und sollte ihrerseits dringend überarbeitet werden.

Commenter 139 : Sportflug Niederberg e.V., Torsten Polscheit – 28/01/2010**Comment # 139**

concerning your PAD NBR 10-010 it is unacceptable that the problems caused by paperwork and not by unsafe aviation products, will be shifted to all aircraft owners and not to the responsible parties. All our safty belts had been overhauled by licenced German companies as in the years before. We also have JAA Form Ones. So, we can't understand, that these documents should no longer be valid. Be advised, the manufacturers must provide appoved maintenance data to all aircraft owners, and it's up to you to remind them to do their duty. However, have you ever thought about where to get more than 30.000 safety belts in three mounth? And why to change them? None of them are unsafe in physical means. Remember you have been admonished by the European Parliament shortly, to shape the law more customer friendly.

Commenter 140 : GEFIT S.p.A., Carlo Guasco – 28/01/2010**Comment # 140**

please note that all the safety belts manufacturers have used same base materials for the safety straps. I don't know if aircraft manufacturers have considered (in the present and the past) the repair manual of the safety belts... I've never seen them, nor they are indicated in the maintenance manuals of all the gliders and aircraft that I've seen. The PAD 10-010 is not issued for safety reasons (no accidents were caused by safety belts, no people were injured after a crash for problem to the safety belts), but only for a strange, very strange formal problem. All the safety belts manufacturers/overhaulers operates under certification of their national organisation (LBA). The national organisation is certified by EASA. All the aircraft owners with fresh overhauled safety belts can, surely, claim money back to the overhauler (form 1 is, if according to EASA PAD 10-010, not correct). But the belts overhauler can claim money back to LBA, because he was authorized to release form 1. Are you sure that LBA will not claim money back to EASA, for the same reason? You've to check all the aspect of the problem before final decision. EASA must work primarily for the safety of the flight. The problem of the safety belts is only "paper", sure, it doesn't affect the safety of the flight. You can change or upgrade rules only for the safety, not in order to make more complicate or expensive also the simple things. EASA must work to improve the GA in Europe, not to kill GA!!!!!!

Commenter 141 : Rolf Pilgrim – 28/01/2010, Jürgen Blome – 30/01/2010, Reinhold Willems – 31/01/2010, AdvanTec GmbH, Stefan Senger 01/02/2010 - Christian Cramer, 02/02/2010 - Monika Oswald, L. Beumkes, Hugo Jansen 02/02/2010 - Jo Schoeters, Steven Van Loven, Peter Stein 03/02/2010

Comment # 141

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the German aviation. Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time. Let alone providing new ones. As you can see, this AD is not acceptable for all operators and users of aviation witnesses. This AD should not be valid.

Commenter 142 : Oliver Toma, – 28/01/2010 - Karl Guenter Broch - 29/01/2010

Comment # 142

could not believe what I saw when I first read a local aviation magazine with respect to what is planned in the above mentioned “Proposed Airworthiness Directive”. As a result thousand of airplanes within Germany will become grounded. Well, just a matter of money, right?

Shouldn't it be the responsibility of the EASA to monitor that manufacturer of belts/airplanes have to share the “approved maintenance data” with owners and holders of aircrafts? As far as I know this is managed by European law (Part21). But because of not acting accordingly you are now punishing the weakest ones in the chain. Smells like a lot of lobbying, isn't it? I am a member in a club that owns several planes and helps people like me to follow one of the oldest dreams of mankind. But due to such unreasonable regulations your are just preventing people from joining their hobby. Shouldn't you try to align safety and pilot interests?

Initially I appreciated the EASA as successor of the JAR regulations and I saw a big opportunity to avoid and adjust mistakes that happened in the past. But now it reveals once more that it just adds a new tier of bureaucracy and eliminates the GA. Kind regards and hopefully you have review cycles in your PADs,

Commenter 143 : Claus W. Häbel – 28/01/2010

Comment # 143

I can't believe what I've been noticed to. Mein Gott, was haben uns unsere Politiker angetan? EASA selbst und das LBA haben - so mir bekannt ist- Gadringer auditiert und zertifiziert. --> So what?? Hochachtungsvoll,

Commenter 144 : Jürgen Rusch – 28/01/2010**Comment # 144**

[Ed. From PDF attachment] Die vorliegende PAD ist ein Entwurf (Vorschlag) für eine zu veröffentlichende Airworthiness Directive (Lufttüchtigkeitsanweisung der EASA). Im diesem Entwurf stellt die EASA fest, dass für die Instandhaltung von Gurtsystemen durch die genannten Betriebe genehmigungspflichtige Arbeiten durchgeführt wurden, ohne dass die notwendigen Genehmigungen und/oder genehmigte Unterlagen für die Durchführung solcher Tätigkeiten vorlagen. Die EASA sieht darin ein erhebliches Sicherheitsproblem und fordert in ihrer PAD sinngemäß:

1. Innerhalb von 3 Monaten nach Inkrafttreten alle Sicherheitsgurte zu überprüfen, um festzustellen, ob diese von den genannten Betrieben instandgehalten oder repariert wurden

2. Wenn das der Fall ist, müssen alle betreffenden Gurte innerhalb von 3 Monaten ersetzt werden, ansonsten ist der betreffende Sitz stillzulegen

3. Nach Inkrafttreten der Airworthiness Directive (AD) dürfen nur noch zugelassene Systeme, bzw. solche die der AD entsprechen verwendet werden.

Die EASA gibt eine Frist zur Kommentierung der PAD bis zum 10. Februar 2010. Nach Ablauf der Kommentierungsfrist und Überarbeitung durch die EASA soll die AD veröffentlicht werden und tritt 14 Tage nach der Veröffentlichung in Kraft.

Durch diese AD wären in Deutschland ein großer Teil der verwendeten Sicherheitsgurte in der Allgemeinen und Kommerziellen Luftfahrt betroffen. Mehr noch, es kann davon ausgegangen werden, dass auf Grund der knappen Fristen zu Beginn der „Hauptflugsaison“ die Masse der Flugzeuge nicht betrieben werden kann, weil die Forderungen nach dem Austausch nicht erfüllt werden können. Von den auf die Nutzer zukommenden Kosten ganz zu schweigen.

Der Deutsche Aero Club e.V. hat sein Recht der Kommentierung wahrgenommen und seinen Kommentar fristgemäß an die EASA gesendet. (siehe <http://www.daec.de/aktuell/2010/01/Sicherheitsgurte.php>)

In seiner Kommentierung weist der Deutsche Aero Club e.V. die PAD strikt zurück und lehnt diese aus folgenden Gründen kategorisch ab.

1. Die PAD bezieht sich in ihrem Inhalt ausschließlich auf administrative Fehler, ohne einen Bezug auf technische und sicherheitsrelevante Probleme erkennen zu lassen. Bemängelt wird das Nichtübereinstimmen der Angaben zur Instandhaltung bei der Zulassung durch die nationale Behörde mit den Verfahren der EASA und damit mit dem geltenden EU-Recht. D.h. technische Gründe oder Fehlfunktionen der genannten Systeme sind nicht als Grund der PAD angegeben.

2. Da die PAD die Regulierung von Verwaltungsakten beschreibt und keinen technischen Hintergrund erkennen lässt, wird diese als unangemessen abgelehnt

3. Die PAD berücksichtigt nicht, dass bis zum Inkrafttreten der VO (EG) 2042/2003 (verbindlich für die Allgemeine Luftfahrt in Deutschland seit 01.04.2009) alle Verfahren und Regularien der Wartung und Instandhaltung nach nationalem Recht durchgeführt wurden. Das bedeutet, dass Gurtsysteme, die nach diesen Regularien vorschriftsmäßig gewartet wurden, von der PAD zu auszunehmen sind.

4. Die PAD ist nicht geeignet, da sie administrative und Sicherheitsprobleme vermischt. Luftfahrzeughalter, welche durch die PAD betroffen sind, werden mit Nachteilen konfrontiert, ohne selbst dafür Verantwortung zu tragen.

Seiner Stellungnahme fügt der DAeC inhaltlich folgende Kommentare hinzu:

Die Anfrage nach der Korrektheit der Tatsache, dass die Firma „Autoflug“ zwar bei der Gruppe der „Hersteller“, nicht aber bei der Gruppe der „Instandhaltungsbetriebe“ aufgeführt ist. Der Hinweis, dass die Lebensdauer der Sicherheitsgurte im Luftsport zwischen 12 und 15 Jahren liegt. Angesichts der Tatsache, dass das EU-Recht höchstens 6 Jahre (in der Allgemeinen Luftfahrt weniger) gilt, kann die AD nicht für Prozeduren gelten, in denen das EU-Recht noch nicht gültig war.

Besonders im Luftsport haben Rückhaltesysteme eine Lebensdauer von mehreren Dekaden an Jahren, da am Ende der Lebensdauer die textilen Komponenten (Gurte) durch Luftfahrttechnische Betriebe ausgetauscht wurden. Diese Arbeiten wurden durch die Instandhaltungsbetriebe nach routinemäßigen Prozeduren, ohne erkennbares Sicherheitsrisiko durchgeführt. Aus diesem Grund ist es wahrscheinlich, dass ein Großteil der im Luftsport eingesetzten Luftfahrzeuge von der AD betroffen sein würde. Hieraus ergibt sich auch ein beachtlicher wirtschaftlicher Faktor.

Die angegebene Zeitspanne von längstens 6 Monaten nach der Veröffentlichung der AD ist unrealistisch. Sie würde bei der Anzahl der zu überprüfenden und auszutauschenden Systemen und Komponenten dazu führen, dass der Großteil der Luftfahrzeuge nicht in Betrieb genommen werden kann.

Die genannten Luftfahrttechnischen Betriebe führen den Austausch der textilen Teile der Gurtsysteme teilweise schon seit 40 Jahren durch. In dieser Zeit sind keine sicherheitsrelevanten Abweichungen bekannt geworden. Die angewendeten Prozeduren erfolgten auf der Grundlage der Genehmigung und Akzeptanz der Nationalen

Behörden (LBA). Die im AD definierte Luftfahrtuntüchtigkeit der Systeme beschreibt lediglich einen formal-juristischen, administrativen Akt, der in dieser Form nicht akzeptiert werden kann. Die Firmen „Gadringer“ und „LTB Schleemann“ sind zugelassen als Part-145-Organisation seit 2004. Seit dieser Zeit wurden sie durch das LBA mindestens zweimal auditiert. Das LBA selbst wurde durch die EASA im gleichen Zeitraum mehrmals auditiert. Bei einem Audit der Firma „Gadringer“ durch LBA und EASA wurden keinerlei negative Befunde festgestellt. Mit der PDA ist davon auszugehen, dass weder LBA noch EASA ihre Aufgaben in angemessener Weise durchgeführt haben. Es muss untersucht werden, in wie weit LBA und EASA zum Schadensersatz herangezogen werden können. Hinweis: Jeder Luftsportler kann sein persönliches Recht zur Kommentierung noch bis zum 10. 02. 2010 wahrnehmen. Die Kommentierung erfolgt am Einfachsten per E-Mail an die Adresse ads@easa.europa.eu

Commenter 145 : Karl-Heinz Strünke – 28/01/2010

Comment # 145

Wir haben in unserem Verein, LSV Kreis Pinneberg e.V., schon seit langer Zeit überholte Sitzgurte benutzt und bisher keine Probleme damit gehabt. Die Haltbarkeit ist ausgezeichnet und die wenigen ernsthaften Belastungsfälle wurden alle bestanden. Bitte sehen Sie von dem Erlass der AD 10-010 ab, da dadurch die Sicherheit in der Luftfahrt, hier dem Segelflug, nicht erhöht wird sondern nur Mehrkosten erzeugt werden. Falls Sie irgendwelche Technischen Gründe für diese AD 10-010 haben, können die mit Sicherheit von allen beteiligten Firmen abgestellt werden. Lassen Sie dem Piloten die Wahl um hier ohne die Sicherheit zu schmälern einen kleinen Wettbewerb zu erhalten. Das ist sicher auch in Ihrem Sinne.

Commenter 146 : Prof. Dirk Reith – 28/01/2010

Comment # 146

kann ich nur mein äusserstes Befremden ausdrücken. Wenn die EASA weiterhin die Empfehlungen des Europäischen Parlaments, sich kundenfreundlicher zu gebärden, so ignoriert, dann sollte sie sich nicht wundern wenn es eines Tages keine GA mehr gibt. Ob man dann noch alle Mitarbeiter bei der EASA braucht, wage ich auch zu bezweifeln.

Commenter 147 : Diamond Air, Martin Richter-Trummer – 29/01/2010

Comment # 147

In vielen Segelflugzeugen und Motorseglern sind seit vielen Jahren Gurtzeuge eingebaut welche durch die im PAD No.: 10-010 genannten Firmen überholt wurden und mit Form 1 an die Kunden ausgeliefert wurden. Die durchgeführten Arbeiten sind technisch einwandfrei ausgeführt und geben keinen Anlass zu Beanstandungen. Meines Wissens ist, durch die Verwendung solcher Gurte kein Schaden entstanden. Es kam auch zu keinen Gefahren für die Betreiber im Flug oder bei Unfällen. Die Rückhaltesysteme haben einwandfrei funktioniert. Ein Austausch der Gurte oder die Stilllegung des Sitzes ist technisch nicht sinnvoll und stellt einen erheblichen wirtschaftlichen Schaden dar, der von den Haltern zu tragen wäre. Natürlich müssen die Firmen die Überholungen von Gurtzeugen durchführen, dies in gegebener Frist in Ihr POE oder MOE aufnehmen.

Ich hoffe auf eine legistische sinnvolle Lösung des Problems, welche völlig sinnlose kostenintensive technische Maßnahmen ausschliesst. Eine visuelle Kontrolle und das Vorliegen eines Form One sollte ausreichen.

Commenter 148 : Aero Club Dädalus, Edi Wismeth – 29/01/2010

Comment # 148

We are strongly opposing this proposed directive and are submitting protest against it:

1. We suspect that this PAD was created not on grounds of actual failures of, or mishaps with safety belts after overhaul by those named repair facilities. Should we, however, be wrong, detailed information on the incidents causing this PAD could definitely help to put your considerations across.
2. There seems no evidence of unprofessional or faulty or even illegal work of the named Certified Repair Facilities. We had our seat belts overhauled in 2006 by Schlemann, a company holding the LBA Certification in this field. We are convinced this work has been carried out in strict accordance with the valid regulations in force in Germany at that time, and is therefore legal. In addition, we can testify an excellent execution of our order.
3. We see this PAD as purely administrative attempt for action. It definitely will not promote Aviation Safety by actually improving any safety belts, which have been produced by authorized and certified factories, and later overhauled by professional repair facilities in accordance with published rules and regulations.
4. This PAD would lead to an administrative blow with a cudgel.

In particular, its retroactive effect far into the past, when things were subject only to German regulations, should never be accepted. Should this Proposed AD become an official document, we consider taking legal actions against you.

Commenter 149 : FiltoTec GmbH, Stefan Klar – 29/01/2010

Comment # 149

die PAD 10-010 habe ich durchgelesen und teile Ihnen hiermit meinen Protest dazu mit. Begründungen:

- Die in der PAD verpflichtend gemachten Maßnahmen dienen in keinsten Weise der Erhöhung der Sicherheit im Flugverkehr.
- Die Instandsetzung der Gurte erfolgte nach zugelassenen Verfahren durch qualifizierte und zugelassene Unternehmen.
- Sowohl das LBA als auch die EASA hat seit Jahren Kenntnis von dem Verfahren, hat bisher nie die Rechtmäßigkeit in Frage gestellt. Wir als Verbraucher haben zu Recht Anspruch darauf, behördlich genehmigten Verfahren trauen zu dürfen und darauf basierend, Kaufentscheidungen tätigen zu können.
- Die Beschränkung der AD auf bestimmte – in diesem Fall deutsche Unternehmen – widerspricht m.E. dem Grundsatz der Gleichbehandlung.
- Solche Auswüchse, den Bürgern nicht mehr verständlich zu machender bürokratischer Unsinn, an EU-Vorschriften, führen zu einer zunehmende Ablehnung des Grundgedankens der EU!

Falls die PAD 10-010 verpflichtend umgesetzt werden sollte, behalte ich mir Schadenersatzforderungen an Sie vor.

Zur Erläuterung meiner Begründung stehe ich gerne zur Verfügung.

Commenter 150 : Hans Roth– 29/01/2010

Comment # 150

I support the principle that EASA informs the aviation community about upcoming AD's (in issuing PAD's) to get the feedback from the concerned community. I understand that PAD's / AD's are addressing airworthiness issues, concerning the safety and overall operations of commercial and non commercial airplanes.

As a public service EASA is also in charge to support the aviation industry and the flying community in facilitating rules and procedures etc, to improve safety, operations and keeping costs at the lowest level. The responsible (author) of the PAD 10-010 does not respect these obligations! WHY:

REMARK: the following comments are made for the "german part" (LBA and the two concerned maintenance organisations).

> § The PAD do not present any SAFETY and OPERATIONAL item ! It highlights an issue being purely of administrative nature. There was NEVER a case of a FAILURE on safety belts, maintained & repaired by the approved german maintenance organisations (LBA LTB, than JAR 145 NR x) attested by the valid documents, since 2003 by "Form One"

The author mentioned only: " IMPROPER MAINTENANCE OR REPAIR OF SAFETY BELTS>. COULD < RESULT IN FAILURE OF THE SAID SYSTEM..(?)..."

He did NOT INDICATE, that the CONCERNED COMPANIES are working IN ACCORDANCE with the procedures and rules APPROVED by the NATIONAL AGENCY since decades. This included regular successful surveyance and audits.

> §§ BEFORE turning the PAD into an AD:

Could the responsible (s) please EXPLAIN the results of to the INVESTIGATIONS done prior the release of the PAD to get the CORRECT UNDERSTANDING of the subject. The ANSWER should not be later than FEB.08-2010

QUESTIONS:

> What has been done "IMPROPER" in these companies?

> Are the used and approved procedures & rules INSUFFICIENT to get a flight safe product?

> What are the essential differences between TSO maintenance data (ex.AUTOFLUG) and the LBA approved maintenance & repair procedures and rules for safety belts, and which one caused the SUDDEN REFUSAL by EASA?

> What have been the GUIDING FACTS to CHOOSE a SOLUTION (SRAP) which is by far the WORSE ONE beside reasonable OTHER ALTERNATIVES !!!

> Did the RESPONSABLE for this PAD and his SUPERIOR EVALUATE the CONSEQUENCES of such a proposal in terms of overall costs, availability of new parts and operational impacts ????

> Did the responsible estimate the AMOUNT OF A/C and SEATS would be concerned by the AD once released?

> §§§ >>>>>> IF EASA WOULD FINALLY ISSUE an AD - as the - APPROPRIATE > "PROBLEM (?)" SOLVING SOLUTION <it would impose to SCRAP THOUSANDS of AIRWORTHY SEAT BELTS !!! <<<<<<<

>>>>>> DECLARING that the JAR 145 Nr xx/yy approvals of the 2 maintenance organisations and the parts related JAA FORM ONE's will now be INVALID is absolutely R U B I S H !!!!! <<<<<<< (sorry for the word)

CONCLUSION:

1. A release of an AD, i.e. SCRAP of AIRWORTHY SEAT BELTS is UNJUSTIFIED as the concerned parts CONTAIN NO SAFETY RISK to FAIL within the REMAINING LIFE TIME - max 12 years.

If you allow a side remark: As EASA knows well: the repeatable lifecycle could be extended to 15 and more years, without risk due to the qualified material and manufacturing. This could be supported having an inspection at a yearly / periodical A/C check from a given lifetime onwards.

2. The PAD do NOT mention ANY PROOF of WRONG DOING ! The MAINTENANCE / REPAIR, was anyhow DONE IN ACCORDANCE to the PROCESSES APPROVED by the NATIONAL AGENCY.

3. The PAD is only FOCUSED to tackle an ADMINISTRATIVE ISSUE, and this is HIGHLIGHTED as: IMPROPER MAINTENANCE..... COULD (?) RESULT in FAILURE of the said SYSTEM (?) ... see again item 2.

4. The PAD gives the impression that EASA's INVESTIGATION is LIMITED to ONE SOLUTION ONLY: >> SCRAP the "RISKY" PARTS" << ! ALTERNATIVES were possibly not investigated, OR IGNORED ??, Also the NEGLIGENCE of the possible FINANCIAL IMPACT is unbelievable!

I got several feedbacks that this kind of proceeding is not judged as being professional. Its a pity - a missed opportunity !!! Job descriptions may need to be corrected, starting with a PJD >> "Proposal to issue a Job description - amendment"

5. If EASA would finally decide to issue an AD as proposed in the PAD, I herewith PROTEST AGAINST IT. As pilot/owner I'm being concerned by the consequences of this decision, as thousands of others. I do reserve my rights to claim the reimbursement for all costs caused by the actions dictated by the AD. The FINANCIAL IMPACT of the EASA's proposed solution would be same as THROWING MILLIONS of € of tax payers money IN THE DUSTBIN !!! EASA as a PUBLIC SERVICE is COMMITTED to do the UTMOST to AVOID WASTING TAXPAYERS MONEY for nothing. THIS is NOT YET DEMONSTRATED!

Would you please be so kind to:

- revise your position as your "issue" is easy to solve within the "EASA+Nat. Agency Club", no AD is required !
- answer the questions I raised under > §§ in the coming days, latest FEB.08 - before the consultation closure FEB.10-2010 IF EASA STILL INSISTS to RELEASE the AD!

Commenter 151 : Ulrich Böhne – 29/01/2010

Comment # 151

The PAD No. 10-010 should be completely retracted! The reasons: See comments of Deutscher Aero Club. Two additional words: With those activities EASA will lose their credibility concerning air safety aspects! The acceptance of EASA by european aviators is jeopardised!

Commenter 152 : G. Morgenstern – 29/01/2010

Comment # 152

As a Pilot with licence for glider and motorplanes, flying in Germany, I'm affected from the above PAD. Can you imagine the effect of this PAD? Instead of getting in the air and collecting experience, we will be grounded and be able to look after our airfield and polish the planes!

1. It is not to be understood, that due to the not solved differences between manufacturer of belts and repair shops all belts have to be changed or will loose their licensing. Since years it is standard to repair belts and use them in the planes. It is your business to take care, that the actual way of replacing the belts also can be done in the future. There is neither any safety reason visible at the horizon by changing the present way, nor any win in safety!
 2. Can you imagine the cost and the time involved for replacing all belts for privat planes and in civil aviation?
 3. Can you imagine the effect on those companies, which you have mentioned in the PAD? An important share of their business is based on repairing the belts. What is with those workplaces?
 4. Last but not least, it is impossible to replace all repaired belts within a period of three months!
- Please let the above mentioned points slip in your decision with the PAD 10-010.

Commenter 153 : Medice, Rainer M. Knopp – 29/01/2010

Comment # 153

mit Befremden und Unverständnis habe ich Ihre PAD No.: 10-010 zur Kenntnis genommen. Wie ist es nur möglich, rückwirkend etwas für untauglich zu erklären, was sich seit Jahren im täglichen Einsatz bewährt hat? Zu dem Zeitpunkt als die entsprechenden Dinge endlich zur Verfügung standen, gab es meines Wissens noch nicht einmal Ihre Behörde, geschweige denn eine klare Anweisung (gibt es so weit ich informiert bin bis heute nicht) wie die entsprechenden Arbeiten durchzuführen sind. Wie kann man dann ausgesprochen gute Qualität von Gurten, die sich bestens bewährt haben, so vernichtend runtermachen?

Commenter 154 : Frank Patt – 29/01/2010**Comment # 154**

with regard to the afore mentioned PAD I understand that the reason for the directive is not a proven defect or an former accident but uncertainties if the respective maintenance organizations are in compliance with the certification rules and regulations issued by the easa. Having this been said, the proposed measure is absolutely unproportional to the cause. The suggested actions will mean an immense waste of time and money for the entire aviation without any significant increase of safety at all. The execution for about 30.000 belts may keep planes on the ground for an unreasonable amount of time. Thus, I would recommend to discuss the current certification issues with the maintenance companies and – if necessary – have an ex-post-approval given to the maintenance work that was performed. Please notice that the named companies are dealing with safety belts and their maintenance for decades with no issue at all. I cannot see any fact that proves or emphasizes the assumption that with enforcement of the easa-rules the quality of work at the said companies went down to a degree that further usage of the belts will cause a significant risk for aviation.

Commenter 155 : Michael Bergmann – 29/01/2010**Comment # 155**

eine Frage bitte, was ist EASA ??? Ist das eine neue Partei?? Eine Partei für die Abschaffung der Allgemeinen Luftfahrt in Deutschland ??? So lang ich denken kann findet in Deutschland Zivilluftfahrt statt. Jetzt plötzlich, da es eine Partei Namens EASA gibt soll das alles falsch und gefährlich sein was die vergangenen Jahrzehnte funktioniert hat????? Noch ne Frage, sitzt in der Partei auch nur irgend eine Person die schon mal ein Sportflugzeug geflogen hat, oder wenigstens aus der Nähe gesehen hat??? Es kann doch nicht sein dass da jemand wahllos seine schlechte Laune oder sein Unwissen absichtlich an anderen Menschen raus lässt. Oder kann derjenige gar nix dafür, weiß man in der Partei noch gar nicht dass es auch Flugzeuge mit weniger als hundert Sitzplätze gibt!! Nur ein Beispiel, die geplante AD über die Gurte, schon mal an das Auto gedacht??? Da könnte man doch noch ne Partei gründen um noch ein paar frustrierte Menschen zu beschäftigen. Da könnte man bestimmt auch noch ein paar ärgern. Oder Golfschläger, auch sehr gefährlich - da vielleicht noch eine Idee ????? Wenns nicht so ernst und teuer wäre müsste man echt lachen, aber die Partei ist nur zum heulen,

Commenter 156 : Tessel Air, P. Standaard – 30/01/2010

Comment # 156

[Ed. Letter as attachment] In reaction on the proposal to issue an Airworthiness Directive, PAD No.: 10-010, for safety belts and torso restraint systems, we can not accept an AD for some German manufacturers which have been maintaining or repairing safety belts and torso restraint systems for years. Specially when the reason for this AD is that the approved authorised (ETSO) manufacturer does not have an approved maintenance data to maintain or repair safety belts. We contacted some manufacturers mentioned by this AD and some of them told us that they had to get there information by the proposal AD from EASA.. Just those manufacturers who maintained or repaired safety belts for years, had to get the opportunity and time to consider an approved maintenance data to maintain and repair safety belts. Certainly when we understand that the German government approved the maintain and repair of safety belts through these manufacturers for years. And some of these manufactures are (ETSO) approved by EC Regulation part 145 to produce new safety belts. Reading these proposal AD we understand it is not directly a safety item but more a political item to maintain or repair by these manufacturers without an approved maintenance data. We have confidence in the authorities to make decisions based on safety items and not on political items. Specially when these maintain or repair of safety belts are approved for years by the LBA. For many years we used maintained or repaired safety belts of these companies, which are authorised by the LBA. We can not understand and accept that these safety belts are now unsafe and must be changed in to other, most American, safety belts. We think that EASA must give these manufacturers a period of time to satisfy an approved maintenance data. The safety belts which are maintained or repaired by these manufacturers and in use in our planes are prepared under control by the German authorities. EASA must accept the maintain or repair of these safety belts as safe belts, while these belts have been maintained or repaired in that period under control of the LBA. Beside it is not possible to remove and replace all these safety belts in a period of three months.

Commenter 157 : Norbert M. Matzerath – 30/01/2010**Comment # 157**

hiermit drücke ich meinen Unmut und Widerspruch zur EASA PAD 10-010R1 aus, den es hierbei in keinster Weise um ein technisches Problem und schon gar nicht um ein safety item! Eine Lufttüchtigkeits Anweisung (LTA) sollte einen technischen Mangel beheben. Vielmehr wird hier ein Formalismus ausgeübt, mit dem sich die EASA vor den ?Karren der Hersteller? (i.d.R. ex USA) spannt. Die Hersteller haben es vermieden die Passage des Austauschs des Gurtbandes mit in die Instandhaltungsunterlagen einzufügen. Die kompletten Unterlagen werden nur an die vom Hersteller ?authorised Maintenance Organisations? weitergegeben. Die Vorgabe, das die Instandhaltung auf die Approved Data stützen muss, haben wir von der EASA ?geerbt? denn in der JAR 145 gab es noch eine Passage der ?gleichwertigen Sicherheit?. So haben die Betriebe quasi mit ?grandfather reights? weitergearbeitet. Alles andere ist Formalismus und nicht Ziel führend. Zudem wird ein erheblich, wenn nicht sogar ein totaler wirtschaftlicher Schaden in weiten Bereichen der Luftfahrt, insbesondere bei den Instandhaltungsbetrieben, aber auch bei Luftfahrtunternehmen und privaten Haltern erzeugt. Dies ist Formalismus pur ohne technische oder safety relevante Bedeutung. Warum heißt es eigentlich EASA oder wird die Kölner Behörde bald in EAFA umbenannt (mit dem F für Formalismus). Hierdurch leidet auch der international Ruf der Behörde, dies hat damit auch Einfluss auf die den Ruf Europas, der Europa nicht als Wirtschaftsstandort empfiehlt. Hier muss ein anderer Weg gegangen werden: Wenn ein Betreiber eine Produkt einsetzt, oder ein Betrieb die Instandhaltung machen darf muss er auch die notwendigen Unterlagen bekommen können. Und zwar so, das er damit auch realistisch arbeiten kann. Oder man muss ein Verfahren in den Teil 145 einarbeiten, der gleichwertige Sicherheit gewährt z.B. den § 145.A.45 d) erweitern oder entsprechend kommentieren. Mit dem Vorgänger des Teils 145, der JAR 145 wurde bereits Erfahrung hierzu gesammelt. In der JAR 145 gab es den § JAR 145.95 Equivalent safety case. Es geht doch!

Commenter 158 : AVIO TECHNOLOGIES srl., Gianluca Bagioni – 30/01/2010**Comment # 158**

I send my opinion about PAD10-10:

There are no technical and safety reasons published within the document.

Maintenance organisations as Gadringer or Schlemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by certified as Part 145 organisations following approved procedure, accepted by LBA and they released their products or maintained parts to service using an EASA "Form One".

TSO C-22g and AC43.13-1B (chap. 9-46 b) Safety Belts) are approved data.

The Main task of the agency and its related rules is to ensure safety in European aviation under acceptable provisions for the owner of the aircraft used. Therefore, a proposed procedure to fulfil the rules and regulations has also to be written considering the related financial burden or it can jeopardize safety, and last but not least regulations must be written to be followed by all operators, when this not happens if necessary the regulations can be modified, because our first aim must be safety standards.

Commenter 159 : Akaflieg Karlsruhe, Andre Jansen – 30/01/2010**Comment # 159**

unter der PAD-Nr. 10-010 wird eine Lufttüchtigkeitsanweisung (LTA) für verschiedene Muster/Hersteller von Sicherheitsgurten vorgeschlagen, die von vier verschiedenen Firmen instandgehalten/instandgesetzt wurden.

Die angeführte Begründung lautet:

"EC Regulation 145.A.45 requires that (E)TSO approved parts and appliances can be maintained or repaired only if approved maintenance data provided by the (E)TSO approval holder are used, pending the loss of validity of the (E)TSO approval and installation onto the aircraft."

Diese Begründung ist offensichtlich nicht stichhaltig, so daß die vorgeschlagene LTA mangels rechtlicher Grundlage ersatzlos gestrichen werden sollte.

Begründung:

Paragraph 145.A.45 der EG-Verordnung 2042/2003 lautet in seinem Abschnitt d):

"d) Der Betrieb darf Instandhaltungsanweisungen nur in Übereinstimmung mit einem im Instandhaltungsbetriebshandbuch enthaltenen Verfahren ändern.

Hinsichtlich solcher Änderungen hat der Betrieb den Nachweis zu erbringen, daß sie zu gleichen oder verbesserten Instandhaltungsstandards führen, und [...]"

Offensichtlich erlaubt der Abschnitt d) dem genehmigten Instandhaltungsbetrieb Instandhaltungsanweisungen der Hersteller zu ändern.

Wenn er sie ändern darf, dann darf der Betrieb offensichtlich auch eigene Instandhaltungsanweisungen erstellen, da dies ja nichts anderes als eine 100%ige Änderung der Herstelleranweisung darstellt. (Sollten die 100% ein Problem darstellen, so schlage ich vor die gleiche Überschrift für die Anweisung zu benutzen.)

Nichts anderes haben die vier in dem PAD aufgeführten Luftfahrttechnischen Betriebe getan, so daß - anders als im PAD behauptet - schon von daher kein Verstoß gegen Paragraph 145.A.45 vorliegen kann.

Die durch die Betriebe erstellten Instandhaltungsanweisungen wurden im übrigen durch die zuständigen Behörden (das Luftfahrt-Bundesamt/die EASA) bei der Anerkennung der Betriebe als Teil-145-Betrieb und bei folgenden Audits implizit oder explizit mit anerkannt und in der Folge nicht beanstandet. Ein Verstoß gegen Teil-145 kann somit bei der Instandhaltung nicht vorliegen.

Bemerkung: Zusätzlich findet man noch in von der EASA veröffentlichten Interpretationen des Teil-145 folgenden Satz:

"4. In addition to sub-paragraph 1, an organisation with an approval class rating in category C - Components other than complete engines/APUs, should hold and use the following maintenance data where published. The appropriate sections of the vendor maintenance and repair manual, service bulletins and service letters plus any document issued by the type certificate holder as maintenance data on whose product the component may be fitted when applicable."

(http://www.easa.eu.int/ws_prod/g/doc/Agency_Mesures/Certification_Spec/decision_ED_2003_19_RM.pdf - S. 177)

Ich bin über den Umfang der Berechtigungen der einzelnen Betriebe nicht informiert, aber finde es bemerkenswert, daß die EASA für die Kategorie C (und damit C6, wozu ATA 25 gehört) selbst die Einschränkung macht:

"should hold and use the following maintenance data _where_ _published_."

Also: "_where_ _published_"!

Da, laut Angabe der Instandhaltungsbetriebe, die aufgeführten Unterlagen von den Herstellern der Gurtsysteme üblicherweise nicht veröffentlicht werden, scheint es auch Meinung der EASA zu sein, daß die im PAD geforderten Unterlagen den Betrieben gar nicht vorliegen müssen. Auch damit entfällt der Grund für die PAD.-----

Grundsätzliche Bemerkungen:

1. Lufttüchtigkeitsanweisungen sollen zur Behebung von bestehenden oder sich aktuell entwickelnden Sicherheitsproblemen dienen, nicht zur Generierung von Umsatz bei Herstellern oder Wartungsbetrieben. Ein Sicherheitsproblem ist aufgrund der jahrzehntelangen Erfahrung mit den instandgesetzten oder überholten Sicherheitsgurten aber auszuschließen. Als "Beweis" ist die reine Behauptung eines solchen in der PAD ohne reale Evidenz absolut unzureichend. Solche LTAs sind grundsätzlich abzulehnen.
2. Bei einer LTA müssen die Folgekosten für Luftfahrzeughalter und -Betreiber berücksichtigt werden (s. entsprechende Vorgehensweise der FAA). LTAs, die mit einem Kostenaufwand von 10.000.000 mögliche Schäden von 1.000.000 abzuwenden vorgeben sind grundsätzlich inakzeptabel. Eine Kostenabschätzung gehört daher zwingend zum Entwurf einer LTA dazu.
3. Der größte Teil der von dem PAD 10-010 betroffenen Gurtsysteme wurde vor der Gründung der EASA b.z.w. der Anwendbarkeit des Teils-145 auf die vier aufgeführten Unternehmen (und ihre Kunden) gewartet/überholt. Diese Gurtsysteme können daher gar nicht von der LTA betroffen sein, da die Arbeiten an den Gurten im Einklang mit den zur Zeit der Ausführung der Arbeiten gültigen nationalen Forderungen durchgeführt wurden. Es können nicht nachträglich und rückwirkend Forderungen gestellt werden, deren Grundlage zum Zeitpunkt der Durchführung der Arbeiten teils noch nicht einmal existierte.
4. Es steht zwar insgesamt viel zu viel Text in den EASA Regeln, aber grundsätzlich würde man sich den Hinweis wünschen, daß Wartungs- und Instandsetzungsarbeiten immer entsprechend dem allgemeinen "Stand der Technik" ohne explizite Anweisung des Herstellers durchgeführt werden können. Ein Werk wie z.B. das FAA AC43.13 hilft etwa schon sehr weit.

Commenter 160 : Prof. Dr.-Ing. Alexander Bubenik – 30/01/2010

Comment # 160

I'm the deputy chief flight instructor (sailplane operations) of an Aero Club based in the central part of Germany. We are operating a fleet of sailplanes and touring motor gliders in order to pursue our club activities, which involve flight training and flight instruction on a non-commercial basis. The club and its members are a part of the German air-sport-community, which is typical for the majority of Aero Clubs in my country.

PAD 10-010 - if transformed into applicable law - will affect a couple of the club's aircrafts and as well gliders operated by club members. The result from my/our point of view would be at least an unnecessary cost burden without any gain in safety! Regarding this I/we cannot accept the proposed AD and therefore reject it completely!

Explanatory notes to substantiate my/our position:

1. No technical reason or explanation has been given. The PAD seems to be simply based on bureaucratic or administrative issues. No malfunctions or safety related problems have been observed or published by EASA. Consequently implementation of the proposed AD will not enhance safety!

2. The procedures under which safety belt and restraint systems had been maintained in the past were approved and supervised by the German aviation authority namely the Luftfahrtbundesamt LBA. The approved procedures should be regarded as time-tested and well-proven methods. Now EASA alleges that these procedures infringe European law. This in mind the proposed AD must be described as inappropriate. It exposes affected aircraft holders to an adverse situation in which they have to bear consequences of a probably ambiguous legislative setup.

3. Maintenance organisations like “Gadringer” and “Schlemann” have been certified as Part 145 organisations and maintain safety belts and restraints by exchange of the textile and fabric parts for decades. No safety related incidents ever emerged using this kind of belts and/or restraints. Maintenance took place applying approved methods, accepted by a governmental body namely the LBA.

As stated by those companies in letters to their customers both companies were audited at least twice in the recent past by the LBA. It has to be assumed, that neither LBA nor EASA performed their duties in an appropriate manner. In particular Gadringer has told its clients that it was audited by both EASA and LBA without any finding.

Regarding German law especially the Constitution (Grundgesetz) German government and German authorities have to safeguard predictability of legal decisions, sound legal protection and legal certainty. Under German law valid permissions can only be withdrawn if public safety or a comparable object of legal protection are imminent jeopardized. This is obviously not the case, because the by the PAD defined un-airworthiness is only motivated by formal and administrative facts. Due to that the AD is disproportional and therefore not acceptable.

4. The PAD lacks to provide options to certify the aforementioned maintenance procedures ex post to avoid the exchange of all safety belts and restraints affected. EASA is obliged to ensure safety in Europe under acceptable provisions in a way that proposed rules and regulations must consider the related side effects e.g. practicability and financial burden in due proportion to the achievable safety enhancements!

Commenter 161 : Aero Club Volovelistico Toscano, Italy, – 31/01/2010

Comment # 161

Hallo, we are an OR for gliding-license in Italy, our safety-belts have been maintained by Gadringer Gurte GmbH. The service has been excellent and products work very good. ENAC has checked the products on annual renewals of ARC and has made no remarks. We think that the AD proposed is unfair for Gadringer.

Commenter 162 : Tim Henzler – 31/01/2010

Comment # 162

Da ist jetzt ca. 40 Jahre oder länger nichts passiert was auf fehlerhaft gewartete Gurtsysteme zurückzuführen ist, und jetzt kommt EASA und meint alles besser machen zu müssen, als es eh schon ist! Meine Familie fliegt schon über viele Generationen, zum Teil haben sie Lastensegler im Krieg betrieben!

Und den einzigen Vorschritt den wir seit Jahren in der Regelung der ordentlichen Luftfahrt feststellen können ist das sich der Knoten für die privaten Flieger immer enger zuzieht!

Mal schauen ob ich meinen Kinder das Fliegen noch nahebringen kann/ darf, oder ob das gar nicht mehr nötig ist, weil ihr inzwischen alles so geregelt habt, das man einen Flugzeughänger nur noch durch ein zugelassenes LBA öffnen lassen darf, das LBA aber gerade nicht arbeiten darf, weil ihr es falsch auditiert habt!!

Gute Nacht Segelflugszene Deutschland/ Europa

Commenter 163 : Manfred Schumacher (c/o Sabine Ueddinger email address) – 31/01/2010

Comment # 163

Ich spreche mich ausdrücklich gegen die Proposed Airworthiness Directive, PAD No. 10-010 aus.

"Die deutsche Sonderlösung der Lebensdauerbeschränkung von Anschnallgurten hat gerade in Deutschland einen neuen Markt und eine spezialisierte Wartungsindustrie entstehen lassen. Von der luftfahrttechnischen Anweisung sind deshalb ausnahmslos deutsche Betriebe betroffen.

Es ist ein reiner Formalismus und damit eine riesige Geldverschwendung, weshalb jetzt allen, einmal bei den Wartungsbetrieben (LTB Schlemann, ACM Aircraft Cabin Maintenance GmbH, Gadringer Gurte GmbH und R & S Aircraft Service) instandgesetzten Gurten die Zulassung entzogen werden soll. Die EASA hat festgestellt, dass den betroffenen Wartungsbetrieben nicht die Wartungsunterlagen (approved maintenance data) der Hersteller zur Verfügung stehen, also die herstellerseitige Beschreibung, wie die Gurtbänder zu wechseln sind. Die Arbeiten entsprechen demnach nicht den Formalien, worauf die EASA nun nur lapidar feststellt, dass so gewartete Gurte ausgetauscht werden müssen. Und das, obwohl den betroffenen luftfahrttechnischen Betrieben durch die Zulassung durchs Luftfahrt-Bundesamt nach Part 145 bestätigt ist, sachkundig entsprechende Wartungen und Reparaturen vornehmen zu können. Fälle, in denen die gewarteten Gurte versagt oder sich in irgendeiner Weise als unsicher erwiesen hätten, gibt es nicht.

Statt alle Verantwortung bei den Flugzeughaltern abzuladen, wäre es vornehmste Pflicht der EASA, bei den Herstellern auf eine Einhaltung der gesetzlichen Vorgaben zu drängen. Die "approved maintenance data" müssen die Hersteller nach europäischer Gesetzeslage (Part 21) den Eigentümern und Nutzern zur Verfügung stellen, damit diese die Produkte lufttüchtig erhalten und reparieren können! Hier mauern die Hersteller. Statt aber die Hersteller zur Einhaltung der gesetzlichen Vorschriften zu bringen und damit zur Herausgabe der Unterlagen, wählt die Behörde den völlig inakzeptablen Weg, ignoriert die Rechtslage und schiebt alle Verantwortung den Flugzeughaltern zu!

Der Schuss vor den Bug, den das europäische Parlament der EASA erst kürzlich verpasst hat, den Gesetzesrahmen kundenfreundlicher zu gestalten, scheint seine Wirkung bereits eingebüßt zu haben. Die Proposed Airworthiness Directive ist ein bequemer Rückzug ins Formalistische, der den Konflikt mit den Herstellern vermeidet, stattdessen alles dem Endkunden aufbürdet.

Wichtig ist jetzt, der EASA zu zeigen, wie groß die Zahl der Betroffenen ist, die nach der vorgesehenen AD zu massiven Investitionen gezwungen wären, ohne dass die Luftfahrt damit auch nur einen Deut sicherer wird. Ganz abgesehen davon, dass in der vorgesehenen Frist von nur drei Monaten es unmöglich sein wird, alle betroffenen Gurte auszutauschen. Viele Flugzeuge würden dann unklar und müssten am Boden stehen bleiben!"

aerokurier

Dem bleibt nichts hinzuzufügen bis auf die Frage: Welches Ziel verfolgt die EASA mit solchen Aktionen?

Commenter 164 : David Hall – 31/01/2010**Comment # 164**

My attention has been drawn to the proposed PAD 10-010-1. As a sailplane owner and also the person responsible (Werkstattleiter) for the maintenance of our gliding clubs (FSC Rüsselsheim, Germany) 5 gliders, I read with alarm your proposals in the PAD 10-010-1 All our safety harnesses have been maintained in accordance to LBA rules, and renewed by LTB Schlemann to our satisfaction, and at some considerable expense.

If your proposals were issued in an AD, we would be required to replace all our safety harnesses within 3 months, along with most other clubs in Germany.

The costs of doing this, and the probable lack of supply of seat-belts due to your proposal would curtail any flying activity in the following summer period.

LTB Schlemann has been operating since 2004 under the certified Part 145 ruling issued by EASA.

As there have been no recorded failures of seat-belts, this seems to be a purely bureaucratic move on your part which I strongly advise you to reconsider. I understood the creation of EASA was to reduce the bureaucracy within the EU.

Commenter 165 : Jörn Leiber – 31/01/2010**Comment # 165**

if you want to install this AD, you should account for the fact, that any belts have been maintained by the named companies in accordance with LBA (Luftfahrtbundesamt). Approved maintenance data were not obtainable for the companies as far as Gadringer Gurte wrote here: [http://gadringer.de/KD-Info\(2\)_D.pdf](http://gadringer.de/KD-Info(2)_D.pdf). Therefore, it is only acceptable to have this AD effective from a date in the future, when the companies will have had a chance to obtain the missing maintenance data. It is not acceptable to have it effective earlier than the next regular maintenance period.

I never heard of any accidents caused by the belts, so this seems to be an exclusively formal process, which should be solved pragmatically and not handicapping pilots. Thank you.

Commenter 166 : Aleksander Mathia – 31/01/2010**Comment # 166**

pragne dolaczyc sie do tej sprawy,(PAD 10-010-1-1). o toz jest to szykanowanie GA.ze strony niekompetentnych urzednikow EASA. z poszanowaniem

Commenter 167 : Daniel Rubes – 31/01/2010**Comment # 167**

I suppose, these AD is a result of an obsolete approval of the listed companies.

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the European aviation. Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, As you can see, this AD is not acceptable for all operators and users of aviation witnesses.

Commenter 168 : Bernhard Frettlöh – 31/01/2010, Simon Berkhahn – 01/02/2010**Comment # 168**

The PAD 10-010 is not useful due to following reasons:

- there is no reason based on technical facts like accidents or material destruction
- why does the EASA limit special maintenance companies? Are the safety belts repaired by these factories unsafe?

- The result of this AD would be, that thousands of aircraft would loose their airworthiness without technical reason.
 - the EASA would loose it's credibility among a big number of air traffic participants
 I think it is also in the interest of the EASA, to let this PAD not come into effect.

Commenter 169 : Linth Air Service AG, Switzerland, Tobias Herren – 01/02/2010 [

Comment # 169

Now your're going to far!!!!

For what are you doing Audits???

We're working since many years with one of these companys and received the parts always with the proper documents. Suddenly it's not good enough anymore. If you guys like to destroy the small Companys and General Aviation, go ahead like that.

This is technicaly absolutely not a Safety Issue, this is just a **paper war** for office guys...

For the future you might change the procedures for those companys, but everything from the past, leave as it is. Otherwise EASA should take all the finacial damage, because YOU ARE RESPONSIBLE FOR THOSE COMPANYS AND TO PERFORM PROPER AUDITS.

We expect from EASA to check the situation again and hope you will not issue this AD.

Commenter 170 : Paul Harrison – 01/02/2010

Comment # 170

Reading EASA PAD Nr.: 10-010 I understand that EASA has ben informed about this institutional issue. Could EASA provide me copies of the correspondance informig EASA with this information.

Commenter 171 : Piloten-Service Robert Rieger, 01/02/2010 – Luftsportverein Vilshofen e.V, by post, letter registered under our reference A/1093, 03/02/2010

Comment # 171

We are a flying club representing about 300 members.

We operate about 10 aircrafts.

The seat belts were overhauled/repared by the German shops without any problems.

We also never heard about any problems here in Germany.

Our service station has informed us, that we need new belts,

if PAD becomes effective. It`s a lot of money we would have to spend, we have to say for nothing, no improvement.

If the PAD becomes effective, we need more time to get new belts for example 12 month.

We also would prove the possibility to go to court.
We are not alone with this thinking, after contacting many flying club, associations.

Commenter 172 : Piloten-Serrvice Robert Rieger GMBH, W. Rieger – 01/02/2010

Comment # 172

We are now for 38 years in GA Business (maintenance and service) and have never seen a AD/LTA without any safety related problems. Here in Germany nearly the complete GA Fleet is affected (Conform to a german NFL, we have to overhaul, change all belts after 12 Years). In this PAD there are only german shops listed, whats about the other european shops? If you see the experience of 40 Years on som shops with no safety problems, we can not understand the reasons. It's not possible to replace all belts in 3 month, also if you order new parts in USA. The aircrafts will be grounded with all the financial effects. Please cancel this PAD and develop a solution not to ground the complete fleet. Hoping to hear better news.

[Ed. Comments (same) also received as letter by post, dated 01.02.2010, and registered in Adonis under reference. A/1068]

Commenter 173 : Bachmann Datentechnik & Profil Aviation GbR, Klaus Bachmann - 01/02/2010

Comment # 173

Regarding AD 10-010: We are very confused about this proposed AD.
Our airplanes are serviced by professional and licensed service stations under strict consideration of valid European laws and regulations.
We are not able to understand this kind of AD, which is far removed from any practical significance and only close to an incredible bureaucracy.
Don't forget: Planes are NOT flying by regulations but by physical laws only!

Commenter 174 : Jürgen Koch– 01/02/2010

Comment # 174

I am a pilot since 25 years and I never heard about such procedure.
Also I am a free business man since 27 years and in my opinion it is not possible to dictate witch comany we have to work with. that's against the free market.
I want you to recall the PAD 10-010 due to following reasons:

- the PAD is not based on technical facts in regard to materials, technical processes or any air traffic incidents
- it is not the task of the EASA to limit or to regulate the competition of several maintenance companies in such a radical way regarding the process of communication and timeline of this PAD
- the (relative young) agency EASA could loose it's credibility among a big number of air traffic participants, if the EASA do not base their decisions on strong (technical) facts
- the (relative young) agency EASA could loose it's credibility among all the other authorities who are responsible for free trading and competition --> in nearly all other

(european) business areas, it is the task of the manufacturer to publish technical documents/processes to enable legal and approvable maintenance for their products. Did the listed manufactures have published any maintenance documents? Did the listed maintenance companies have done the repair not according to such a document?

I think it is also in the interest of the EASA, to let this PAD not come into effect.

Commenter 175 : ZVC Volkel, Hugo Ording – 01/02/2010

Comment # 175

Can you explain why I have to remove these belts? Why is it not possible to INSPECT these belts? Why did you choose for the ultimate solution and destroy belts which are 100% acceptable from a technical point of view?

Looking forward to your answer, best regards Hugo. (Chief Technician, ZVC Volkel).

Commenter 176 : Swiss Helicopter Maintenance AG, Switzerland, Gerhard Müller – 01/02/2010

Comment # 176

We are aware of subject AD. Kindly advise some more information why LTB Schlemann GmbH is not allowed to perform repairs on seat belts and restraint system. In the AD is mentioned that this company works without holding approved maintenance data. Your prompt reply is highly appreciated!

Commenter 177 : FRIEDRICHS FILTERSYSTEME GMBH, Dipl.-Ing. (FH) Andreas Friedrichs – 01/02/2010

Comment # 177

I am extremely worried about the practices concerning the above mentioned directive. A system which is running without any trouble since so many years shall now be obsolete?!? And the reason for this is, that the easa doesn't do it's job to make the approved maintenance data available?!? Shame on you!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Commenter 178 : TASC Engineering GmbH, DI Martin Schuster – 01/02/2010

Comment # 178

I find there should, at least be a period of 3 years or even longer, in which seatbelts which have not been maintained according to 10-010!! I am flying in a glider club in Innsbruck and we have not experienced one single failure of any kind of seatbelts!! We are mostly using Gadringer seatbelts. I could understand if there were a

regulation that from now on seat-belts must have a EASA form 1 and/or be maintained in a JAR 145 environment. This would result in all seatbelts being replaced within the next 12 years as this the TBO for all seat-belts we use for gliders.

So please check, if such measures have to be taken in such a short time especially as there is no sort of damage record what so ever!!

All together the safety principles of EASA seem to be exceeding the limits! I cannot understand why for instance a single-engine DA40 should be safe in IFR conditions where there are records of several engine failures?? UL-planes are mostly much more complex than gliders and are not EASA-type aircraft and can be operated under national law? I cannot judge about commercial operations and maintenance, but there must be difference between commercial airline business and a glider in pilot-owner maintenance or a C172 in non-commercial environment. I feel that the requirements are rising and rising without any particular reason, apart from regulating aircraft maintenance in one single system. There just seems to be no system which works for all airplanes without difference of type, size... The safety question seem to largely be dependent on commercial interests but not on the safety issue of the single product! What's the use of a 10-010 seatbelt if the weakest point is somewhere quite different??

So please could you take a good look at which regulations (specially in pilot-owner maintenance) are absolutely necessary and which regulations could be abandoned and left with national authorities. That worked quite well during the last few decades and would work perfectly again without EASA!

I hope that my ideas can contribute to an amendment of PART M as well as the actual 10-010 issue!

Commenter 179 : Philipp Erhard – 01/02/2010

Comment # 179

this AD would ground almost the whole general aviation in middle europe. There ist absolutely no reason to question the proper function and security of the mentioned belt systems since there are absolutely no incident known to the authorities related to the maintenance procedures. To punish most of european private aircraft owners instead of changing the future monitoring of maintenance organisations affected is the worst approach to the problem.

Keep them holding approved maintenance data for the future but don't touch safety belts and torso restraint systems maintained or repaired by the mentioned organisations in the past as they all work perfectly safe!

Commenter 180 : Klaus Burkhard – 01/02/2010

Comment # 180

als Halter eines Segelflugzeuges vom Typ SB5e mit amtlichem Kennzeichen D-6300 erhebe ich hiermit fristgerecht Widerspruch gegen o.a. PAD bezüglich überholter Flugzeuggurte.

Ich habe am 25.08.2003 mein Gurtsystem des o.a. Segelflugzeuges vom LTB Schlemann GmbH überholen lassen. Dabei wurde ein neues Gurtschloss vom Typ Autoflug sowie zwei fabrikneue Bauchgurte und zwei fabrikneue Schultergurte eingebaut.

Die Gurte haben eine Laufzeit bis 2015, somit verbleiben also noch 5 Jahre Restlaufzeit.

Die Firma LTB Schlemann ist ein vom Luftfahrt-Bundesamt der Bundesrepublik Deutschland zertifizierter und meines Wissens auch regelmäßig überprüfter und auditiert LTB nach JAR 145.

Nachdem der Firma LTB Schlemann GmbH nach meinem Wissensstand die Zulassung nach JAR 145 nicht entzogen worden ist, darf ich wohl auch davon ausgehen, dass die dort überholten Gurtsysteme den einschlägigen Vorschriften entsprechen.

Ich widerspreche demzufolge der o.a. PAD No 10-010 und bitte um Prüfung und um Widerruf.

Commenter 181 : Kölner segelflieger e.V., Matthias Krause – 01/02/2010

Comment # 181

wir halten die per PAD 10-010 angekündigte AD-Note für unangemessen, weil keine Gefährdung der Flugsicherheit durch irgendeinen belegbaren technischen Mangel gegeben ist.

- die vorgeschlagenen AD-Note auch Gurte einschliesst, die vor dem Inkrafttreten der EU-Vo 2042/2003 nach gültigem nationalen Recht instandgesetzt wurden. Dies ist ein klarer Formfehler.
- hier rückwirkend eine langjährig geübte Verfahrensweise der Instandhaltungsbetriebe für nicht regelkonform betrachtet wird, obwohl diese Betriebe durch Audits des LBA und der EASA regelmäßig überwacht wurden. Insbesondere ist es nicht akzeptabel, dass dieser formelle Fehler der Behörden zu zusätzlichen Kosten für die Halter der Luftfahrzeuge führen soll.

Für unseren Verein bedeutet die Herausgabe der AD-Note in der vorgeschlagenen Form möglicherweise die temporäre Stilllegung von Flugzeugen und zusätzlichen Kosten, wodurch die gemeinnützige Jugendförderung massiv berührt wäre. Der durch die AD verursachte Schaden steht in keinem Verhältnis zum Auslöser der AD, insbesondere weil keine Sicherheitsgefährdung vorliegt.

Commenter 182 : – Jens Reen - 01/02/2010

Comment # 182

i am a 23 year old glider owner from germany and the seatbelts of my glider are valid until 2014. i use "gadringer" seatbelts, which are high-quality seatbelt. there have never been any problems with these seatbelts anywhere in the world. i can claim: the seatbelts in my glider are guarantors of a safe flight. in addition to that, i can't afford any new seatbelts, as i am a student. now the easa says there is something wrong with the seatbelts/ the seatbelt-company/ the manufacturer, which definitely is not true. i highly recommend not to implement easa (p)ad 10-10. i would not accept such a regulation. did you ever think about the consequences of that ruling? it would be ridiculously unfair and unjust. furthermore it would be extremely expensive for the manufacturers and at the end for the plane-owners, like me. the ruling is completely senseless, causeless and unfounded!

Commenter 183 : Ulrich Mildenberger – 01/02/2010

Comment # 183

this (P)AD (look above) could not be meant serious?!?
Do you have had any problems with safety belts in millions of cases?
Pleas beware of this nonsense!

Commenter 184 : – Prof. Dr. Walter Stühmer 01/02/2010**Comment # 184**

I just successfully registered into the EASA CRT to comment on PAD 10-010, but was unable to access the Proposed AD to file my comment. How should I proceed?

Commenter 185 : Said Kutschekmanesch – 01/02/2010**Comment # 185**

I suppose, these AD is a result of an obsolete approval of the listed companies.
 The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years.
 In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.
 There are considerably consequences for the German aviation.
 Apart from that fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably would not be enough capacity to overhaul the system once again in a short time.
 Let alone providing new ones.
 In addition I would like to draw your attention on the reply of the DAEC
 (<http://www.daec.de/aktuell/downfiles/2010/CommentsofDeutscherAeroClubtoEASAPAD10-010.pdf>)
 As you can see, this AD is not acceptable for all operators and users of aviation witnesses. This AD should _not_ be valid.

Commenter 186 : Dr. Marko Roczniak – 02/02/2010**Comment # 186**

Since my aircraft is equipped with Gardinger belts, I want to comment, the above mentioned PAD:
 I belief that the (P)AD is not balanced, since only belts of a few manufacturers are affected. This is unfair, since from all over Europe only the four German manufactures/maintains service companies are affected.
 For over 40 years Gardinger did manufacture and maintained belts, without a single issue regarding safety or used material.
 Especially voiding of all work done by Gardinger under their valid permission is totally unacceptable!
 Kindly I would like to ask you, to rethink the content of the (P)AD and to stop it.

Commenter 187 : ASL nv, Belgium, Bernard Biquet – 02/02/2010

Comment # 187

I'm operator of three aircrafts where their seat belts are affected by this proposed AD.
On the required actions it is not possible to allow us to request a re-certification/test of all affected seat belt to an approved shop instead of their replacement?.
This could reduce the cost impact.

Commenter 188 : Jürgen Hiller – 02/02/2010

Comment # 188

ich bitte Sie um Sachverstand in der Angelegenheit!
Beweisen Sie dass Sie nicht nur ein Steuerverschwendungsbetrieb sind!!!

Commenter 189 : Marius Dreier – 02/02/2010 - Tobias Dreier 03/02/2010

Comment # 189

I suppose, this AD is a result of an obsolete approval of the listed companies.
The German LBA has admitted these overhauls in the past. There have been no security problems for at least 25 years. I don't know only one accident to be caused by malfunction of safety belts.
In my opinion it is completely incomprehensible in what manner the security should be improved, if only four german companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of safety belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.
There are considerably consequences for the German aviation.
Apart from the fact that no improvement of safety is necessary nor can be achieved by this exchange, there probably wouldn't be enough capacity to overhaul the system once again in a short time, so that most of the gliders and airdrafts are grounded.
As well, the replacement of 'invalid' belts is no opportunity. One reason would be the underutilization production capacity of the belt manufactures, the other reason ist the financial strain for the club's/owners.
For example, my gliding club would have to replace 15 belts with a price of 300 € per unit. That makes 4.500€!!!
As you can see, this AD is not acceptable for all operators and users of aviation witnesses.
This AD should not be valid.

Commenter 190 : Gerd Porzky – 02/02/2010

Comment # 190

wir halten diese Maßnahme für total überzogen. Was wollen Sie der Hobby-Luftfahrt noch reindrücken.....

Commenter 191 : Hartmut Schlüter – 02/02/2010**Comment # 191**

I please you to recall the PAD 10-010 due to following reasons:

- it is not the task of the EASA to limit or to regulate the competition of several maintenance companies in such a radical way regarding the process of communication and timeline of this PAD
- the PAD is not based on technical facts in regard to materials, technical processes or any air traffic incidents
- the (relative young) agency EASA could loose it's credibility among a big number of air traffic participants, if the EASA do not base their decisions on strong (technical) facts
- the (relative young) agency EASA could loose it's credibility among all the other authorities who are responsible for free trading and competition --> in nearly all other (european) business areas, it is the task of the manufacturer to publish technical documents/processes to enable legal and approvable maintenance for their products. Did the listed manufactures have published any maintenance documents? Did the listed maintenance companies have done the repair not according to such a document?

I hope, it is also in the interest of the EASA, to let this PAD not come into effect.

Commenter 192 : LGW-Maintenance, Frank Scherber - 02/02/2010**Comment # 192**

wäre es nicht sinnvoller, die von den betroffenen Firmen bisher angewendeten Standards und Verfahren auf Zuverlässigkeit und Kompatibilität mit den Originalherstellerunterlagen zu überprüfen, statt jahrzehntelange Erfahrungen einfach zu ignorieren und durchgeführte Arbeiten als wertlos zu klassifizieren?

Auf welcher Grundlage wurden die Wartungsarbeiten denn bisher durchgeführt? Gurtsysteme der Automobilindustrie, eigene Entwicklungen, Standardverfahren für Gewebegurte, Verriegelungssysteme, ... ?

Es ist bestimmt nicht aus dem hohlen Bauch heraus herumgewerkelt worden, denn wie kann es sonst sein, das die deutsche Luftfahrtbehörde bei ihrer Auditierung und Lizenzierung offenbar keinerlei Bedenken hatte.

Zu Berücksichtigen wären die Folgen eines derartigen AD: Kosten für die Lfz-Halter, höchstwahrscheinliche Lieferschwierigkeiten der Hersteller, nicht mehr lufttüchtige Lfz,

Seltsam auch, daß eine Behörde, die vor 2002 noch gar nicht existierte, auch vor diesem Zeitpunkt durchgeführte Arbeiten, die vom LBA abgesegnet waren, in Frage stellt.

Die Hersteller der originalen Gurtsysteme wird es freuen - Ein Schelm, der Arges dabei denkt.

Commenter 193 : Spanair Engineering Division, Spain, Marcos Masclans – 02/02/2010**Comment # 193**

My name is Marcos Masclans and I am the Engineer in charge of Cabin and Environmental Systems in Spanair (JKK) with my colleague Jaime Sirer.

We received some days ago the PAD 10-010 and we have some comments related to it. We would be very grateful if you considered our suggestions in order to study some changes on a future AD.

1. Maintenance Data. Paragraph 2 of PAD "Reason".

a. Ideas:

- The PAD talks about Maintenance data required by EC Regulation 145.A.45.
- The information we have from ACM Aircraft Cabin Maintenance GmbH is that they have a CMM of the components they work with that maybe is not a complete manual on some chapters.
- It seems that the problem lies in the business relationship between OEM and some Maintenance Organisations.
- The CMM used by the Maintenance Organisations is maintenance data provided by the OEM.

b. Suggestions:

- As both of them have presented discrepancies on this issue, we require a Regulation clarification regarding the CMM detail required for doing this kind of maintenance tasks.
- The conclusion of this point is that any OEM which has edited and distributed abbreviated CMM's to Maintenance Organisations could not refute it now with the resulting prejudice for the Operator.

2. Failure and action. Paragraphs 3 and 4 of PAD "Reason".

a. Ideas:

- Spanair is aware of the result of an improper maintenance overhaul on restraint systems.
- Spanair has no evidence of failures on restraint systems during the whole operation of the company.
- Spanair has no evidence of any Service Failure reported by any other Operator in accordance of AMC and GM Part 21A.3B prior the issue of this PAD.
- The action required is "replace", without knowing the maintenance tasks performed on the unit (they could be from a simple re-labelling to a complete re-sewing, as an example).

b. Suggestions:

- It seems that there is no evidence of cause-effect that explain the root of this AD.
- The action ("replace") seems to be excessive in relation to the tasks actually performed and the failures reported.

3. Compliance Time. Paragraphs (1) to (3) of PAD "Required Action(s) and Compliance Time(s)".

a. Ideas:

- In accordance with the information we have from the OEM, the common lead time for the restraints systems are 6 (six) weeks minimum.
- In case of issuing an AD, the OEM could not be able to provide material for all the customers, giving us a lead time greater than 6 (six) weeks. We are asking them now for the exact lead time in that case.
- According to an initial analysis of our fleet, more than the 70% of the restraints systems installed could be affected by this PAD. It means more than 6.000 (six thousand) units affected, near to 3.000 (three thousand) of them of the same P/N.
- The cost of the material given by our initial analysis is more than 378.000 USD (three hundred and seventy-eight thousand). Moreover, it is necessary to add a considerable number of Man-Hours and special ground times to perform this job on time and the cost inflation of some components (some P/N quotations are from 2000 and 2007).
- Spanair is not responsible for this situation and thinks it is not fair that the Operator will assume the modification cost on an issue that lies in a business conflict between OEM and Maintenance Organisations.
- The OEM has not given any other solution than a replacement for the units affected.
- Restraint systems are a common PN in our stores so we have a lot of units that could be stated as scrap and it is not an acceptable maintenance action.

b. Suggestions:

- In case of issuing an AD, we shall require more than 3 months to perform a total replacement of the units affected.
- We need an answer from the OEM to know its capability to provide stock for all the Operators affected.
- We need a solution via Service Bulletin to solve the solution of the units affected instead of a "replacement".

Thanks in advance for your attention. I hope these comments and suggestions are useful for you. In case of having any doubt, please do not hesitate to contact me.

Commenter 194 : Finn Skjoldborg – 02/02/2010

Comment # 194

I strongly support the inclosed "Protest over EASA PAD No.: 10-010".

Regarding EASA PAD No.: 10-010, Safety Belts / Torso Restraint Systems: I must strongly object to this PAD based on reasons for the PAD and proposed action. The main task of the agency is to ensure safety in European aviation under acceptable provisions for the owners and operators of the aircraft used. This PAD is doing the exact opposite.

There is no record of failed belts, and there is full traceability, giving no reason for this PAD.

I must point out the following:

- The restraint systems were released into service, with a Form One
- The companies are approved by the Authorities and have maintained the belts under this authorization for many years.
- Quality of the belts has not declined or changed. The rules have changed
- LBA has audited the companies without any findings.
- EASA has audited LBA without any findings.

And yet this PAD is incriminating the four companies and their authorization, and subsequently the LBA and its authorization as regulatory oversight for EASA?

It is retrospective legislation and cannot be accepted.

The proposed handling gives further reason for objection as listed below:

- This PAD will effectively ground all affected aircraft until all affected restraint systems have been identified, removed and replacement systems have been installed.
- The downtime and price for replacement serviceable parts will be extreme, leaving the owners and operators as innocent victims.
- The timeframe will further add to this problem, as the industry cannot perform a task of this magnitude without further numbers of aircraft being grounded due to required maintenance tasks delayed by this PAD
- It is impossible for the industry to produce thousand of belts within the time given for this PAD.

I see fit that LBA and EASA give time to correct this problem, instead of replacing affected restraint systems and buy new only due to a paper work and regulations.

If the companies can prove the belts conforms to all requirements, and that materials and methods are equal to or better than that of the restraint systems from other manufacturers, it should remain in service.

Proposed solution:

- Identify all restraint systems affected by this PAD within a defined period of time acceptable to the operators.
- Inspect a percentage of the belts from each of the four companies.
- If there are no significant findings release the belts back into service.

Any Proposed legislation must look forward, not backwards. I strongly support the above arguments.

Commenter 195 : CAT FLYSERVICE ApS, Denmark, Peter Højgaard – 02/02/2010**Comment # 195**

Attached is or comments to PAD 10-010.

We are a small maintenance organisation maintaining approximately 50 single and twin engine piston aircrafts. Half of the aircrafts have seat belts installed which have been maintained or repaired by one of the PAD 10-010 affected companies. We have the following comments to PAD 10-010.

- The PAD 10-010 seems to address administrative issues instead of safety related problems.

The cost for a replacement is approximately 1000 euro average / aircraft, making the financial impact for small operators and owners, which have installed the belts in good faith, very high compared to the gain in safety.

- The replacement of webbing has been commonly accepted by the European aviation industry and European aviation authorities. The PAD 10-010 will affect the companies, who have performed the work with their authorities blessing, very hard.

- It is our belief that the local European authorities and the Agency must stand by their previous decisions. Instead of grounding the majority of European GA aircrafts with huge cost to follow, the resources should instead be used on getting the companies performing this kind of activities properly approved.

- If PAD 10-010 is introduced the compliance time is too low. It is impossible for the industry to meet a demand for several thousand belts within 6 months. The proposed compliance time will therefore most likely result in grounding of a vast majority of the affected aircrafts.

Commenter 196 : Dr. Christian Ortner – 02/02/2010**Comment # 196**

AD's like this are classic examples of pure bureaucracy without any safety reason. Exactly such facts are jeopardizing the acceptance of EU and EASA.

And such facts are suspicious to be only scorned restraints of trade and not questions of safety.

First: There is absolutely no accident where the missing of special

maintenance data (more special, established by the TSO approval holders instead of general overhaul instructions established by the authority) for overhaul of safety belts has resulted to a malfunction or even a bad workmanship. It makes no sense to establish maintenance data for absolutely trivial worksteps, which are the worksteps cutting a belt and sew it together, for an authorized maintenance organisation producing seat belts.

And it makes no sense to require special maintenance data established by the manufacturer where general instructions are satisfying.

I can make a certification for my own person and establish maintenance data for everything I do, as trivial as it might be. If there are maintenance data missing for the noseblowing process, I will be unable to blow my nose.

That's nonsense, absolutely!

The only malfunction of a seatbelt I know was the inadvertent opening of an original and new PZL belt system during an aerobatic flight in Niederöblarn, Austria in 1996.

The reason was not using unserviceable parts nor wrong material or bad sewing, it was a bad construction from an ergonomic point of view.

Second: It might be justifiable to require maintenance data for mechanical

parts such as springs, wear on pins or so, if there is a locking mechanism where such things are applicable. But there is absolutely no importance to remove the belt systems within 3 months, it will absolutely be sufficient to make sure, that at next periodic overhaul time the mechanical parts will be inspected or changed if they are subject of wear. But this aspect is just established in the overhaul instructions approved by LBA and EASA and there are absolutely no experiences that these general instructions would not be sufficient.

Third: It is absolutely unacceptable that only four organisations will be

affected and this only concerning original belt systems of the enumbered manufacturers. If there is a safety problem with one of the products of one of the manufacturers, there must be established an AD for this special product, if the general overhaul instructions will be recognized as insufficient for this product. And the AD must establish the suitable maintenance data. Everything else is very suspicious to be only a scorned restraint of trade.

Commenter 197 : Hans Braun – 02/02/2010

Comment # 197

in the past I agreed with most of the new regulations . Some improved things, some did'nt. But this AD 10 010 does not improve anything, except the income of the listed companies. The German LBA has admitted these overhauls in the past 25 years without any security-problems. In my opinion it is completely incomprehensible in what manner the security should be improved by exchanging the saftybelts . More or less this is merely a result of a complaint of certain producers of seat belts and is leading to considerably consequences for the German aviation. This AD is not acceptable and leads to a very critical view against the EASA. It should not become valid.

Commenter 198 : Klaus Hartung – 02/02/2010

Comment # 198

As holder of a Aeronca Chief 11AC build 1947 (annex II). I have heard about the proposal to issue an airworthiness directive regarding seat belts.

The company aeronca stopped producing this aircraft more than 60 years ago.

3 Years ago I installed new seatbelts made by LTB Schlemann. 40 years ago (so is my information) this company got the approval to maintain seatbelts from the german LBA. Over the years several old sets of belts were repaired by this company. And they did the maintainance without any complains and remarks. But now they do that illegal because of the missing approved maintainance data.

I know that regulations have to be followed but why is my aircraft sudden grounded and why do I have to pay because of these regulations which are

- new made because of new rules not existing at the time the aircraft was designed and build and
- not having any influence in the safety of my aircraft?

Please explain me why it is affecting the safety of my vintage aircraft using Schlemann belts and why companies not beeing in germany buid better safety belts and what the difference is regarding their quality.

Thanks for your answer,

Commenter 199 : Aerofox, France, Pascal Aubert – 02/02/2010

Comment # 199

We reject PAD 10-010. There is no relation with a technical and safety related problem.

Commenter 200 : Klaus Peter Gies – 02/02/2010**Comment # 200**

I'm a glider pilot since 1979 in an Aero Club based in the central part of Germany. I am the owner of two private used gliders and two 40 years old touring motor gliders. My club and its members are a part of the German air-sport-community, which is typical for the majority of Aero Clubs in my country.

PAD 10-010 - if transformed into applicable law - will affect a couple of the club's aircrafts and as well gliders operated by club members. The result from my/our point of view would be at least an unnecessary cost burden without any gain in safety! Regarding this I/we cannot accept the proposed AD and therefore reject it completely! Explanatory notes to substantiate my/our position:

- No technical reason or explanation has been given. The PAD seems to be simply based on bureaucratic or administrative issues. No malfunctions or safety related problems have been observed or published by EASA. Consequently implementation of the proposed AD will not enhance safety!

The procedures under which safety belt and restraint systems had been maintained in the past were approved and supervised by the German aviation authority namely the Luftfahrtbundesamt LBA. The approved procedures should be regarded as time-tested and well-proven methods. Now EASA alleges that these procedures infringe European law. This in mind the proposed AD must be described as inappropriate. It exposes affected aircraft holders to an adverse situation in which they have to bear consequences of a probably ambiguous legislative setup.

Maintenance organisations like "Gadringer" and "Schlemann" have been certified as Part 145 organisations and maintain safety belts and restraints by exchange of the textile and fabric parts for decades. No safety related incidents ever emerged using this kind of belts and/or restraints. Maintenance took place applying approved methods, accepted by a governmental body namely the LBA.

As stated by those companies in letters to their customers both companies were audited at least twice in the recent past by the LBA. It has to be assumed, that neither LBA nor EASA performed their duties in an appropriate manner. In particular Gadringer has told its clients that it was audited by both EASA and LBA without any finding.

Regarding German law especially the Constitution (Grundgesetz) German government and German authorities have to safeguard predictability of legal decisions, sound legal protection and legal certainty. Under German law valid permissions can only be withdrawn if public safety or a comparable object of legal protection are imminently jeopardized. This is obviously not the case, because the by the PAD defined un-airworthiness is only motivated by formal and administrative facts. Due to that the AD is disproportional and therefore not acceptable.

The PAD lacks to provide options to certify the aforementioned maintenance procedures ex post to avoid the exchange of all safety belts and restraints affected. EASA is obliged to ensure safety in Europe under acceptable provisions in a way that proposed rules and regulations must consider the related side effects e.g. practicability and financial burden in due proportion to the achievable safety enhancements!

Commenter 201 : BBAL, Wolfgang Itting and Hans-Peter Gomolzig – 02/02/2010**Comment # 201**

here I send you the comment on PAD 10-010 of the organisation BBAL Bundesverband der Betriebe der Allgemeinen Luftfahrt e.V.

[Ed. attachment] Der BBAL als Interessenvertreter der MRO Betriebe in Deutschland nimmt wie folgt zu der geplanten PAD 10-010 Stellung:

Nach Rücksprache mit unseren Mitgliedsbetrieben haben wir festgestellt dass bis auf wenige Ausnahmen alle D-registrierten Luftfahrzeuge mit in Deutschland instandgesetzten Gurten ausgerüstet sind. Dies wurde bei der geplanten Umsetzung der AD bedeuten, das

allein in Deutschland im Bereich der General Aviation ca. 50.000 Gurte nicht lufttüchtig sind.

- Alleine aus diesem Grunde halten wir die Fristen der "Compliance Time" für unakzeptabel. - Es gibt kein nachweisbares Sicherheitsrisiko aus vorliegenden Schadensfällen, die auf mangelhaft durchgeführte Instandhaltungsarbeiten schließen lassen. - Es gibt europaweit / weltweit, außer den deutschen Instandhaltungsfirmen, Anbieter die die Dienstleistung der Oberholung anbieten. Diese wurden in der AD nicht erwähnt, also auch nicht überprüft ?

- Der BBAL ist besorgt über die angekündigte AD da die Umsetzung weitreichende Probleme in Europa zur Folge haben wird. Wir fordern hier unter Abwägung aller Faktoren eine Umsetzung der AD mit Augenmaß. Es besetzt derzeit kein eklatantes Sicherheitsrisiko welches die Einschränkung der Luftfahrt, wie es aus der geplanten AD zu erwarten wäre, rechtfertigt.

Based on input from our associated organizations we have concluded that with only few exceptions the majority of all D-registered aircrafts are equipped with restraint systems that have been repaired in Germany. In Germany alone there would be approximately 50000 restraint systems that are not airworthy if the AD is implemented as drafted.

- For this reason we consider the 'compliance time' deadline of 3 months unacceptable.

- There is no verified safety risk based on any known incidents that is associated with inappropriate maintenance operations.

- In addition to German maintenance organizations there are organizations worldwide and within Europe that provide maintenance services. These organizations are not mentioned in the AD. Does this mean that they have not been inspected?

- The BBAL is concerned about the projected AD as the implementation would result in significant problems in Europe. We request an implementation that considers all facts. At this time there is no significant safety risk that would justify aviation restrictions as projected by the proposed AD.

Commenter 202 : AOPA-Germany, Dr. Michael Erb – 02/02/2010

Comment # 202

Below please find AOPA-Germany's comment on EASA PAD No: 10-010.

AOPA-Germany strictly rejects PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems - Inspection.

The above mentioned PAD would have an extremely negative impact when coming into effect as published. Thousands of General Aviation aircraft are equipped with Safety Belts produced by the named manufacturers and maintained or repaired by the affected organisations. After a first estimate we believe that more than 30.000 Safety Belts would need to be exchanged in German registered aircraft.

As certified replacements for these Safety Belts are not available within the set deadline of three months in the needed quantity, the affected aircraft would have to be grounded.

If there were indications that safety was compromised by the affected Safety Belts, immediate action had to be taken and AOPA-Germany would support this action.

But there is no indication at all that a safety issue exists. Even EASA does not request immediate action and opens a discussion with the stakeholders on the topic.

Instead the heart of the problem seems to be merely an argument on "formalities" between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organisations. Aircraft operators simply must not become victims of this argument. Since 2003 EASA is responsible for Airworthiness of Aircraft in Europe. Most of the affected Safety Belts were maintained under authorisation of the German Luftfahrtbundesamt, already many years before EASA took over its responsibility in 2003. So it's not understandable why even these Safety Belts repaired and maintained before 2003 should be affected by a conflict the maintenance organisations presently have with newly created EASA regulations.

Because all affected aircraft operators had their Safety Belts maintained and repaired in good faith by organisations under the oversight of the Luftfahrtbundesamt

and/or EASA, the question of liability claims against Luftfahrtbundesamt and EASA will definitely arise when the PAD comes into force as drafted.

Commenter 203 : Wolfgang Trinks – 02/02/2010

Comment # 203

Zu oben genannter Proposed AD möchte ich wie folgt Stellung nehmen:

Die betroffenen Gurtsysteme wurden, nach der Auskunft des Instandhaltungsbetriebs, nach genehmigten und somit dokumentierten und nachvollziehbaren Verfahren durchgeführt.

Federführende bzw. überwachende Behörden dieser Verfahren waren LBA und EASA (siehe entsprechende Prüfbescheinigungen, u.a. EASA FORM 1)

Daher ist jedes einzelne Gurtsystem eines Typs, das nach dem jeweiligen vorgeschriebenen Verfahren von einem Instandhaltungsbetrieb überholt wurde als Referenz zu allen ausgelieferten Gurtsystemen des gleichen Typs durch denselben Betrieb qualifiziert.

Falls die federführenden Behörden nun Zweifel an Ihren bisherigen Handlungen haben, ist es somit möglich die Einhaltung der Hersteller-Spezifikation an einem Gurtsystem der jeweiligen Charge zu überprüfen.

Wenn, als Ergebniss dieser physikalischen Prüfung das Gurtsystem nicht lufttüchtig ist, wäre die PAD 10-010 ein geeigneter Weg einer Gefährdung von Personen oder Sachen vorzubeugen.

Gleiches würde gelten, falls im Rahmen von Flugunfall Untersuchungen eine statistisch auffallende Zahl von versagenden überholten Gurtsystemen der angesprochenen Instandhaltungsbetriebe im Vergleich zu den Originalen festgestellt wird.

Ebenso könnte eine fehlerhafte oder unvollständige Dokumentation einer der genannten Instandhaltungsbetriebe Zweifel an der Lufttüchtigkeit einzelner Exemplare aufkommen lassen.

Aus meiner Sicht kann die Entwertung von privatrechtlichem Eigentum, das der Käufer in Treu und Glauben erworben hat, in diesem Fall durch die Widerrufung der Lufttüchtigkeit der von der PAD betroffenen Gurte nur bei Vorhandensein einer Gefährdung gerechtfertigt werden.

Die PAD spricht nur von einer "möglichen Gefährdung" und führt keine physikalischen Gründe oder Vorkommnisse an. Sie adressiert allgemeine formale Hintergründe in Bezug auf EASA Richtlinien.

Dabei unterscheidet sie nicht zwischen Systemen, die im Zeitraum der EASA Zuständigkeit (seit Sept.2003) überholt wurden und Systemen, die bereits zuvor unter ausschließlicher Anwendung von nationalem Recht überholt wurden.

Commenter 204 : SG Benediktbeuern , Lutz Kasang – 02/02/2010

Comment # 204

es kann doch nicht sein, dass durch diese AD führende Gurthersteller und bisher eingetragene und anerkannte Instandhaltungsbetriebe ihre Zulassung verlieren. Es gibt viele Flugzeuge auf dem Markt, wo es keine Musterbetreuer und Hersteller mehr gibt. Es ist daher nicht möglich über die Musterbetreuungsschiene jemals wieder Gurte für diese Flugzeuge zu bekommen. Bevor Sie auf die Gurte losgehen, sollten Sie lieber alle anderen Instandhaltungsprogramme und deren Unzulänglichkeiten und Verwirrungen in den Griff bekommen. Zur Zeit gibt es an allen Fronten nichts anderes als Verwirrung.

Ich lehne die von Ihnen angestrebte Vorgehensweise strikt ab.

Commenter 205 : Deutsch-Amerikanischer Segelflug-Club e.V., Roger H. Dunn – 02/02/2010**Comment # 205**

Charge: We contend that EASA PAD 10-010 as a directive is INVALID, UNJUST and ILLEGAL.

Preamble:

To be valid and just, a law must fulfill certain generally accepted requirements:

- 1: a law shall regulate a known or correctly anticipated need or deficiency in community behaviour and action.
- 2: a law shall follow the principle of "Ocham's Razor", i.e., a simple solution must take precedence over a complicated solution.
- 3: a law shall exhibit the characteristics of proportion and moderation.
- 4: a law shall be useful, thus producing an improvement within the community.

Our contention is that PAD 10-010 violates all 4 of the above requirements.

Arguments:

ad 1: the requirement to insure safety of pilots and passengers in General Aviation (GA) is long recognised and valid. The question here is: "Is there an actual deficiency or need?". The answer is "NO" - EASA has presented no evidence showing that the present situation, which has been stable and absolutely uneventful in the last 20 years, has deteriorated. There have been no fatalities or injuries resulting solely from deficient Seat Belts from the aforementioned companies during this period. Simply stated, there is presently no need for a new law/directive.

ad 2: the "simplest solution" is to require EASA to oversee, with adequate controls, and enforce the ruling that all firms dealing with restrictive Safety Belts meet agreed-upon standards. These firms in Germany have, over the past years, conformed with procedures specified by the German Luftfahrtbundesamt (LBA) with excellent results, e.e., no fatalities or injuries due to Seat Belts. The EASA is opting for a "complicated solution" in that it is abolishing long-existing successful measures, and substituting a major change to the system requiring a complete change of direction. It is very interesting to note that in all of Europe only firms in Germany are to be affected! Very unusual!

ad 3: PAD 10.010 violates the principle of proportion and moderation. This AD will effectively ground the entire GA Fleet of airplanes in a very short period of time to achieve a goal that is, at the very least, extremely questionable. According to comments of the Deutscher Aero-Club (already submitted to EASA), approximately 14.000 GA-Aircraft will be affected with total costs exceeding €10.000.000 !! This violates the principle of proportion and moderation. Training, necessary for safe flying, will not be able to be timely accomplished; the requirement for safety in aviation will be severely compromised. Furthermore, the industry producing Seat Belts will not be able to comply with the immediate demand, but rather, will need many months to produce an adequate supply of the required product.

ad 4: Improvement of the present situation cannot and will not take place since there is no present deficiency or problem with Seat Belt fatalities/injuries within Germany. The present system, approved and supervised by the LBA, has proven to be absolutely adequate and safe. PAD 10.010 neither improves nor increases usefulness for the community.

Actual Case:

The Deutsch-Amerikanischer Segelflug-Club, e.V. (DASC) consist of approximately 95 members, 40 of whom are active pilots. 8 of these 40 active members are young students in various phases of flight training preparing for their flying licenses. Our club inventory consists of 6 sailplanes with a total of 8 seats, a touring motor glider with 2 seats, an Ultralight with 2 seats and a single-engine piston airplane with 5 seats. All of these seatbelts have been inspected by a licensed repair station within the last 3 years and are worthy for service for 12 years. A total of 17 new seatbelts at approximately €300 per item would result in a one-time expenditure of € 5400, an extreme cost for our small flying club of private aviators. Our 8 young students will have to forego training for months (see submitted comments of Wolfgang Siegel), an extremely unfortunate situation. Numerous active pilots who must complete their training flights within the next few months to retain validity of the flying licenses will be hindered here, causing re-examination and unnecessary additional administrative procedure. All of this is in reality unnecessary and non-useful.

Conclusion:

The DASC contends that PAD 10-010 is invalid, illegal and unjust and as such, must be rescinded.

Commenter 206 : André Grabs – 02/02/2010

Comment # 206

die oben genannte PAD 10-010 "Safety Belts" möchte ich wie folgt kommentieren und beantrage die PAD aus folgenden Gründen zu verwerfen:
Sinn und Zweck einer AD ist es, technische oder sicherheitsrelevante Probleme an Luftfahrzeugen oder damit verbundenen Komponenten ausreichend schnell zu beheben. Meist sind zuvor Probleme bei den Betrieb oder der Wartung solcher Teile oder Komponenten aufgetreten, die - um eine Sicherheitsgefährdung zu vermeiden - eine AD notwendig machen.

Die PAD 10-010 allerdings trifft genau hierbei völlig ins "Leere": Bislang ist kein einziges technisches oder sicherheitsrelevantes Problem, weder beim Betrieb noch bei der Wartung der betroffenen Gurte oder Gurtschlösser, die von den in der PAD genannten Betrieben überholt worden sind, aufgetreten. Einziger Anlass der AD ist anscheinend die Feststellung der EASA, dass die seit Jahrzehnten gängige und vom Luftfahrtbundesamt genehmigte Praxis hinsichtlich der Überholung der Gurte hier in Deutschland sich nicht aus den seit dem 01.04.2009 geltenden Regularien für die Wartung und Instandhaltung von Luftfahrzeugen herleiten lässt. Allein aus diesem Hintergrund so eine PAD zu veröffentlichen, die einzig die administrativen und verwaltungsrechtlichen Schwächen bei der Harmonisierung der EU-Richtlinien mit dem bislang national geltendem Recht aufgreift, ist nicht Sinn und Zweck der Vorschrift. Die PAD ist daher vollkommen unangemessen.

Weiterhin ist festzustellen, dass bis zum Inkrafttreten der EG-Verordnung 2042/2003 zum 01.04.2009 die Wartung und Instandhaltung nach nationalem Recht erfolgt ist. Gurte, Gurtschlösser etc., die vor diesem Datum entsprechend der zu diesem Zeitpunkt gültigen Vorschriften gewartet oder überholt worden sind, können generell überhaupt nicht hiervon betroffen sein, da eine Rückwirkung der neuen Richtlinien für vor dem 31.03.2009 durchgeführte Wartungsmaßnahmen nicht Ziel der EG-Verordnung 2042/2003 ist.

Luftfahrzeughalter würden bei Inkrafttreten der AD unangemessen benachteiligt, obwohl oder gerade weil sie an die bis dato geltenden Vorschriften gehalten haben. Ich würde gerne wissen, ob Ihnen zu dieser geplanten AD eine sinnvolle Kosten-Nutzen-Analyse vorliegt? Ein sicherheitsrelevanter Nutzen ist für die allgemeine Luftfahrt nicht einmal entfernt erkennbar - Kosten jedoch schon.

Die Firma Gadringer ist wie auch der LTB Schlemann als Part-145-Organisation zugelassen. Demnach gehe ich davon aus, dass diese Betriebe entsprechend von Ihnen überprüft worden sind. Nach den mir vorliegenden Informationen sind hierbei keine sicherheitsrelevanten Bedenken oder Beanstandungen zu verzeichnen gewesen. Demnach ergeben sich auch aus dieser Perspektive keine sinnvollen Anhaltspunkte, die die PAD 10-010 rechtfertigen könnten.

Weiterhin ist mir unverständlich, warum die PAD ausschließlich deutsche Betriebe betrifft. Aufgrund der Ausführungen in der PAD wären zumindest alle europäischen Wartungsbetriebe, die Gurte in gleicher oder ähnlicher Weise überholen, ebenso betroffen. Die PAD ist demnach überaus ungleichmäßig.

Anscheinend wird mit der PAD versucht, verwaltungsrechtliche Probleme zwischen Ihnen - der EASA und dem Luftfahrtbundesamt - LBA - sehr kostenintensiv und sehr bürokratisch zu lösen. Dies darf nicht auf dem Rücken von mehreren tausend Luftfahrzeughaltern ausgetragen werden.

Ihrer Rückantwort sehe ich entgegen.

Commenter 207 : FSA Segelflug Aachen, Martin Kämper – 02/02/2010

Comment # 207

in den vergangenen Jahren haben wir als Verein unsere Gurte beim LTB Schlemann erneuern lassen. Die Arbeiten wurden nach LBA genehmigtem Verfahren ausgeführt und die Gurte in erstklassigem Zustand zurückgesandt.

Wir können keinen Grund erkennen, warum diese Gurte nun vernichtet werden sollen. Auch die EASA Kommentierung gibt keinen Schadensfall als Begründung an, sondern lediglich einen Formfehler? Wir sehen die Verhältnismäßigkeit der Maßnahme als nicht gegeben und bitten um Überarbeitung der PAD 10-010.

Commenter 208 : Guido Hasel – 02/02/2010

Comment # 208

hiermit erhebe ich gegen die PAD 10-010 Einspruch.

Begründung: Die von Fa. Gardringer instandgesetzten Rückhaltesysteme fremder Hersteller wurden nach den zum Zeitpunkt der Instandhaltung geltenden Vorschriften behandelt. Diese Vorschriften wurden sachlich nie von den nationalen Luftfahrtbehörden beanstandet oder für ungültig erklärt. EASA erläßt nun diese Vorschriften ohne einen konkreten Beweis für sachliche Probleme zu haben für nichtig. Dadurch entstehen dem Flugsportverein Sindelfingen Kosten, die nicht gerechtfertigt sind.

Commenter 209 : Peter Baustetter – 03/02/2010

Comment # 209

we are holding a glider affected by the announced AD and therefore we reject the PAD as an inappropriate regulation. There is no technical reason published within the document. The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. We as owner of the glider affected by this PAD are faced by disadvantages without any responsibility in this case.

Commenter 210 : ELESTA relays GmbH, Jürgen Steinhäuser – 03/02/2010

Comment # 210

In meinem Beruf bin ich selbst in Normungsgremien aktiv und weiß welche Ansprüche an technische Regularien gestellt werden. Daneben bin ich Fallschirmwart und mir sehr bewusst was es heißt für andere Verantwortung zu übernehmen (Ehrenamtlich und ohne kommerziellen Hintergrund). Die vornehmste Pflicht von Normativen bzw. Sicherheitstechnischen Regularien ist es die Sinnhaftigkeit zu wahren. Gleichzeitig ist man als Ersteller von Regularien angehalten die Konsequenzen des eigenen Tuns zu hinterfragen. Wenn dieses nicht passt ist die Akzeptanz nicht gewährleistet. Als öffentliche Einrichtung ist man aber auch den Bürgern der EU verpflichtet. Somit stellt sich mir die Frage was ist die Intension Ihres Handelns. Ist es das langfristige Ziel ist die Privatfliegerei abzuschaffen. Das einfachste Mittel dazu ist es Kosten so zu erhöhen. Dies ist bereits jetzt durch die Regularien zu den Betriebshandbüchern der Fall, die DG-Flugzeugbau schon optimal als Gelddruckmaschine umgesetzt hat, ohne das dabei nur ein Funken an höherer Sicherheit erzielt wird.

Die EASA ist verpflichtet die Interessen der Flugsicherheit zu vertreten, gleichzeitig sind Sie auch dem Bürger verpflichtet. Dies bedeutet für mich, auch in hohem Maß den Vereinen. Gerade in der Jugendarbeit übernehmen diese unentgeltlich für die Gesellschaft viel Verantwortung. In der unentgeltlichen Ausbildung der Jugendlichen führen wir diese sowohl an die Aspekte des Fliegen, wie auch an die Sozialkompetenz in hohem Maß heran. Oft führt diese Grundausbildung später zu einer Tätigkeit in der Luft- und Raumfahrtindustrie. Somit fördern wir unentgeltlich die Nachwuchsförderung für eine der europäischen Schlüsselindustrien. Mit unverhältnismäßigen Kostenerhöhungen ist sicherlich bald der Punkt erreicht dass dies nur noch in geringem Maß machbar ist. Bitte bedenken Sie bei all Ihren Entscheidungen das neben dem höchsten Anspruch an Sicherheit die Zweckmäßigkeit und Wirtschaftlichkeit nicht unter den Tisch fallen.

Commenter 211 : LSV Gifhorn e.V., Tassilo Bode and Andreas Horn – 03/02/2010

Comment # 211

Comments of LSV Gifhorn to EASA PAD No: 10--010 [Ed. Attachment].

Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection. PAD 10-010 is strictly rejected by LSV Gifhorn due to the following reasons:

The Luftsportverein Gifhorn e.V. (LSV Gifhorn) is a non-profit association with the objective of promotion of instruction for glider pilots and training for cross country and contest flying. All our staff members - from flight instructors to board members - are working on an honorary basis. Our club operates its own glider field "Wilsche" near the town of Gifhorn where about 40 gliders / TMGs and 6 SEPs are located.

PAD No 10-010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem. The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reason for the PAD are not given.

LSV Gifhorn rejects the PAD as an inappropriate regulation as only formal, administrative arguments are presented for the described regulation. There is no technical reason published within the document.

The PAD addresses all safety belt systems maintained or repaired by the mentioned companies. EU-VO 2042/2003 came into force for aircraft under non commercial operation in Germany on the 1. of April 2009. At the earliest, this regulation was applicable on the 28. September 2003, before that all procedures for any maintenance or repair issue were performed under effective national rule. Therefore, any safety belt system repaired or maintained under those valid regulations before that date has to be exempted from the PAD.

The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. The owners of aircraft affected by this PAD are faced by disadvantages without any responsibility in this case.

The life span of safety belts used in gliders is 12 or 15 years. Accordingly the last maintenance or repair can have been up to 15 years ago. EU-VO 1702/2003 and 2042/2003 has been only in place for 6 years, for non commercial operated aircraft since April 2009. Before these dates, all maintenance or repair work was performed under national law. The AD cannot be valid for any of those procedures as no European law was in force.

The textile component of the safety belts used in gliders or SEPs was exchanged at the end of the life span by a maintenance organization. This was a routinely performed procedure without any observed safety risk. Due to this, it can be assumed that a major part of the aircraft used in air sport is affected by this AD. Even more, as many of these aircraft have a lifespan of several decades.

Maintenance organizations as Gadringer or Schlemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by an approved procedure, accepted by an approved organization namely the LBA. The maintenance organizations "Gadringer" and "LTB Schlemann" are certified as Part 145 organizations since 2004. They release their products or maintained parts to service using an EASA "Form One". Since 2004 both companies were audited at least two times by LBA. LBA itself was audited several times. In particular it has to be stressed that the company Gadringer-Gurte was audited by EASA and LBA without any finding. Due to that the AD is in form and content not proportionate and unacceptable.

If the AD would become effective many of our gliders have to be taken out of operation. It is absolutely unrealistic that the manufacturers of safety belts for gliders and SEPs will be able to produce the large amount of new safety belts within a short period. To prevent an undue hardship from our club and all glider and SEP owners the PAD 10-010 has to be deleted without replacement.

Commenter 212 : Christoph Berner – 03/02/2010

Comment # 212

I suppose, these AD is a result of an obsolete approval of the listed companies?

The German LBA has admitted these overhauls in the past. There have been no problems in security for at least 25 years!

In my opinion it is completely incomprehensible in what manner the security should be improved, if only four German companies are concerned by this AD. More or less this is merely a result of a complaint of certain producers of seat belts. I suppose that it is an attempt to disparage the competitors and bring some money into their pockets.

There are considerably consequences for the German aviation. No improvement of safety is necessary nor can be achieved by this exchange. I guess most of the aircraft owners affected by this AD will fly less in their aircrafts to save the money for new seat belts, and thereby flight safety is impaired much more.

As you can see, this AD is not acceptable for general aviation. This AD should not be valid.

Commenter 213 : Flugwerft Steinle GmbH, Monika Steinle – 03/02/2010

Comment # 213

ich möchte zu der oben aufgeführten proposed AD wie folgt Stellung nehmen:

Die PAD bezieht sich **nicht** auf das Auftreten eines technischen Problems, bzw. einen sicherheitsrelevanten Vorfall, der durch einen technischen Defekt der betroffenen Gurtsysteme hervorgerufen wurde.

Betroffen von dieser AD wären auch und vor allem Gurtsysteme, die vor in Kraft treten der VO (EG) 2042/2003 von den genannten Luftfahrttechnischen Betrieben nach genehmigten Verfahren und nationalem Recht überholt oder repariert wurden.

Daraus ergibt sich für mich formell schon ein rein juristisches Problem, und die Fragestellung, ob dieser Sachverhalt vor Gericht Bestand hätte.

Von dieser AD betroffen wären beispielsweise in unserem Instandhaltungsbetrieb **alle** ca. 130 betreute, nichtgewerblich genutzte Luftfahrzeuge bis 2 t von privaten Haltern, rein rechnerisch ergäbe dies einen finanziellen Aufwand von rund 90.000 EURO. Von dem finanziellen Aufwand abgesehen, läßt sich die Umsetzung der PAD rein logistisch innerhalb der genannten Frist nicht bewältigen, so daß ein Großteil der Flugzeuge gegroundet wären- was den finanziellen Schaden weiter erhöht.

Da diese PAD ein ausschließlich administratives Problem betrifft, ohne jeglichen sicherheitsrelevanten Hintergrund wäre die Umsetzung in meinen Augen fragwürdig.

Commenter 214 : Vorstand Segelfluggruppe Benediktbeuern, Hans-Otto Pielmeier – 03/02/2010

Comment # 214

Die geplante Neuregelung zur Instandhaltung von Flugzeuggurten stösst auf unser Unverständnis. In unserem Verein werden Flugzeuge geflogen, für die es keine Hersteller und Musterbetreuer mehr gibt. Mit der konzipierten Regelung können diese Flugzeuge auf Sicht nicht mehr geflogen werden, wenn bisher funktionierende Prozesse außer Kraft gesetzt und bewährte Gurthersteller ihre Zulassung verlieren. Wir fordern Sie auf Ihre Verfahren zu überdenken und entsprechend zu ändern. Aufgrund der Tragweite behalten wir uns rechtliche Schritte vor.

Commenter 207 : Swiss Helicopter Association, Andreas Meier – 03/02/2010**Comment # 207**

Enclosed we send you a letter (.pdf-file) concerning the EASA PAD No. 10-010. [Ed. From attachment]
 I'm writing as a member of the managing committee of Swiss Helicopter Association (SHA). I'm responsible for all technical issues applied to this association by the Swiss helicopter operators and maintenance organisations. On behalf of our members, I address on your authority as follows. .
 Most of all helicopter operators and Part-145 maintenance organisations send their safety belts to the companies listed in PAD No. 1 0-01 0, Par. (1), for repair or overhaul. This repair stations maintain the parts according high quality standards and reasonable turn-aroundtime.
 Also they have a Part-145 approval issued by the LBA and all documents delivered are in conformity with Part-145 regulations. We don't know about any safety or operational problems using such repaired belts. During several system and product audits performed by the Swiss civil aviation authority, (FOCA), we never heard of any objections against this suppliers.
 The consequences of a non-installation directive according PAD No.1 0-01 0 would be dramatic for the industry, as the original manufacturers won't be able to support all operators and maintenance organisations with replacement products in time. For operational and economical reasons we ask you to reassess PAD No.1 0-01 0 and to withdraw the required actions for the benefit of the aviation industry. Thank you for your appreciated assistance.

Commenter 208 : Ingenieurbüro Flugwesen und Biomechanik IFB AG, Stefan Freudiger – 03/02/2010**Comment # 208**

Please find my comment of disappointment as follows:
 Safety belts are generic equipment and should be maintainable by generic procedures. Web material, stitch pitch, thread material and sewing techniques should rather be easy for properly being specified and inspected. Generic equipment should normally be governed by Technical Standard Orders and general maintenance procedures (e.g. highly valuable FAA AC43.13 handbooks). Such valuable handbooks are overdue for being issued by EASA. This PAD No 10-010 demonstrates the failed EASA approach: Instead of elaborating and improving valuable and safe procedures, EASA prefers to hinder and prohibit proven past methods. Why does EASA so often chose the simplest way, deteriorating aviation business and compromising aviation safety evolution? Is EASA missing own experts, devoted to aeronautics with adequate experience? I thank you for your consideration!

Commenter 209 : LSC BAYER LEVERKUSEN e.V, Helmut Koch – 03/02/2010

Comment # 209

We hereby object to PAD No.: 10-010. It is not perceptible that aviation safety is in any way endangered by shortcomings in connection with the overhaul of safety belts. Likewise, no malfunctions during the use of the restraining systems have come to our attention. All belts our aircraft are equipped with have been overhauled in aeronautical engineering companies authorized according to Part 145 on a regular basis, and put back into operation supplied with a proper JAA FORM ONE. We expect you to provide us with a statement based on facts of a kind that would make such a short term measure that is so far-reaching from a technical point of view appear necessary. Looking forward to hearing from you at your earliest convenience.

Commenter 210 : Luftspvtervereinigung lthwiesen e.V. (Germany), Winfried Küter– 03/02/2010**Comment # 210**

attached you'll find my comments to PAD 10-010. Please account for further decisions. Thank you! [Ed. Attachment] in addition to the comments of „Deutscher Aero Club“ you already have received, please note following comments:

Comment 1: Identification of affected parts

Due to the exchange of the belt in case of most maintenance actions the markings of the original manufacturers have been removed. The original manufacturer name in most cases can not be identified by examination of the retaining original parts like safety belt lock. Even by the entries in the EASA FORM ONE the manufacturer cannot be identified in many cases. A procedure for unique identification of the manufacturer has to be defined.

Comment 2: Practicability of PAD 10-010 Regarding comment 1 I often tried to contact the appropriate company concerning the technical content of the requirements, nominated at 3rd point of the remarks in the PAD 10-010:

Schroth Safety Products GmbH

The only result I got is the telephone number of the contact person: Melanie Hollmann, phone +49(0)2392/9742-134. Obviously it is not possible to get any information caused by too many inquiries. Either the line is busy or nobody takes the call or the voice mail system takes the call. Even before the AD is active the responsible companies are overstrained by essential questions. Therefore the PAD 10-010 cannot be practicable. Please not the 4th comment of “Deutscher Aero Club” regarding this problem.

Commenter 211 : Eric Munk – 03/02/2010**Comment # 211**

I am writing to you to vote my objections to your PROPOSED AD 10-010 regarding aircraft belts (published 14-01-2010). While I am usually one to strictly adhere to AD's and manufacturer's SB's, I must say I have but rarely seen such an outrageous, misplaced, inappropriate and unnecessary (proposal for) an Airworthiness Directive in all my years as a qualified pilot and mechanic.

Allow to explain myself:

- This PAD 10-010 has all the markings of putting right an administrative failure, over the backs of thousands of aircraft users and owners WHERE THERE IS NO SAFETY RISK. There are no technical grounds carried as an argument in the PAD 10-010 at all.

- Maintenance to the affected belts was carried out by an EASA approved (Part 145) organization that was regularly audited by EASA, as was the Luftfahrtbundesamt (LBA). The workshops involved were certified, qualified, well equipped and highly experienced in this specialized sort of maintenance. As a customer of the EASA LICENSED workshops I was acting in good faith, indeed in good confidence to have my belts properly done at a highly specialized and licensed shop, only to have all work annulled years later by a paperwork issue which does not lie with either the companies involved or myself.

- There's also the point which I am quite sure has been pointed out by the official reaction by the Deutsche Aeroclub (DAEc), that even if European approval for these workshops were to be withdrawn in retrospect, maintenance up to 1-4-09 was still done according to national (German) regulations. I refer to the letter DAEC has written to you on this subject for more details.

- The effect of your PAD 10-010 is enormous. Thousands of aircraft will be grounded worldwide BECAUSE OF A PAPERWORK ISSUE with authorities (EASA, LBA), not because of technical or safety reasons. This happens at the start of the flying season in Europe. There is simply no capacity for complying to your rules using existing workshops if there were to be a term of only three months to comply. Years of work simply can't be redone in three months.

Again, I strongly suggest you come to your senses regarding this PAD 10-010 and do the decent thing: withdraw it. As a European citizen I have the strong feeling this kind of bureaucracy (i.e. rules as a goal, not a means) are killing for our industry, where we seem to only have the common goal: making aviation safer.

Commenter 212 : Enrico Bagnoli, Italy – Enrico Berthod, Italy – 03/02/2010

Comment # 212

I express my disapproval and annoyance referring to the PAD N.° 10-010. It's a nonsense that owing to a bureaucratic reason and not for a real technical problem I have to put on ground my glider and bear another cost.

Commenter 213 : Helmut Lutze – 03/02/2010

Comment # 213

ich erhebe hiermit Einspruch gegen die Herausgabe der EASA (P)AD 10-010. Die EASA (P)AD 10-010 darf nicht geltendes Recht werden.

Begründung:

- Die PAD lässt keinen technischen Hintergrund erkennen sondern beschreibt nur eurokratische formalistische Floskeln und ist deshalb abzulehnen.
- die PAD bezieht sich ausschließlich auf administrative Fehler ohne Bezug auf technische oder sicherheitstechnische Erkenntnisse.
- In Deutschland wurde nach geltendem Recht die Wartung durchgeführt, so dass alle nach diesem Recht ausgeführten Gurte nicht beanstandet werden dürfen.
- Es ist davon auszugehen dass die EASA nicht über fachliche, technische Kompetenz verfügt, sondern ausschließlich laienhaft, eurokratisch arbeitet.

Ich bitte um Bestätigung des Eingangs der Eingabe.

Commenter 214 : Marco Cappelletti, Italy – Antonio Soffici, Italy – Furio Volpi 03/02/2010

Comment # 214

I express my disapproval and annoyance referring to the PAD N.° 10-010. It's a nonsense that owing to a bureaucratic reason and not for a real technical problem I have to put on ground my glider and bear another cost.

Commenter 215 : Claudio Colella, Italy – 03/02/2010

Comment # 215

I would like to express my disapproval regarding the subject PAD. It seems only a bureaucratic reason and not a technical issue. It's strange that companies that have overhauled seat belts for years owing NAA and EASA approval now cannot do this and also, belts released with Form One (issued under the EASA approval) are now not more airworthy. If this case is true I see also an NAA/EASA responsibility and the relevant cost cannot be sustained by the user.

Commenter 216 : Volker Naumann – 03/02/2010

Comment # 216

ich erhebe hiermit Einspruch gegen die Herausgabe der EASA (P)AD 10-010. Die EASA (P)AD 10-010 darf nicht geltendes Recht werden.

Begründungen:

- Die PAD bezieht sich ausschließlich auf administrative Fehler ohne Bezug auf technische oder sicherheitstechnische Erkenntnisse.
- In Deutschland wurde nach geltendem Recht die Wartung durchgeführt, so dass alle nach diesem Recht ausgeführten Gurte nicht beanstandet werden dürfen.
- Es existieren keine fundierten Erkenntnisse zu dem Auffinden sicherheitsrelevanter Mängel an den im Einsatz befindlichen Gurten, sodass die PAD zu keinem Gewinn an Sicherheit führen wird. Stattdessen würde Aufwand ohne tatsächlichen Nutzen sinnlos weiter in die Höhe getrieben werden.

Ich bitte um Bestätigung des Eingangs der Eingabe.

Commenter 217 : Paolo Cavosi, Italy – 03/02/2010

Comment # 217

I totally disapprove the proposal PAD 10-010 because it creates additional bureaucratic burden on a recreational activity without creating any additional benefit.
Paolo Cavosi

Commenter 218 : Marco Fantoni, Italy – 03/02/2010

Comment # 218

I express my disagreement about this PAD since this is only a bureaucratic question that has absolutely nothing to do with the safety of flight. I think that it is absurd to remove and overhaul all affected safety belts only for this very marginal question, not directly related to real or presumed technical problems. If this PAD will be confirmed as AD, the entire european general aviation will be damaged without the existence of a real safety problem.

Commenter 219 : Diego Volpi, Italy – Alberto Fattori, Italy – Gianni Spreafico, Italy - Giuseppe Pasett, Italy 04/02/2010

Comment # 219

EASA it's becoming a nightmare for general aviation, sport pilots and maintenance companies. In the history of aviation never the attention of technicians and pilots was deviated that much from planes to bureaucratic issue as from the day EASA came into force!

It's difficult to sustain that a company who invented, designed, produced, and maintained the same safety belts for decades (probably since before many people working for EASA was born) routinely and without any safety issue, cannot continue overhaul them because of some wrong paper. Also many of the belts involved were overhauled before this rule came in force. We certainly have to obey to rules but it looks to me the final load of this AD will be on the shoulders of private pilot/owner who didn't do anything wrong. So it is addressed to the wrong side.

If this AD will come in to force about 3000 between GA power plane and gliders in Italy will be grounded at the end. It will be hard for the manufacturers companies to release that much belts in 6 months.

All this for what ??? change the sticker on the belts ?? or may be a new "form one" ?? Nobody can see a technical reason involved in this PAD: So please step-back and fix the problem directly with companies and national aviation authorities who were supposed to keep a sharp look.

In general, talking about all the procedures overloading maintenance organizations since few years, I think there was a giant step back in safety because of lack of physical attention to planes.

In fact while for a big organization it's easier (but still expensive) to comply to all bureaucratic requirements, for a small company the only system to survive is to shear mechanics between workshop and office to fill tons of non sense papers. European rules harmonisation can be a great achievement, but not at this price. Please think about and live people working without stress. For all this reason I fill to strongly and firmly reject this PAD.

Commenter 220 : MARUELLI SAS, Stefano Maruelli – 04/02/2010

Comment # 220

I express my disapproval and annoyance referring to the PAD N.° 10-010. This is not just a bureaucratic error: it will show to the world how Easa do not understand, at all, it's important safety roll.

Pls before stop at the ground thousand of airplanes/glider think on how late you are on discover "the problem", and how many accident you miss to prevent. If it's zero, pls you are wasting your and our time with bureaucratic sheets.

Pls spend your time to reduce the rule so we can have more, and more safe, pilots! Or simply stop losing pilots.

Commenter 221 : Bassalti Stefano, Italy – 04/02/2010**Comment # 221**

I express my strong disapproval and annoyance referring to the PAD N.° 10-010. It's a nonsense due to bureaucratic reasons and not for real technical problems. I am afraid to put on ground my glider and bear new unjustified costs. I will however check if the application of PAD N.° 10-010 can be considered legal or not.

Commenter 222 : Hans Peukert – 04/02/2010**Comment # 222**

I reject this proposal as this does NOT improve flight safety at all. See additional Comments by Deutsche Aeroclub.
[Ed. Attachment; covering same as Comment 85 above].

Commenter 223 : Germania Fluggesellschaft mbH, Peter Kappelmayer – 04/02/2010**Comment # 223**

herewith, I would like to provide the comment from Germania Fluggesellschaft mbH (Germania) which is an EASA approved airline based in Berlin with 15 Boeing 737-300/-700 in operation and 8 Fokker F100 in storage.

Germania Fluggesellschaft mbH is full affected by subject PAD.

Since many years we are sending our safety belts / torso restraint systems to R & S Aircraft Services for repair and until now we have not experienced any quality problems with the renewed webs.

Germania totally disclaims the proposed AD because of the reasons as follows:

- Until today Germania has not experienced any quality or safety problems with the safety belts / torso restraint systems that were repaired by R&S Aircraft Systems and EASA have not detected a physical quality problem with the renewed belts or webs.
Therefore Germania would like to propose that EASA is investigating the possibility to allow the application of alternative test procedures for the affected repair organizations as an AMOC.
- R & S is approved by LBA on behalf of the EASA. R & S was audited by LBA without having complaints in this regards. Germania cannot accept to bear the costs which are caused by carelessness of the NAA or by different interpretations between NAA and EASA.
- To comply with the proposed requirements Germania has to replace on all Boeing 737-300/-700 and on all Fokker F100 all safety belts / torso restraint systems within 6 months after effective date of the AD. Additionally all our spare safety belts / torso restraint systems have to be replaced. The effort and the expenses are disproportional to the benefit.
- Due to the fact that several operators are affected by subject PAD the industry won't cover the demand on time. Therefore Germania cannot comply with the time limits as proposed. Germania therefore requests to increase the time limit for the replacement to 24 months.

- German operators are already disadvantaged by the national requirement (NFL II-83-99) to renew the web of the safety belts / torso restraint systems every 12 years.
Due to this national requirement Germania and other German airlines spent already outstanding time and efforts on the inspection and refurbishment, finally on the quality, of the safety belts / torso restraint systems. Against this background it can be assumed that the belts of the German operators are in a better condition compared to the european average. This AD punishes basically the German operators which have already spent time and efforts to comply with national requirement. At the end the intention of the AD is contrary to the intention of the EASA and European community in regards of equality of competition. In light of these reasons Germania herewith request EASA to withdraw the PAD or revise substantially.

Commenter 224 : Jürgen Philipp – 04/02/2010

Comment # 224

as a president of a german flying club i have to express great concern regarding the above AD on restraint systems. Our club fully supports the letters sent to you by the german and bavarian roof organisations (DAEC and LVB) on that matter.
The grounding of our aircraft (should this AD come into effect) would be for a long time period, thereby reducing pilot proficiency, which is universally considered to be the primary means to foster flight safety. By unnecessarily increasing cost, you take away the resources that pilots and clubs can spend on training. ADs like that will impair flight safety instead of improving it; your organisation would violate the objectives it was founded for.

Commenter 225 : Görges E. D. – 04/02/2010

Comment # 225

hiermit protestiere ich gegen die obige Richtlinie. Unter "Pilot und flugzeug" habe ich einen Artikel vom 22.1.2010 von Jan Brill gelesen. Ich schließe mich voll seinen Ausführungen an. Als Halter von 2 Luftfahrzeugen ist es mir nicht mehr möglich diese Kosten zugezahlen

Commenter 226 : FIVV (Federazione Italiana Volo a Vela) , Alvis Foscato – 04/02/2010

Comment # 226

It's difficult to sustain that a company who invented, designed, produced, and maintained the same safety belts for decades (probably since before many people working for EASA was born) routinely and without any safety issue, cannot continue overhaul them because of some wrong paper. Also many of the belts involved were overhauled before this rule came in force. We certainly have to obey to rules but it looks to me the final load of this AD will be on the shoulders of private

pilot/owner who didn't do anything wrong. So it is addressed to the wrong side

If this AD will come in to force about 3000 between GA power plane and gliders in Italy will be grounded at the end. It will be hard for the manufacturers companies to release that much belts in 6 months.

Infact while for a big organization it's easier (but still expensive) to comply to all bureaucratic requirements, for a small company the only system to survive is to shear mechanics between workshop and office to fill tons of non sense papers. European rules armonisation can be a great acivement , but not at this price. Please think about and live people working without stress.

For all this reason I fill to strongly and firmly reject this PAD.

Commenter 227 : Ing. Büro Jürgen Hufner, Jürgen Hufner – 04/02/2010

Comment # 227

Seit jahrzehnten fliegen wir mit Anschnallgurten in der allgemeinen Luftfahrt.

In Zeiten vor der Regulierungswut wurden die Gurt nie ausgetauscht.

Seit der Inkraftsetzung der 12 Jahresfrist wurden die Gurte regelmäßig ohne Grund erneuert obwohl diese noch mindestens die gleiche Einsatzdauer ausgehalten hätten - willkürliche Festlegung eine Bürokarten

Sie erlauben die Meinung - von technik keine Ahnung.

Mit der AD wollen Sie die gesamte allgemeine Luftfahrt in Europa lahm legen. Diese AD entbietet jeglicher technischer Grundlage und ist ggf. auf Formfehler in der Bürokratie zurückzuführen.

Bitte teilen Sie mir verbindlich als zahlender EU Staatsbürger der Ihre Gehälter mitfinanziert mit, wie Sie das Problem auf eine faire Weise unter Berücksichtigung der historischen und technischen Grundlagen lösen wollen oder bis wann Sie auf den Schwachsinn dieser AD verzichten.

Ich erwarte Ihre Antwort bis zum 8.2.2010

Commenter 228 : Reinhold Haser – 04/02/2010

Comment # 228

Am 13.01.2010 wurde oben genannte AD im Internet veröffentlicht. Diese AD ist unausgeglichen, weil es nur Gurte von einigen ausgewählten OEM / Herstellern betrifft. Sie ist auch ungerecht, weil aus ganz Europa ausschließlich nur 4 deutsche Instandhalt. Betriebe betrifft und unverhältnismäßig, weil seit über 40 Jahren die Firma Gadringer Gurte produziert und bietet deren Instandhaltungen an, ohne dabei auch nur einen einzigen Schadensfall bezügl. der Sicherheit oder eingesetzten Materialien gehabt zu haben.

Mir scheint, dass die Behörde nicht mehr weiß, was sich gehört oder sinnvoll ist. Es wird erheblich über das Ziel hinaus „geschossen“. Es ist nicht nachvollziehbar, was die AD bezwecken soll. Darüber hinaus ist bemerkenswert, dass die vorgesehene Ungültigkeitserklärung rückwirkend erfolgen soll. Das ist nicht zulässig und im vorliegenden Fall völlig unangebracht, weil die Gurte zuverlässig und sicher sind. Außerdem ist der EASA und deren Bürokraten anscheinend nicht bewusst, welche Konsequenzen die Herausgabe dieser AD für die Luftfahrt in Europa bedeutet. Ich bin Verbraucher und Nutzer solcher Gurte und bitte Sie, diese AD ersatzlos zu streichen.

Commenter 229 : Reinhold Haser – 04/02/2010**Comment # 229**

Am 13.01.2010 wurde oben genannte AD im Internet veröffentlicht. Diese AD ist unausgeglichen, weil es nur Gurte von einigen ausgewählten OEM / Herstellern betrifft. Sie ist auch ungerecht, weil aus ganz Europa ausschließlich nur 4 deutsche Instandhalt.Betriebe betrifft und unverhältnismäßig, weil seit über 40 Jahren die Firma Gadringer Gurte produziert und bietet deren Instandhaltungen an, ohne dabei auch nur einen einzigen Schadensfall bezügl. der Sicherheit oder eingesetzten Materialien gehabt zu haben. Mir scheint, dass die Behörde nicht mehr weiß, was sich gehört oder sinnvoll ist. Es wird erheblich über das Ziel hinaus „geschossen“. Es ist nicht nachvollziehbar, was die AD bezwecken soll. Darüber hinaus ist bemerkenswert, dass die vorgesehene Ungültigkeitserklärung rückwirkend erfolgen soll. Das ist nicht zulässig und im vorliegenden Fall völlig unangebracht, weil die Gurte zuverlässig und sicher sind. Außerdem ist der EASA und deren Bürokraten anscheinend nicht bewusst, welche Konsequenzen die Herausgabe dieser AD für die Luftfahrt in Europa bedeutet. Ich bin Verbraucher und Nutzer solcher Gurte und bitte Sie, diese AD ersatzlos zu streichen.

Commenter 230 : LITEFLITE Ultrasafe Solutions, John Hilsen, Denmark – 04/02/2010**Comment # 230**

Please file attached complaint [Ed. Attachment]

Regarding EASA PAD No.: 10-010, Safety Belts / Torso Restraint Systems:

I must strongly object to this PAD based on reasons for the PAD and proposed action.

The main task of the agency is to ensure safety in European aviation under acceptable provisions for the owners and operators of the aircraft used. This PAD is doing the exact opposite.

There is no record of failed belts, and there is full traceability, giving no reason for the comments in this PAD.

I must point out the following:

- The restraint systems from the mentioned German companies were released into service, with a Form One
- The companies are approved by the Authorities and have maintained the belts under this authorization for many years.
- Quality of the belts has not declined or changed. Only the rules have changed
- LBA has audited the companies without any findings.
- EASA has audited LBA without any findings.

And yet this PAD is incriminating the four companies and their authorization, and subsequently the LBA and its authorization as regulatory oversight for EASA?

It is retrospective legislation and cannot be accepted.

The proposed handling gives further reason for objection as listed below:

- This PAD will effectively ground all affected aircraft until all involved restraint systems have been identified, removed and replacement systems have been installed.
- The downtime and price for replacement serviceable parts will be extreme, leaving the owners and operators as innocent victims.

- The timeframe will further add to this problem, as the industry cannot perform a task of this magnitude without further numbers of aircraft being grounded due to required maintenance tasks delayed by this PAD
- It is impossible for the industry to produce thousand of belts within the time given for this PAD.

I see fit that LBA and EASA give time to correct the problem, instead of replacing affected restraint systems and buy new only due to paper work and changed regulations.

If the companies can prove the belts conforms to all requirements, and that materials and methods are equal to or better than that of the restraint systems from other manufacturers, it should definitely remain in service.

Proposed solution:

- Identify all restraint systems affected by this PAD within a defined period of time acceptable to the operators.
- Inspect a percentage of the belts from each of the four companies.
- If there are no significant findings release the belts back into service.

Any Proposed legislation must look forward, not backwards.

Commenter 231 : Wolfgang and Michaela Pappe – 04/02/2010

Comment # 231

referring to PAD 10-010 I strongly recommend to refrain from activating the same. Reason:

1. There are absolutely no technical proves about an improvement of the safety situation by activating PAD 10-010. According to my knowledge there's not a single failure of belts, overhauled by Schlemann, ACM, Gadringer or R+S.
2. Apparently the reason for PAD 10-010 is only a administrative struggle for competence, which doesn't improve the further trust into EASA.
3. According to my estimate there would be far over 10.000 Aircraft in Germany concerned by this AD. That would lead to a grounding of thousands of AC, lasting for month, without safetybased necessity.
4. The cost and impact of this AD on aircraft owners, is in no relation to the non existent gain in safety.

Commenter 232 : TUIfly, Sven de Vries – 05/02/2010

Comment # 232

From an airline point of view, there are several arguments against the requirements as proposed in PAD 10-010.

- We currently do not see an immediate impact regarding safety, resp. airworthiness. To our knowledge, all listed MRO service providers are certified and audited by the German LBA without any complaints. The parts have been repaired in accordance with TSO C22G requirements and certified with EASA form 1. Furthermore the certification requirement JAR25.562 (dynamic testing) has been waived according CRI A.11-04 per certification data sheet TCDS IM.A.120 for B737NG aircraft (applicable for TUIfly).
- We are wondering that only four German MRO service providers are listed in the PAD. There are many more MRO throughout Europe performing these repairs. Since AmSafe confirmed that they are the only certified MRO in Europe for their products, any other MRO not listed in the PAD must also be affected. Before any of the

affected airlines is changing to a MRO not listed in the PAD, it must be clarified by EASA, that the issue is limited to the listed MRO's. It seems, that this issue is driven by the OEM in order to protect their repair business rather than driven by specific safety issues.

- From a commercial and operational point of view, the PAD would result in significant burden to the airlines, if approved as drafted. The limits specified in the PAD is too short to get all the affected parts replaced in due time. As there are currently no alternatives available for some A/C types or seat models (e.g. Recaro 3510), prices increase and lack of availability of parts is foreseeable. The time limits per PAD are insufficient to certify an alternative belt or restraint system.

Conclusion: Obviously, this subject has not been evaluated in full detail and with all consequences. Therefore, we require EASA

- o to complete this before the PAD will be approved,
- o make sure, that the change is justified by airworthiness, resp. safety aspects and not driven commercially,
- o adjust limits in order to enable operators to comply without unreasonable financial and operational implications.

Commenter 233 : Fraunhofer IWM, Dr. Martin Dienwiebel – 05/02/2010

Comment # 233

The measure of an AD with a three-month period for grounding is way too exaggerated, since it will affect nearly every airplane. There is no information prior to actual defects or safety problems. It is a pure bureaucratic issue in which it is necessary to clarify whether the basis of the authorization issued by the LBA may be compatible with European law. Airworthiness is presently not endangered at all.

Instead I propose a new AD which leads to abolishing the German special rule of a twelve-year overhaul of all seat belts according to the original manufacturer's instructions. Installed belts, which had a valid license at the time of installation must maintain their airworthiness, of course.

Commenter 234 : Swiss Air Rescue (Rega), Martin Hirzel and Mr Reinhard Gamma, Switzerland – 05/02/2010

Comment # 234

Our helicopter fleet, consisting of 18 helicopters, is equipped with seat belts maintained by LTB Schlemann. Since the year 2003 this company is our source for maintenance and repair of the seat belts. During all these years all products were delivered according to our requirements including the necessary JAA/EASA Form 1. On all forms reference is given to the Certificate/Approval Ref. No. DE.145.0188.T heretofore we believed to have chosen an approved repair organisation.

In operation we never have observed an in-service problem resulting from a maintenance work or a repair. From this experience we assume that the work performed by LTB Schlemann was according to an acceptable and safe standard resulting in a high quality product. There are no signs for a safety concern with the work performed by LTB Schlemann.

In the PAD it is mentioned, that the work done by LTB Schlemann was not based on approved maintenance data. We therefore require EASA to approve these data, based on the LBA approval, to make all the work done by LTB Schlemann legal. In addition we ask you to put pressure on the OEMs, so that they assist in approving the repair procedures established by LTB Schlemann.

Any other solution would put a big burden on our Helicopter Emergency Medical Services (HEMS) resulting in extensive costs and probably grounding helicopters due to non availability of sufficient serviceable parts. With the PAD as it is foreseen now, we do not see an improvement of the safety at all. We ask you to seriously consider our request and review the PAD. If you have any question, we are on your disposition.

Commenter 235 : Monarch Aircraft Engineering Ltd., Ash Phillips – 05/02/2010**Comment # 235**

With regard to PAD 10-010 and dependent upon the level of detail that EASA wish operators to comply with this proposed AD, would a maintenance records check of all seat belt and torso restraint systems covering the listed organisations be an alternative means of compliance?

As the PAD stands the required actions proposed in paragraph 1 requires an inspection of the seat belt markings and torso restraint systems to determine if they have been maintained and/or repaired by any of the listed organisations. However, there are no indications of the type of markings or any referenced document/s to aid the inspector in what to physically look for.

Do any of the listed organisations actually mark any repairs carried out on the seat belt? For example, a webbing replacement. If not, operators cannot fulfil the requirements by physical inspection.

Control of the inspection within an organisation may not cover all inspections as the components are not serialised, i.e. they are consumable items (although they are repairable), therefore traceability of where each seat belt is fitted or stored is not possible in a lot of cases.

Commenter 236 : Ian Stanley – 05/02/2010**Comment # 236**

I have just read an article in Pilot und Flugzeug 2010/2 concerning seat belt maintenance and EASA_PAD_10-010.pdf.

There are a few fundamental laws that I have learned as a Professional Engineer. They are:

Only write any data in one place. Otherwise, state where the information is. (e.g. specification, drawing number and change level, textbook name, edition and date of printing, and e.g. equation number, filing system code, etc. etc.)

Always check whether the design rules, etc., used are relevant to the case, and establish new rules if necessary.

Always involve everybody in change approval (and have them sign 'agree' or, very important, 'do not agree BECAUSE')

DO NOT CHANGE THINGS THAT WORK.

Of course, change is often necessary, but should always be done with due care.

As far as I am aware, there is no problem with seat belts in service in European registered aircraft. I am sure that designs could be improved to give better protection (whereby this includes other changes to improve such things as head protection), but here I am talking about belts failing to perform as they would have when first installed in a new aircraft. I have heard about an anchorage failure in a home built aircraft, but that is another subject. (A simple proof load test would have showed the need to strengthen the design, and this would have saved that pilot's life.)

Insisting on rushing out and changing belts within a few weeks is quite likely to cause problems! When a system is working, it is normally better to change the paperwork to be consistent with what is being done than the other way around. A good example of this was in the case of a design where, as I recall it, grade 5 bolts were specified. By chance, we found out that purchasing had chosen to standardise on grade 8 for all applications, and that all development, test, acceptance, and production work had actually been done with grade 8 bolts. An immediate mandatory change was issued, specifying grade 8 bolts!

If in doubt, for most types of seat belt, load testing of the attachments and belts, stretch behaviour of the belt sash material, and appropriate materials for the sashes and stitches, should avoid any problems. (The manufacturers will know by now which materials age slowly and also do not wear quickly or damage or discolour clothing.)

I recently read a report about seat belt matters in airline applications done for the Australian authorities, and they will know who can advise on such matters (AVIATION SAFETY RESEARCH GRANT REPORT B2004/0241 Child Restraint in Australian Commercial Aircraft Tom Gibson and Kim Thai Human Impact Engineering Michael Lumley Britax Childcare Pty Ltd (Australia) February 2006).

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(I think it was one of my classmates, who was in charge of Quality Management at Britax in Adelaide for some years before his retirement, who helped me find this report.)

Elmer Ernst of the Industrial Design Council of Australia in South Australia wrote a seat belt study for the South Australian Road Traffic Board covering design requirement many years ago, and it is still pertinent. (My library number #223, I cannot advise how to obtain it because it was given to me by Elmer after we discussed some matter.) His report cites the USA Society of Automotive Engineers, Inc., as a good source of data, and this is probably still true. Much more data is now available. While I agree that good maintenance and repair is important, I do not believe that a rush overkill is wise. The correct, and tedious, procedure is to recognise competent companies.

This means establishing a practical approach to defining each seat belt application and how belts are to be serviced, repaired, or replaced. (Belt length and width, buckle and attachments types and dimensions, load-strain characteristic curves, minimum failure load, maximum and minimum service temperatures, corrosion resistance, etc.) Ideally this should come from the aircraft manufacturer, if still in business. The most important matter is to ensure that all repairers worldwide are informed about problems and how to deal with them. (As an example of how not to do it, there was a problem with air conditioning compressor fires on Vickers Viscounts. Because they occurred on the ground, neither the authorities nor the aircraft manufacturer nor the compressor manufacturer saw any need to inform other operators, whereby the cause was a revised, incorrect, assembly drawing!

About the fifth incident was in flight and caused structural failure and a disastrous crash. One airline in Australia noticed the error, but the other didn't. After this, they talked to each other about problems!)

I trust that you will recognise the need to hasten slowly, and not totally disrupt operations where no problem is visible. (There may well be some matters requiring attention, but massive groundings seems to be overkill, to say the least.)

Also, I know that there ARE some serious matters desperately calling for attention. (I have written to the Australian investigators concerning action that should reduce the incidence of takeoff overruns, which sometimes kill and in the particular case that provoked my action, cost a large amount of money. Action is long overdue.) Please look at your priorities management.

P.S. My background.

After my Engineering studies (Bachelor of Engineering, Adelaide, South Australia), My background starts with satellite launch vehicles and spacecraft (as a graduate trainee, whereby some of the trade secrets of aircraft design and development were included), then industrial robots, motor vehicle & component design and development and as the latest quality management, (All this in Australia, the UK, France and Germany.) At various times, I analysed flight test measurements (and was for a time, to my surprise, the Guru for events during first stage engine operation of a satellite launching vehicle), set up a prototype workshop and at the same time participated in product development, liaised with customers and suppliers, set up a development programme with a customer (and thereby secured the order), supervised a design group, stood in for the

production foreman when production start-up was moved forward while he was on holidays, investigated failures (having a dreadful reputation for catching the real cause), chaired change board and FMEA meetings, stood in for department heads at various times, helped an omnibus manufacturer obtain approval from the German authorities, etc. If I specialised in anything, then it was bolted connections (because they consistently caused the most disastrous failures when not designed correctly!)

On the side, I polished up my French and German.

Here in Passau I have also passed exams for apprentice supervision and a certificate in Quality and Project Management, and also as an examined Passau City Guide.

I went through flying training, as far as PPLA, General Radio Operators Certificate (German/English), and the German CVFR (Controlled Visual Flight Rules) rating, in Germany.

One of my little victories was when I told the flying club members that the Concorde tyres were too heavily built (meaning that they had overheating problems) and that a combination of thinner walled radial ply tyres, and either bigger, or more, with lower tyre inflation pressure was the logical solution. This is what Michelin did, plus using Kevlar for low weight, strength, and destruction causing small, lightweight, pieces of debris! (I have always had great respect for Michelin.) I have recently read that Michelin considered that steel wire is inappropriate at the deflections which occur in aircraft tyres and would cut their way out of the carcass. (This happens to under inflated automotive steel belted radial tyres!)

Commenter 237 : Günter Haneklaus – 05/02/2010

Comment # 237

als Halter eines D-registrierten und privat sowie geschäftlich genutzten Luftfahrzeugs verfolge ich die Diskussion um die beabsichtigte AD für Gurte in deutschen Luftfahrzeugen. Umfangreich berichtet und diskutiert wird das Vorhaben der EASA in www.pilotundflugzeug.de.

Ich begrüße jederzeit Verbesserungen, die die Sicherheit im Luftverkehr erhöhen. Dafür sind in der Regel auch Investitionen notwendig. Die in meinem Luftfahrzeug installierten Gurte wurden vor nicht allzu langer Zeit wegen Zeitablaufs durch neue Gurte der Fa. Gadringer ausgetauscht.

Ich bitte um eine für mich als EU-Bürger nachvollziehbare Erklärung,

1. weshalb die beabsichtigte AD zur Stillegung des Flugzeugs führen soll, wenn die Gurte nicht umgehend erneut mit hohem finanziellen Aufwand getauscht werden müssen,
2. welche sicherheitsrelevanten Vorfälle eine solche derartige Maßnahme erfordern und
3. warum nur deutsch zugelassene Luftfahrzeuge betroffen sind, hier fehlt die Gleichbehandlung

Für die Beantwortung bedanke ich mich bereits jetzt, auch im Namen vieler betroffener Fliegerkollegen vom Verkehrslandeplatz Osnabrück-Atterheide. Bitte senden Sie mir auch eine kurze Eingangsbestätigung.

Commenter 238 : Martin Weglehner – 06/02/2010

Comment # 238

I am as a Certified Aircraft Maintenance Engineer on gliders and motorgliders active since 1987 . Please apologize but thus a nonsense I have never experienced . What are the reason for this AD ? Who has thought up this ? There are no detailed substantiations that prove a flight safety problem. The Safety Belts have a lifetime of 12 years an will replaced. They are checked every year with the Airworthiness Review Inspection . Also they will checked before flight. Look the Pre Flight Checklist . Sorry for my unfriendly manner , but you should work on EASA `s acceptance in Aviation and not on a bad reputation.

Commenter 239 : Werner Kerzendorf – 06/02/2010

Comment # 239

Als Halter eines LuftfahrtGeräts bin ich sehr erstaunt, dass in diesem Fall nachträglich die Lufttüchtigkeit des gelieferten Gurtzeugs aberkannt wird und neues beschafft werden soll. Dazu habe ich zwei Fragen: a) Wer hat die eventuell fehlende, aber bestellte und als solche gelieferte und bezahlte, Lufttüchtigkeit letztlich verursacht? b) Sollte derjenige auch für den Schaden aufkommen? c) Will die EASA einen Verwaltungs-Gerichts-Prozess?

Commenter 240 : Hans Peukert, Thomas Wienecke – 06/02/2010

Comment # 240

No: 10-010 Equipment & Furnishings Safety Belts/Torso Restraint Systems Inspection PAD 10. I reject this proposal as this does NOT improve flight safety at all. PAD 10-010 is strictly rejected due to the following reasons: PAD No 10-010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem. The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reason for the PAD are not given.

Commenter 241 : – TU Braunschweig, Prof. Dr. Walter Stühmer for LSV-Osterode, Mr. Benjamin Deppe 07/02/2010

Comment # 241

included please find a comment by the LSV-Osterode regarding EASA PAD 10-010. these comments have been approved by the CEO of the LSV-Osterode, Mr. Benjamin Deppe, who is included via c.c. of this mail. We would appreciate a response to our comments.

Comments by the LSV-Osterode

The LSV-Osterode rejects the proposed EASA PAD No: 10—010 regarding safety belts.

EASA plans to react with this AD because some safety belts have been maintained or repaired by maintenance organisations without holding approved (E)TSO maintenance data.

However, these organisations have maintained and/or repaired such systems in the past under procedures accepted by the Luftfahrtbundesamt (LBA). Given:

- a) that the lifespan of this equipment for recreational and general aviation (GA) is, in most cases, more than 10 years,
- b) Maintenance and/or repair was conducted in many cases under valid national regulations and before the applicability of EASA directives in 2003,
- c) No failure/defect that would compromise air safety is mentioned in the AD,
- d) This AD, if accepted, would cause the grounding of many GA aircraft,
- e) Would cause an enormous economic burden on GA without any responsibility in this case, and without, in our view, an increase in safety,

we propose to reject the planned AD, at least for the GA sector.

We see this directive as an attempt to rectify an administrative issue at the expense of parties not responsible for it. If made effective, we will have to seek for ways to compensate for financial damages, which go further than just the replacement of functional safety belts, since our tow-planes and gliders will be grounded until sufficient alternative systems are available on the market. The economic damages to our Luft Sport Verein - Osterode would be significant and not justified by a non-demonstrable increase in safety.

Commenter 242 : Michael Schiffinger – 07/02/2010

Comment # 242

permettez-moi d'exprimer mes doutes concernant la consigne proposée de navigabilité PAD No. 10-010 à propos des ceintures de sécurité d'un grand nombre d'appareils en aviation générale en Allemagne. Vu comment cette consigne se présente (apparemment sans aucune fondation concrète et donc -- sit venia verbo: purement paperassière) il est dur de la concevoir autrement que comme une tracasserie contre des entreprises avec des dossiers impeccables, les associations aéronautiques et l'aviation générale en Europe; une tracasserie qui -- compte tenu des faits -- n'a aucune pertinence à la sécurité aérienne.

La sécurité aérienne ne devrait-elle être trop importante et précieuse pour être dégradée à un terrain des jeux bureaucratiques? Comme des nombreux pilotes et experts, j'espère que l'organisation qui en est chargée prend les bonnes décisions concernant cette question, dans le cas de PAD No. 10-010 ainsi que dans ses autres activités si principales pour l'avenir de l'aviation générale. Avec mes sentiments les plus respectueux,

Commenter 243 : Klaus Heege, Luxembourg – 07/02/2010

Comment # 243

I think enough has been said regarding the lack of safety relevance of this PAD (see comments by AOPA Germany, DAeC and others). Products delivered in the past in accordance with procedures approved by the (then) competent authority should not be affected by an AD unless there is a proven safety risk. However, I believe that with this PAD even more is at stake than the business of a number of maintenance organisations and a significant amount of unjustified cost for thousands of operators. It seems that EASA is testing the grounds of a grey area between the (rightful) protection of the commercial interests of TC/ETSO holders and the interest of users to have a competitive and open maintenance market. A formal requirement in current regulations is used to question a practice that has served aviation well for more than 50 years. I fully support a requirement for TC/ETSO holders' maintenance data as a basic approach to maintain airworthiness and safety throughout the system. Nevertheless, there are alternative means which can guarantee equivalent safety and, at the same time, make the whole system less bureaucratic, more efficient and competitive. Current efforts to establish general repair procedures applicable to larger groups of aircraft are pointing in the right direction and should be intensified. The mandate of the European Commission to establish simplified procedures for GA is clear in this regard. In the automobile industry the discrepancy

between the right of manufacturers to protect their intellectual property and to explore its commercial value on one side and the public interest to have competitive markets (as guaranteed by the EU treaty) on the other side has led to a lengthy legal battle. But finally the priority of consumer protection has been confirmed by requiring that independent maintenance organisations must have affordable access to maintenance and repair data of brand manufacturers. Finally, manufacturers should not forget that market penetration of their products would have been much more difficult without the possibility of a field repair by independent organisations. Abusing regulations for the sole purpose of establishing a monopoly is not in compliance with EU competition law and sooner or later they will have to grant access to repair data anyway. EASA should look beyond the narrower framework of aviation regulations and take EU competition policy into account as well before forcing affected parties to start legal proceedings or call on the European Ombudsman. If a fair price has to be paid to compensate manufacturers for their related efforts and their intellectual property rights it should be possible to negotiate deals which would still allow maintenance organisations to continue their business. Avoiding a sudden market distortion and an inappropriate burden on end users must be a priority. The time required for such negotiations should determine the timeframe for compliance if EASA still considers a PAD/AD to be the appropriate means to put pressure on repair organisations to formally comply with latest regulations. I think all stakeholders affected by this PAD shall have the right to be informed which kind of legal and/or lobbying battle is behind it. The current text of the PAD does not provide sufficient information to fully understand its background. Therefore, it does not allow an objective judgement and just fuels speculation. So far this PAD has only created strong negative emotions in particular in the GA community. What is really at stake here is EASA's reputation as a fair and independent administrator. EASA would be well advised to immediately make it clear that it does not intend to penalise thousands of aircraft operators with unjustified cost. The (apparently mostly legal) background for issuing this PAD and EASA's general policy on where to draw the line between those repair activities requiring manufacturers' data and those which can be done in accordance with general procedures needs to be better explained to those concerned. By publicly demonstrating a non-discriminatory, transparent and proactive approach to find a reasonable solution EASA could use the current (negative) publicity to show that it is serious about its EC mandate to support GA by facilitating procedures.

Commenter 244 : Kai Ketzel – 07/02/2010

Comment # 244

does above PAD also include overhauled items if they were manufactured and later overhauled by the manufacturer GADRINGER GMBH in 2003? Please inform me asap on this.

Commenter 245 : Jürgen Hüfner– 07/02/2010

Comment # 245

A: I fully stand behind the DAEC comment and I file herewith a petition against the PAD 10-010 as follows. The PAD 10-010 must be removed. From the EASA AD list due to the following argumentation. The problem of the correct documentation can not lead to the action to put all aircrafts of the

civil aviation on the ground only because the change of rules the EASA has made. There is no technical reason to keep on the PAD. Paper makes harness not safer nor is it holding passengers and Pilots in the seat. The production procedures and practices are performed for decades and no failures occurred due to the applied procedures material and functions.

This PAD is the stupiest thing I have read in my aviation live.

1) General rejection of the PAD 10-010.

PAD 10-010 is strictly rejected by myself and I as an Manager of training and Maintenance Expert for several decades can speak for all members of the Luftsportverein LSV Degerfeld e.V. about 250 members in GA due to the following reasons: PAD No 1 OC01 0 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem.

The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e.

a malfunction of any of the mentioned safety belt systems as reason for the PAD are not given.

It seems that the EASA wants to cut down all activities in civil General Aviation as Gliding, Motorplanes, and Powered Motorgliders due to no competence in doing their work.

2) We are rejecting the PAD as an inappropriate regulation as only formal, administrative arguments are presented for the described regulation. There is no technical reason published within the document. Safety Belts and harnesses have never been broken in any case of accident due to either

material problems nor maintainace actions in the past. It also has never been the reason for any accident in the past.

The EASA is due to showing a high incompetence in knowledge about aviation in the past, technical reasons and technical background.

I'm asking to check the technical qualification of the responsible administrator and I want to know what experience this employee of the EASA has in part of harness used in aircrafis. Has the EASA have contact to the Seatbelt Manufacturere prior to publish this PAD? Has there been any meeting to do a risk analysis for that problem - or was it just decided?

3) The PAD addresses all safety belt systems maintained or repaired by the mentioned companies. EUCVO 2042/2003 came into force for aircraft under non commercial operation in Germany on the 1. of April 2009. At the earliest, this regulation was applicable on the 28. of September 2003, before that all procedures for any maintenance or repair issue were performed under effective national rule. Therefore, any safety belt system repaired or maintained under those valid regulations before that date has to be exempted from the PAD.

4) The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. The owners of aircraft affected by this PAD are faced by disadvantages without any responsibility in this case.

Comment 1:

The list of the manufacturers mentions the company "Autoflug" but the list for Type Approval holders does not. Is this correct?

Comment 2:

The life span of safety belts used in air sport is between 12 and 15 years. Accordingly the last maintenance or repair can have been up to 15 years ago. EUCVO 1702/2003 and 2042/2003 has been only in place for 6 years, for non commercial operated aircraft since april 2009. Before these dates, all maintenance or repair work was performed under national law. The AD can not be valid for any of those procedures as no European law was in force.

Comment 3:

The following comment is written from the perspective of the air sport community in Germany. The textile component of the safety belts used in sailplanes or aeroplanes was exchanged at the end of the life span by a maintenance organisation. This was a routinely performed procedure in small air sport aircraft without any observed safety risk. Due to this, it can be assumed that a major part of the aircraft used in air sport is affected by this AD. Even more, as many of these aircraft have a

livepan of several decades First estimates give the following numbers of aircraft that will be affected in Germany:

Approximately 80% of the Sailplanes and Touring Motor Glider: 8.000 aircraft

Approximately 90% of aeroplanes up to 2t MTOM: 6000 aircraft

Taking these numbers into account, about 34.000 safety belts have to be exchanged due to this AD. Costs per safety belt of about 300,C Euro would induce a total amount 10.2 Million Euro.

Comment 4:

Latest 6 months after publication of the AD (L TA) all affected safety belts have to be exchanged or the respective seats have to be inactivated. The hint shall be allowed that sailplanes have a maximum of 2 seats but the majority of those aircraft has only one. Therefore the inactivation of the only seat is no option for the owner as it is actually a grounding of the sailplane. Considering that the second seat is mainly needed for the

instructor the aforementioned is also true for the twoCseater. It is unrealistic, that the manufacturer of safety belts for sailplanes and small aeroplanes (the safety belts for those aircraft differ from those for large aircraft) are able to produce 34000 new safety belts in a time period of 6 months. Therefore, after 6 months the majority of the fleet used in air sport will be taken out of operation by this AD.

Comment 5:

Maintenance organisations as Gadringer or Schiemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by an approved procedure, accepted by an approved organisation namely the LBA. The by the AD defined unairworthiness of safety belts maintained under the circumstances described

is only justified by formal and administrative facts. Due to that the AD is in form and content not proportionate and unacceptable.

Beside that, the AD has to define possibilities to certify retrospectively the maintenance programme to avoid the exchange of all safety belts affected. The Main task of the agency and its related rules is to ensure safety in European aviation under acceptable provisions for the owner of the aircraft used. Therefore, a proposed procedure to fulfil the rules and regulations has also to be written considering the related financial urden.

Comment 6:

The maintenance organisations "Gadringer" and iLL TB Schiemann" are certified as Part 145 organisations since 2004. They release their products or maintained parts to service using an EASA "Form One". Since 2004 both companies were audited at least two times by LBA. LBA itself was audited several times. It has to be assumed, that neither LBA nor EASA performed their duties in an appropriate manner. It has to be investigated, whether LBA and EASA have to compensate the resulting financial damage. In particular it has to be stressed that the company Gadringer-Gurte was audited by EASA and LBA without any findings.

Commenter 246 : Rudolf Blust – 07/02/2010

Comment # 246

as an affected aircraft owner I want to enter an objection against above mentioned Airworthness Directive PAD No. 10-010.

The safety belts mentioned in this PAD No. 10-010 have been maintained or repaired by a company which is certified by the EASA according to PART-145.

The maintenance procedure used to recondition these safety belts is certified by the Deutsche Luftfahrt Bundesamt (LBA). Therefore the in the proposed PAD No. 10-010 affected safety belts have been maintained according to valid regulations and they are safe. Also neither problems with the affected seat belts have become known till this day nor have been any person been injured. The safety of any aircraft will not be increased by this proposed PAD No. 10-010. The intended retrospective invalidation of all, under a valid licensing executed work is absolutely unacceptable. Therefore, the intended PAD No. 10-010 is absolutely unfair, out of proportion and is unnecessary. It means for me as an aircraft owner only high additional costs and it threatens the existence of the affected companies. The intended PAD No. 10-010 should by no means come into force.

Commenter 247 : Sammy Wolfinger – 07/02/2010

Comment # 247

leider muß ich immer wieder Staunen was für ein Ignoranz in der Luftfahrt sich breit macht. Es werden nur noch 3 Arten der Luftfahrt geduldet.

1. Militär
2. Die Großen Luftfahrtunternehmen
3. Die Großkonzerne

den Rest macht man sich verzweifelt Gedanken wie man die Privatflieger zerstören kann

mit immer mehr verrückten ausreden der Sicherheit, ELT verschärfte Jahresnachprüfungen, Erfindung des Lärmschutzzeugnisses usw.

hiermit fordere ich Sie auf diesen Irrelevanten Forderungen noch mal zu überdenken.

Commenter 248 : Bernhard Huschle – 07/02/2010

Comment # 248

as an affected aircraft owner I want to enter an objection against above mentioned Airworthiness Directive PAD No. 10-010. The safety belts mentioned in this PAD No. 10-010 have been maintained or repaired by a company which is certified by the EASA according to PART-145. The maintenance procedure used to recondition these safety belts is certified by the Deutsche Luftfahrt Bundesamt (LBA). Therefore the in the proposed PAD No. 10-010 affected safety belts have been maintained according to valid regulations and they are safe. Also neither problems with the affected seat belts have become known till this day nor have been any person been injured. The safety of any aircraft will not be increased by this proposed PAD No. 10-010. The intended retrospective invalidation of all, under a valid licensing executed work is absolutely unacceptable. Therefore, the intended PAD No. 10-010 is absolutely unfair, out of proportion and is unnecessary.

It means for me as an aircraft owner only high additional costs and it threatens the existence of the affected companies. The intended PAD No. 10-010 should by no means come into force.

Commenter 249 : Berufsverband Prüfer von Luftfahrtgerät (BPvL) e.V., Thomas Becker, – 07/02/2010

Comment # 249

In der Anlage erhalten Sie die Stellungnahme des BPvL zur PAD 10-010. Der BPvL als Vertreter der Interessen der Prüfer von Luftfahrtgerät und Certifying Staff in Deutschland nimmt zur geplanten AD PAD 10-010 zum Thema Gurte wie folgt Stellung: Die geplante AD-Note und vor Allem die Begründung hierfür sind für uns nicht nachvollziehbar und werfen für uns viele Fragen auf.

Uns sind alle betroffenen Betriebe und deren Produkte bekannt. Niemals gab es Anlass für uns an der Zuverlässigkeit oder der Qualität der bearbeiteten Gurte etwas zu bemängeln. Die von Ihnen angeführten Betriebe haben seit Jahren ihre Luftrechtlichen Zulassungen, die regelmäßig bei den Behördenaudits überprüft wurden. Hätte es hier jemals die von Ihnen angeführte Beanstandung gegeben, hätte es schon früher eine Reaktion der Behörden geben müssen. Da dies nicht der Fall war, gehen wir davon aus, dass die von den Betrieben ausgestellten EASA Form One Gültigkeit haben und die Gurte lufttüchtig sind, ansonsten hätten die Behörden bei ihren Audits wohl bisher versagt.

Wir sind uns sicher, dass bei den früheren Audits entsprechende genehmigte Instandhaltungsunterlagen vorgelegt worden sind, denn dies ist in Deutschland nicht erst seit der Einführung der EASA eine Grundvoraussetzung für eine entsprechende Zulassung. Dass bei einem Audit eine aktuelle Revision zu einem Manual fehlt kommt schon einmal vor, dass aber Manuals für alle Produkte von gleich allen in Deutschland auf diesem Gebiet tätigen Firmen fehlen sollen ist unvorstellbar und mit Sicherheit auch falsch.

Wir vermuten hier eher einen übereifrigen Mitarbeiter ihrer Behörde, der die Regularien nach eigenem Gutdünken auslegt und damit renommierte Instandhaltungsbetriebe in Verruf bringt. Sie schließen von angeblich fehlenden „genehmigten“ Instandhaltungsunterlagen gleich darauf, dass die Gurte unsachgemäß instand gehalten worden sind. Dies ist eine Unterstellung, die Sie erst beweisen müssten. Zugleich stellen Sie hier ausschließlich deutsche Betriebe und deren Prüfer unter einen nicht hinnehmbaren Generalverdacht. Des Weiteren fehlt jedwede Angabe zu einem Zeitraum der hier in Frage kommen soll, oder wollen Sie mit der AD-Note die Arbeit einer ganzen Branche seit Einführung der EASA zunichte machen? Auch der wirtschaftliche Aspekt wird bei Ihrer geplanten AD vollkommen außer Acht gelassen. Nach ersten Untersuchungen etablierter Verbände können hier mehrere 10.000 Gurte betroffen sein. Ein immenser wirtschaftlicher Schaden, der lediglich auf einer Behauptung ihrer Behörde beruht. Ein weiterer Hinweis darauf, dass es sich hierbei nur um eine andere Auslegung von Vorschriften und nicht um handwerkliche Fehler handeln kann, ist die Tatsache, dass gleich alle Betriebe die in Deutschland Gurte instand halten hiervon betroffen sind. Wir erwarten von Ihnen diese AD-Note aus den angeführten Gründen nicht zu veröffentlichen.

Commenter 250 : Segelflugverein Oerlinghausen e.V., Arnd Behring – 07/02/2010
Comment # 250

I write to you on behalf of the Segelflugverein Oerlinghausen e.V. It has come to our attention that there is a Proposed Airworthiness Directive concerning safty belts and torso restraint systems (PAD No 10-010). Close inspection of all the information available to us revealed that safty belts in at least one of our gliders would be affected.

As far as we understand the reasons for issuing this proposal, the problem is a formal one. The maintenance organisations mentioned in the PAD applied procedures approved by the German Luftfahrtbundesamt (LBA) in repairing and maintaining the safety belts. In our opinion, it is not proportional to have all safety belts mentioned in the proposal to be replaced, due to an formal error. Think of for example the costs inflicted on each owner. There is no technical reason to challenge the safety of the affected products. This is especially true since the procedures applied by those organisations were in use for many years and did not yield a single case of failure related to their procedures of maintenance. If this PAD comes into effect, there will be a major number of safety belts and torso restraint system to be replaced all over Europe. Given the short term and the probable publication date of the directive, it is likely that there will be a shortage of safety belts. This effectively means that gliders featuring safety belts affected by this PAD will be grounded for most of the summer.

Therefore, we ask you not to publish this proposal as an Airworthiness Directive. Moreover, we would like to assent to the comments sent to you by the Deutscher Aero Club e.V. who reject your proposal, as well.

Commenter 251 : Jens-Gunther Jensen – 08/02/2010

Comment # 251

this PAD is beyond the pale, a form error makes good work worthless? And the consequences are not in relationship to the non existing risk.

Commenter 252 : Juergen Zoller, DRF Luftrettung – 08/02/2010

Comment # 252

Please find attached our comment to PAD 10-010. [Ed. PDF attachment] On behalf of our organisation, I address on your authority as follows. We, as most of all helicopter operators and Part-145 maintenance organisations send their safety belts to the companies listed in PAD No.1 0-010, Par. (I), for repair or overhaul. This repair stations maintain the parts according high quality standards and reasonable turnaround time. Also they have a Part-145 approval issued by the LBA and all documents delivered are in conformity with Part-145 regulations. We don't know about any safety or operational problems using such repaired belts. The consequences of a non-installation directive according PAD No.1 0-01 0 would be not only jeopardize the air rescue services we are offering to the public in Germany, Austria and Denmark, but is quite dramatic for the industry, as the original manufacturers won't be able to support all operators and maintenance organisations with replacement products in time. To our knowledge there is now safety problem, so the issue of an AD seems not justified. In the absence of any safety problem, to secure the air rescue operations and for operational and economical reasons we ask you to reassess PAD No.1 0-01 0 and to withdraw the required actions. Thank you for your appreciated assistance.

Commenter 253 : Peter Nyffeler – 08/02/2010

Comment # 253

Since my English may be not good enough I wrote my comment in German. Please let me know if an English translation is necessary.

Stellungnahme zu PAD No 10-010

ATA 25 Equipment & Furnishings - Safty Belts / Torso Restraint System - Inspection

Ich lehne dieses Proposal wegen fehlenden Nachweis eines effektiven Sicherheitsgewinnes und aus Gründen der Rechtssicherheit ab.

Begründung:

Bereits 2005 wurde mir und anderen Segelflugzeugbesitzer vom Schweizerischen "Bundesamt für Zivilluftfahrt" fachlich korrekt und mit einwandfreiem Material

ausgeführten Revision an Gurten wegen einer fehlenden Lizenz und FORM1 abgesprochen (siehe Attachment). Ich lies daraufhin meine Gurten von einem Lizenzierten Hersteller von Sicherheitsgurten revidieren.

In Ihrem Proposal Verlangen Sie, die EASA, auf Antrag von verschiedenen Herstellern, Gurten welche nicht von ihnen revidiert wurden ohne Nachweis deren Fehlerhaftigkeit zu ersetzen.

Somit wird ein EASA FORM 1 für den Endkunden rechtlich wertlos.

Denkbare Alternativen zu der zu der in PAD 10-010 vorgesehen Massnahmen.

- Verzicht auf rückwirkende Wirkung von PAD 10-010. Zumindest für nicht kommerziell eingesetzte Flugzeuge
- Die Hersteller haben ihre "Maintenance data" (ohne Kosten) zu veröffentlichen.

Womit die richtige Durchführung einer Revision nachprüfbar wird.

- Bei nicht fachgerecht revidierten Gurten Prüfung der Festigkeit und des Gurtschloss innerhalb eines Jahres durch eine EASA oder andere staatlich anerkannte Prüfstelle.

Anmerkung zu dieser PAD und allgemein:

- Bei sämtlichen mir bekannten versagen von "Torso Restaint Systems" waren nicht die Gurten selber die Schwachstelle, sondern deren Verankerung bzw. der mit ihnen ausgestatteten Sitze im Rumpf.

- Mir scheint die EASA lässt sich mit solchen Massnahmen von einigen Hersteller zur Schaffung von Monopolen missbrauchen.

Dies liesse sich vermeiden durch Erlass folgender EASA Vorschrift:

Instructions for all maintenance work required by any EASA AD has to be free available for aircraft owners and licensed maintenance organizations.

[Ed. Also in an attachment, as follows:]

Commenter 254 : Hermann Selbertinger – 08/02/2010

Comment # 254

Hallo Lorenz, anbei Einspruch gegen Pad 10 ,mit der Bitte um Weiterleitung. Hermann

[Ed. Attachment is 'EASA PAD 07.Feb.2010.odt', not recognised by our PC applications].

Commenter 255 : Westflug Aachen Luftfahrtgesellschaft mbH & Co. KG, Roland Poncette & Stephan Lindeken – 08/02/2010

Comment # 255

We would like to make a statement to your planned AD concerning seatbelts.

Our company collaborates quite a long time with Gadringer Gurte in Kassel and we have no cause for any complaints.

As a matter of fact, the quality and the workmanship of the delivered seatbelts is at all time blameless, sometimes even better then the original seatbealts provided by some airplane manufacturer.

The reaction-time for manufacturing and delivering seatbelts by Gadringer is very quick and sometimes the only possibility, since some airplane manufacturer is not

capable of deliver any seatbelts at all.

Another big issue and a great plus for us and our customers are companies like Gadringer, because the price for making some replacement is much lower, then ordering original parts at the airplane manufacturer.

We would understand and accept, if somebody made a bad job, but as we mentioned above, the quality is no issue!

If the EASA decides to authorize this AD, this could mean that you hazard the consequences of destroying jobs in general aviation in Germany.

Due to our good experiences in the past with Gadringer, we cannot understand any need for this absurd AD and we strongly protest against it!

Commenter 256 : Dan Flyconsult, Banja for KELD POULSEN, Chairman , The Association of Danish Aircraft-related Companies – 08/02/2010

Comment # 256

Thank you for the opportunity to comment on the PAD 10-010 about Safety Belts / Torso Restraint Systems. The Association of Danish Aircraft-related Companies (ADF) can not accept the PAD 10-010. Please find ADF comments and proposal in the enclosed attachment.

[Ed. Attachment as follow:] The Association of Danish Aircraft-related Companies (ADF) strongly object to this PAD based on the reasons for the PAD and the proposed action. This PAD can not be accepted.

ADF sees the following reasons:

- There is no record of failed belts and no visible prove of a safety or technical related problem.
- There is full traceability.
- The PAD is merely addressing an administrative problem.
- Safety best systems are released with a Form One.
- The companies are approved by the Authorities and have maintained the safety belt systems under this authorization for many years.
- The quality of the safety belt systems has not declined or changed. The rules have changed.
- It is ADF judgment that the PAD constitutes a retrospective law, which can not be accepted.
- The context is incomplete.
- The present lifetime of the safety belt systems must be maintained.
- The main task of the Agency is to ensure safety in European aviation under acceptable provisions for the owners and operators of the aircraft used. This PAD is doing the exact opposite.

Based on the above reasons the PAD must be changed.

- There is no reason to have the last sentence (“and to replace the affected safety belts and torso restraint systems with serviceable parts.”) in 4th paragraph of the Reason chapter.
- Proposal for a new Paragraph (2) in the section of Required Action(s) and Compliance Time(s):
 “If the safety belts and torso restraint systems have been maintained or repaired by one of the organisations mentioned in paragraph (1), the next required repair or

maintenance must be carried out by an EASA approved facility, and needed replacement must only be done with serviceable parts.”

Commenter 257 : BAE SYSTEMS SCHROTH Safety Products GmbH, Stefan Willeke – 08/02/2010

Comment # 257

aufgrund des PAD 10-010 werden wir täglich häufig kontaktiert mit der Bitte um Kommentar/ Stellungnahme zu diesem Thema. Um zukünftig diesbezüglich etwas weniger an Anfrage zu bekommen, beabsichtigen wir auf unserer Internetseite eine Information einblenden zu lassen. Aus diesem Grund bitten wir Sie darum uns ein Vorgabe zu geben welche wir auf unserer Seite Veröffentlichen dürfen. Über eine schnelle Rückmeldung freuen wir uns und verbleiben.

Commenter 258 : Zimex Aviation Ltd., Switzerland, Markus Mollet, for George Wiesner and Brad Ainscough – 08/02/2010

Comment # 258

Please find attached out feedback to your PAD. [Ed. PDF attachment as follows] To whom it may concern In the 40 years of our operation we never had a situation of Seat Belt failure which would impose a safety risk. We presently have an overhaul life on all seatbelts within our fleet of 10 years and we also perform annual check with regards to seatbelt wear, security and overall condition. We would like you to ask you to reassess your proposal as we have very good experience on the reliability on theSeat Belts overhauled or reworked by L TB Schiemann. This EASA AD as presently written would cause serious financial Implication on our fleet of Aircraft without a visible safety issue cause.

Zimex Aviation Ltd. WOULD, the case being, ask that paragraph 2 be rewritten with regards to the time frame mentioned on replacing the seatbelts within a 3 month time frame. As not enough Suppliers could actually provide new seatbelts in a reasonable time frame to avoid grounding of our aircraft.

Commenter 259 : Representative of the European sailplane manufacturers, Verband Deutscher Segelflugzeughersteller e.V. German Sailplanes Manufacturer Association & European Gliders Manufacturer association, Werner Scholz – 08/02/2010

Comment # 259

please find enclosed the comments from the European Sailplane Manufacturers upon the Proposed AD 10-010 regarding saftey belts & torso restraint systems. Subject: PAD 10-010 Safety Belts / Torso Restraint Systems. The sailplane manufacturers received the PAD and were asked for comments about 10 days ago. The enclosed letter summarizes their responses.

The European sailplane manufacturers oppose the PAD and would not support that this proposal will become a valid AD for the reasons stated in the enclosed letter.

As this topic was discussed also with the sporting associations within Europe I send this letter CC also to members of Europe Air Sports and the European Gliding Association and of course to the presidents of the glider manufacturers associations in Europe. [PDF attachment as follows]

The European sailplane manufacturers have the following comments regarding the Proposed AD regarding Safety Belts / Torso Restraint Systems as described in the PAD 10-010:

The European sailplane manufacturers oppose PAD 10-010 and do not support the measures described within the PAD. The manufacturers understand that an AD should handle cases where the actual safety of an aeronautical product is impaired.

On the other side an AD should not be used for cases where only administrative or legal aspects have to be corrected.

The PAD 10-010 states that

“Improper maintenance or repair of safety belts and torso restraint systems could result in failure of the said systems, which might jeopardize the occupant safety during turbulence or emergency landing conditions.”

but does not indicate that such improper maintenance has been conducted (beside the stated administrative shortcomings) on the listed type of safety belts / torso restraint systems.

Quite contrary according to the information of the manufacturers the type of maintenance conducted on said products has been approved by national aviation authorities (namely the LBA) in regard to the technical tasks performed and the privileges of the involved Part-145 organisations.

The regarding maintenance tasks (i.e. typically this is replacement of the textile components of such safety belts after the original components have reached the maximum service life) have been developed and executed with the main priority to show the same level of safety as of the original safety belts – this has been approved by said national authorities.

If therefore information would exist that the said safety belts & torso restraint systems show technical deficiencies then an AD would be justified. This seems not to be the case.

Another aspect which is not acceptable for the manufacturers is the scope of affected products.

Safety belts in sailplanes have a typical service life of 12 to 15 years and therefore this AD would even affect safety belts which have been maintained by said organisations before EASA was created.

This seems to be completely out of proportion and legally questionable.

As long as the only “wrongdoing” is a conflict between a paragraph in Part-145 and existing national approval by a national aviation authority (and no real safety danger is existing) it can not be justified that events occurring before introduction of Part-145 need to be corrected.

The most critical aspect of this AD will be the resulting image of EASA within the General Aviation community in Europe.

Already several changes due to European regulations imposed after creation of EASA are bitterly discussed within the recreational and sport aviation community. Very often “EASA” is been associated with increased bureaucracy, with higher costs, with increased processing times of certification tasks and with regulations nobody asked for and which seem to be tailor made for commercial air transport but not for General Aviation.

If such an AD would be put into force which obviously is not aimed at improving safety but only at correcting a discrepancy between approved processes and existing regulation then EASA would even lose the still existing reputation that it is there to improve safety in aviation.

The manufacturers see with deep concern this change of reputation of EASA and are even more concerned with the associated damage to the trust of the operators that regulation and the authorities are there to protect them.

If the end result would be an increasing willingness of the operators to “bend those useless rules” this would create more safety hazards then the correction of a merely administrative and/or legal discrepancy.

Therefore the European Sailplane Manufacturers oppose PAD 10-010 and propose that this PAD will not become a valid AD.

In summary the reasons are:

1. No existing safety problem is been corrected but only a administrative / legal discrepancy.
2. Approval by involved aviation authorities regarding said maintenance tasks did exist and no indication of an existing problem was given by aviation authorities before publication of the PAD 10-010.
3. Retroactive action (i.e. mandatory replacement of safety belts) would include products which were maintained before creation of EASA at a time when stated regulation did not exist.

4. Due to the disproportionate economical impact upon the owners of affected aircraft which would need to buy new safety belts or ground their sailplane such a measure would result into a severe loss of credibility of EASA and according regulation in General Aviation. The task of EASA of improving safety is appreciated by this community but not the role of creating additional administrative and economical burden!

This comment is a result of feedback given by the European sailplane manufacturers and several maintenance organisations working within the glider community.

Commenter 260 : FSV Cumulus Uelzen e.V. , Carsten Brandt – 08/02/2010

Comment # 260

I am Head of Training of the FSV Cumulus Uelzen e.V. and represent the owners and pilots of 30 aircraft of the General Aviation including gliders.

We received the mentioned document and would like to comment on the proposal:

For the last 50 years we always met the requirements of due maintenance work and the exchange of parts due to expired life-time.

In most cases, especially concerning seat-belts and other synthetic-based, safety-relevant parts there is at least an imaginable reason for the requirements, e. g. ageing because of uv-radiation from plain sunlight. In this case, as I understand, there has been absolutely no actual risk and the PAD is based on formal inadequacies.

We do not think that the proposed action is necessary because it will result in grounding all our aircrafts (they have been bought, refurbished and repaired by Schlemann LTB for decades) without the slightest practical danger. It will take a lot of time until parts can be purchased for our and all other aircraft in Europe.

This is unacceptable.

It actually could lead to lack of practise of our pilots (they mostly do not have other possibilities for training). This is a much greater danger to the safety of air traffic than shortcomings in documentation without evidence of actual quality deficiencies.

Furthermore we see some formal problems:

- In the General Aviation the EASA-rules (VO (EG) 2042/2003) apply only since 01.04.2009. This means that all aircraft have been correctly maintained under national laws and regulations. European rules can logically not be used for acts completed before their existence.

- We would like to have noted that Schlemann LTB and the other concerned companies must have been audited by German LBA and the LBA by EASA since EASA rules apply. If since 2004 no mistake in the documentation was found, we ask ourselves if EASA or LBA fulfilled their duties correctly. If not, the authorities mentioned might be liable if our aircraft can not be used because of this.

Commenter 261 : DMT Gründungstechnik GmbH, Dipl.-Ing. Dieter Schau – 08/02/2010

Comment # 261

Protest and contradiction against PAD10-010. There is no indication at all that a safety issue exists. My Safety Belts were maintained under authorisation of the German Luftfahrtbundesamt and EASA responsibility.

Commenter 262 : Johannes Reiser – 08/02/2010**Comment # 262**

I do not agree with Your intension to introduce the new regulation PAD No. : 10-010 until 10 th. Feb. 2010. I agree with the comments of “Deutscher Aero Club” that the EASA PAD 10-010 is not practicable !!! Therefore I strongly recommend that the PAD will be withdrawn by EASA immediately

Commenter 263 : Malter Air Service, Uwe Malter – 08/02/2010**Comment # 263**

PAD10-0010 is strictly rejected by K. Malter Air Service due to the following reasons:

An AD should be issued to address technical or safety related problems. In this case i. e. an understrength belt material or lacing, premature failure if the belt material etc. EASA had to proof that such a condition exists. In the PAD EASA did not mention any safety issue to support their statement. If EASA can not find examples to support that the belts are unairworthy, the PAD should be rejected.

EC regulation 145.45 b explaines : “(b) For the purposes of this Part, applicable maintenance data shall be any of the following:...”. Here the statement of the PAD is not true, it states “145.45 requires that (E) TSO approved parts and appliances can be maintained or repaired only if approved maintenance data provided by the (E)TSO approval holder is used,...”. It does require “ANY of...” which says clearly there are more than one possibility. 145.45 b 4 gives one example in stating: “4. Any applicable standard, such as but not limited to, maintenance standard practices recognised by the Agency as a good standard for maintenance;”, another example can be found under 145.45 b 5. The statement in the PAD is wrong, therefore the PAD should be rejected. The explanation of the reason for issuing the PAD is administrative. Administrative problems between EASA, LBA and the maintenance facilities should be solved elsewhere, but not in the form of an AD. These belts are repaired under an approved repair sheme in a Part 145 certified maintenance organisation under the supervision of the LBA. If the repair sheme is not in line with EASA rules, these condition has to be solved. Nevertheless it was approved under national rules and the belts are delivered with a valid Form 1. For airplanes under national rules (Annex II) and repaired belts before the european law was in force (for non comercial operated aircraft in Germany the 01.04.09) the PAD could not be valid, as national law was or is still in force and the procedures were in compliance with these rules.

Commenter 264 : Kathrin and Rolf Susenburger – 08/02/2010**Comment # 264**

Comment on EASA PAD 10-010. With some concern we have read the proposed AD (PAD) 10-010 of EASA relating to the repair of seat belts. Even though under the administrative point of view the AD may be justified, it is not justifiable under the technical and safety aspect.

1. The implementation of the AD will not increase the actual level of aviation safety, as up to now there has been no case in which seat belts repaired by one of the

aeronautical workshops listed under no. (1) of the para "Required Action(s) and Compliance Time(s)" of the PAD have failed.

2. The implementation of the AD will be very cost intensive for aircraft operators without increasing safety.

3. Many aeroplanes will be grounded in the course of the year as it will be impossible to have such a huge number of new belts produced within a period of a maximum of 6 months.

We do hope that EASA will find a more moderate way, at least by "grandfathering" those aircraft owners/operators who installed such repaired seat belts at a time, when national legislation was applicable, and not forcing them to remove almost new seat belts from their aircraft.

Commenter 265 : Ralf Riethmüller – 08/02/2010

Comment # 265

nach 20 Jahren Tätigkeit als verantwortlicher Technischer Leiter kann ich mich nur wundern über die Herausgabe einer solchen (P)AD . Über die reduzierte Festigkeit der Metallbeschläge wurde nie diskutiert sondern Immer nur über den Textilgurt. Sowohl Gadringer , Schleemann und die anderen 2 Zugelassenen LTB tauschen die Gurte gegen einen zugelassenen Gurt aus. Da spricht absolut nichts dagegen! Bitte ziehen Sie diese (P)AD No.10-010 schnellst möglich zurück.

Commenter 266 : Marcus Abels– 08/02/2010

Comment # 266

find attached my comment to the proposed AD. An administrative mistake within an maintenance approval will cause a world wide replacement of safety belts and restraint systems without any incidents related to the maintenance work. The affected companies had work for several years under responsibility of the LBA without any doubts. Incomprehensible is why maintenance work performed over years and before establishment of the EASA under responsibility of national airworthiness authorities (i.e. LBA) according to Joint Aviation Regulations (JAR) can be withdrawn without any consideration. Administrative mistakes have to be corrected according to legal regulations but if no direct link to safety issues can be demonstrated the consequences shall not interfere as much as necessary the normal operation of an aircraft and its owner/operator in terms of costs and availability. Therefore the period of time to inspect and maybe replace the affected safety belts or restraint systems has to be re-considered. In case of damages an immediate replacement is comprehensible. In any other case related to paper work belonging to an maintenance approval of an organisation this AD is not in line with a sustainability and growth of airports in europe, due to high costs and unavailability of aircrafts for clubs and sportsmen. Summing up I defeat the proposed AD because all airports enthusiasts affected by that AD will be penalised for failures made by organisation out of there scope. Hence I propose to reject the PAD because no differentiation for parts approved in advance to EASA foundation had been done.

Commenter 267 : LTB Schlemann GmbH, Dieter Schlemann – 08/02/2010

Comment # 267

wir, die Firma LTB Schlemann GmbH lehnen die EASA PAD 10-010-1-1 strikt ab und fordern die sofortige Rcknahme.

Wir bestehen darauf, dass ausgelieferte Gurte die bei uns oder einen der benannten Betriebe berholt oder repariert wurden und mit einer EASA FORM ONE ausgeliefert wurden ihre Luftchtigkeit beibehalten.

Ob wir aktuell ber genehmigte Instandhaltungsunterlagen (approved maintenance data) verfgen wissen Sie nicht. Sie haben aktuell von uns keine angefordert und auch nicht nachgefragt. Dementsprechend ist Ihre Begrndung unrichtig, nicht belegt und entspricht nicht der Wahrheit.

Wir besitzen eine gltige EASA-Zulassung und eine gltige Verfahrensweisung fr die Instandsetzung von Flugzeuganschnallgurten, und alle von uns reparierten oder berholten Gurte haben eine gltige JAA oder EASA FORM ONE. Sie knnen uns auch nicht irgend eine Verfehlung vorwerfen. Auch gab und gibt es keine Beanstandungen. Ihre Behauptungen die von uns berholten Gurte wren unsicher ist falsch. Von einer unsachgemfen Instandsetzung kann auch keine Rede sein. Solche Behauptungen mssen Sie durch einen unabhngigen Sachverstndigen belegen knnen. Beim Einbau und bei den jhrlichen Nachprfungen in und an den Flugzeugen wurden auch keine Fehler festgestellt.

Kein Gurt wird versagen.

Die von uns verwendeten Gurtbnder fr stationre Gurte haben je nach Type eine Bruchlast von 2500 bis 3000 kg, Schulterrollgurte je nach Type von 2000 bis 3000 kg. Die von uns verwendete Naht hat eine Bruchlast von ca. 2200 kg.

Itere Gurte sind ausgelegt fr 1500 LBS (ca.680 kg). Neue Gurte nach TSO C-22 g, die sogenannten 16g Gurte, sind ausgelegt fr 3000 LBS (1362 kg). Unsere Werte liegen also weit darber.

Nach Selbstauskunft der Hersteller hat keiner der Hersteller sich bei Ihnen beschwert oder eine Anzeige erstattet.

Falls Sie eine entsprechende AD herausgeben, leiten wir gegen die AD rechtliche Schritte ein, da Sie mit dieser PAD und AD gegen geltendes EU-Recht verstoen. Wir werden Schadensersatz fordern.

Als Instandhaltungsbetriebe sind nur 4 deutsche Betriebe betroffen. Alle anderen Betriebe in Europa (ca 8-10) sind nicht betroffen?

Das ist nach unserer Auffassung mindestens eine Diskriminierung, Behinderung und Schdigung, weil auch die anderen nicht benannten Betriebe nicht ber Hersteller-Instandhaltungsunterlagen verfgen. Das ist ein Versto gegen EU-Recht.

Ein Kunde in der Nhe der niederlndischen Grenze wrde nach einer AD 5 Kilometer ber die Grenze fahren, denn dort drfen die Gurte ohne Hersteller-Instandhaltungsunterlagen dann gemacht werden. Dementsprechend haben wir das gleiche Recht.

Fr den Fall, dass Sie unsere bisher genehmigte Verfahrensweisung zur Gurtinstandsetzung ablehnen, fordern wir eine Herstellerunabhngig LBA/EASA-genehmigte Verfahrensweisung (Reparaturanweisung) als Ausnahmeregelung nach EG 216/2008.

Vergleichbar mit dem Verfahren in den USA. Dieses wurde uns vom LBA bereits mehrfach in Aussicht gestellt. Alle US-Gurtreparatur-stationen verfgen auch nicht ber Herstelleranweisungen und arbeiten mit einem FAA-geprften Manual. Von diesen US-Firmen hat auch mindestens eine der Firmen eine EASA-Zulassung. Das,was die EASA US-Firmen genehmigt,erwarten wir auch fr uns. Das knnen wir verlangen.

Commenter 268 : LSG Fallersleben, Dr. Helge Liebertz – 08/02/2010

Comment # 268

1. safetybelts on gliders and motorgliders are not limited by the strength of the belts. They are limited by the airframe structure.
 2. Never heard about a case of a torn seatbelt as a reason for an accident. There is no technical reason for a change.
 3. The national law was allowing maintenance by approved companies as certified and autited by LBA.
 4. Valid Form 1 before EASA law can't be rejected.
 5. To replace all belts mentioned by this AD half of german gliding fleet would be grounded for month.
- For our Club all 15 gliders based are affected

Commenter 269 : On behalf SGN, Thomas Friedli – 08/02/2010**Comment # 269**

Segelfluggruppe Nidwalden (SGN) owns and operates 10 aircraft under Swiss registration. These aircraft contain 17 safety belt systems which might be affected by this PAD. SGN strictly rejects PAD No. 10-010 because of the following reasons:

1. "Unsafe conditions" which require the issue of an AD need to be substantiated by a risk analysis. This analysis need to show that the failure hazard and probability are in a critical relation ship (above certain hazard risk index). The actual failure hazard in PAD No. 10-010 is understood to be hazardous or catastrophic. However, the failure probability considered seems to be tremendously overestimated. This is based on the fact of the long lasting (up to 40 years) actual good experience with the affected products. It is questioned if the products from the OEM show lower actual failure rates.
2. The PAD actually addresses the approval process of maintenance facilities under EASA control. To our knowledge the affected maintenance facilities have been and still are EASA approved. Therefore the affected parts have been and still are approved parts. Therefore grandfather rules shall apply and no replacement shall be required.
3. The compliance time will result in unacceptable long grounding time of the affected aircraft because of the magnitude of logistics aspects for the replacement in the entire EASA community.
4. Note: Due to the fact that the affected parts have been EASA approved parts it is expected that EASA will provide cost compensation to aircraft operators if the (P)AD should be released.

Commenter 270 : Jens Reen and Sven Reen, 08/02/2010 - Carolin Eisenbrecher 08/02/2010**Comment # 270**

referring to EASA (P)AD 10-010 i highly recommend not to implement this or a similar ruling, as i consider it unfair and unjust.

More than that: It is completely ridiculous, as the financial and factual consequences would be unreasonable far-ranging.

I myself, as a private pilot and glider owner, use valid and safe seatbelts. Substantiated by the familiar argumentation of the german DAeC i do not see a reason for nullifying the (paper)work of the manufacturers, sellers, maintenance firms or/ and the federal aviation office of Germany (LBA). There is no leak of safety at all. I would not accept a directive like (P)AD 10-010.

Commenter 271 : Motorfliegerclub Rosenheim e.V., Dr. Hermann Jacobs – 08/02/2010**Comment # 271**

As the President of the Motorfliegerclub Rosenheim e.V. (Flying Club Rosenheim) in Germany I take objection to the proposed AD 10-010 (PAD 10-010) concerning Safety Belts. PAD No 10-010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem. I reject the PAD as an inappropriate regulation as only formal arguments are presented for the description of the regulation. There is no technical reason

given in the documentation. The inspection and possible replacement of safety belts for the light aircraft fleet of our Flying Club would induce undue costs that I am not ready to bear in light of the lack of reason as mentioned above. I therefore strongly request that this PAD is not set into effect and that it is withdrawn from any list of PADs.

Commenter 272 : Luftsportverein Gronau e.V., Günther Oppermann – 08/02/2010

Comment # 272

zu der von Ihnen mit Datum vom 13.01.2010 veröffentlichten PAD nehme ich im Namen des Luftsportvereins Gronau e.V. im Folgenden Stellung. Ich bin der Schriftführer des o.a. Traditionsvereins, dessen Gründung auf das Jahr 1932 (also nicht zur Nazizeit) zurückgeht. Im Jahre 1954 erfolgte die "Wiedergeburt" des Vereins, nachdem die durch die Folgen des 2. Weltkrieges (sicher berechtigten) Einschränkungen in der Ausübung des Luftsportes aufgehoben worden waren. Danach hatte der Verein, auch im Sinne einer gemeinnützigen Förderung der Breitensports, einen bemerkenswerten Aufschwung erreicht. Leider ist der LSV Gronau, wie auch viele andere Luftsportvereine, von einer tiefgreifenden Krise betroffen. Kosten und sonstige Restriktionen führen zu einer unerträglichen Belastung. Soviel zu der Geschichte und dem gegenwärtigen Stand des LSV Gronau/Leine e.V. Aber nun zum Detail. Im Jahre 2009 hat der LSV Gronau, im Zuge der luftrechtlich vorgeschriebenen Terminsetzungen, die Anschnallgurte an dem Segelflugzeugdoppelsitzer G 109 Twin II, Eintragszeichen "D-8752", austauschen müssen (über die Sinnhaftigkeit dieser Maßnahme möchte ich als geprüfter Fallschirmwart an dieser Stelle gar nicht diskutieren !!!!!). Nun wird uns über Ihre PAD mitgeteilt, das diese Instandsetzungsmaßnahme infolge des "Fehlens von Wartungsunterlagen" wirkungslos sein soll???? Nur zum Verständnis: Ich bin Polizeibeamter, sehr wohl im Umgang mit Rechtsvorschriften vertraut. In diesem Sinne mag ich vielleicht ein wenig mehr Verständnis für Ihr Vorgehen aufbringen, als dies bei meinen Vereinskameraden der Fall ist. Fakt ist: Ich muss mich bei meiner Berufsausübung jeden Tag der Lebensrealität stellen. Davon sind Sie weit entfernt !!!!! Zur Umsetzung Ihrer PAD: WIR HABEN KEIN SICHERHEITSPROBLEM !!! Wir haben ein Problem in der Umsetzung der PAD, wie vorstehend beschrieben. Inhaltlich beziehe mich völlig auf die Stellungnahme des DAeC, der sehr eindeutig auf die Situation tatsächlicher Sicherheitsrisiken und andererseits deren administrativer Behandlung hingewiesen hat. Es ist tatsächlich so (und da sollten Sie einmal versuchen, mich umzustimmen !!!!!), das die in deutschen Luftfahrzeugen eingebauten Anschnallgurte nach allen technischen und wissenschaftlichen Erkenntnissen absolut sicher (luftfahrttauglich) sind. Alles andere ist bürokratischer, administrativer BLÖDSINN !!! Ich bitte Sie deswegen nachdrücklich, die o.a. PAD sowie alle Folgemaßnahmen nicht umzusetzen. In der Hoffnung, für unseren Luftsport nicht völlig unerfolgreich gehandelt zu haben verbleibe ich

Commenter 273 : Motorfluggruppe Pilatus, C/o Pilatus Aircraft Ltd, Hermann Spring – 08/02/2010

Comment # 273

General

First of all many thanks that you provide us the opportunity to raise our concerns prior the proposed AD is already published. However our concerns are not limited to the PAD 10-010, which we strictly reject.

There is nothing to fix in the field with the aircrafts safety belts, but there is a serious problem within the EASA, that such an issue could result in this proposed AD. This issue **MUST** be fixed at the root!

PAD 10-010 Technical

An AD should never be considered, if no serious safety issues are reported from the field. To our knowledge, there are no safety issues with seat harnesses addressed by the PAD 10-010.

It seems that certain areas within EASA do not understand General Aviation maintenance, especially not the lower end with the average age of ~ 30 years old aircraft, and with very generic Maintenance Manuals.

To maintain these aircrafts must be room for interpretation and also the use of general practice must be much more supported. Various Aircraft Maintenance Manuals are referring to AC 43.13.xxxx. If EASA support to use these AMM, it supports indirectly the AC 43.13.xxxx.

PAD 10-010 Procedure

As no safety belts issues exist which are addressed in PAD 10-010 there is nothing to fix at the aircraft.

The problems is somewhere within EASA procedures and this must be fixed.

Fix the rules and regulations at the root, which are creating such mishaps.

I propose that all EASA Employees must go initially at least six (6) month to work in a maintenance shop with hands of the area of their activities.

A regular 4 week hands on retraining shall be at least every 4 years, if possible at different work shops.

Such an approach would be beneficial for all parties and it would establish the base ground for a today not existing dialog.

Many thanks for cancelling all activities to issue an AD like PAD 10-010.

Furthermore I thank you, that you are considering to establish a balanced dialog between EASA, the maintenance shops and the operators (regulator, provider & user). Bring them all together, not in Hotel tower, somewhere in a workshop, where real life takes place, where the cotter pins must inserted, the bolts properly installed etc, to fly safe.

Commenter 274 : Norwegian Air Ambulance, Bjørn Nergård – 09/02/2010

Comment # 274

I'm writing as a European HEMS operator and member of the European HEMS & Air Ambulance Committee (EHAC). I address myself to your authority with regard to the published PAD No. 10-010 and would like to submit our statement as follows:

Most of all helicopter operators and Part-145 maintenance organisations send their safety belts to the companies listed in PAD No. 10-010, Par. (I), for repair or overhaul. This repair stations maintain the parts according to high quality standards and reasonable time of circulation. Also they have a Part-145 approval issued by the LBA and all documents delivered are in conformity with Part-145 regulations.

We don't know about any safety or operational problems using such repaired belts. The consequences of a non-installation directive according PAD No. 10-010 would be dramatic for the industry, as the original manufacturers won't be able to support all operators and maintenance organisations with replacement products in time.

To our knowledge there is no safety problem, so the issue of an AD seems not justified.

In the absence of any safety problem, for operational and economical reasons, we ask you to reassess PAD No. 10-010 and to withdraw the required actions for the benefit of the aviation industry. Thank you for your consideration of our statement and your appreciated assistance.

Commenter 275 : Danish Aviation Association, Otto Petersen – 09/02/2010

Comment # 275

Please note our attached comments to EASA PAD No: 10-010.

Thank you for the opportunity to comment on EASA PAD No: 10-010 on Safety Belts / Torso Restraint Systems.

GENERAL: This PAD can not be accepted.

SPECIFIC: The context is incomplete, and it seems to be retrospective law. The PAD is merely addressing an administrative problem without visible prove of a safety or technical related problem. All in place safety belts systems are being inspected under present National and EASA Rules and Regulations. The present lifetime of the safety belt systems must be maintained in accordance with the existing national and EASA approved Airworthiness Directives. The PAD represents an unreasonable economical burden to operators and aircraft owners, which is in contradiction with the principle task of EASA ruling to ensuring safety under acceptable conditions for operators, the industry and aircraft owners. Future need for repair and maintenance must be carried out by EASA approved maintenance facility.

RECOMMENDATION: Delete last sentence in 4th paragraph of the Reason chapter. This sentence is “and to replace the affected safety belts and torso restraint systems with serviceable parts.”

Adjust the suggested Required Action(s) and Compliance Time(s):

- Paragraph (1) needs no change.
- Paragraph (2) to be reworded, e.g.:
 - “If the safety belts and torso restraint systems have been maintained or repaired by one of the organisations mentioned in paragraph (1), the next required repair or maintenance must be carried out by an EASA approved facility and needed replacement must only be done with serviceable parts.”
- Paragraph (3) needs no change.

Commenter 276 : European Federation Historic Aviation, Leo Haas – 09/02/2010
Comment # 276

With interest we took notice of your above mentioned AD. Please confirm, that Annex II aircraft in accordance with consideration 5 of EC Regulation 216/2008, are excluded from this AD. Thank you beforehands.

Commenter 277 : European Gliding Union, Patrick PAUWELS, President – 09/02/2010
Comment # 277

On behalf of all its subscribing National Gliding Federations, the European Gliding Union wishes to add its support to the concerns already raised by several air sport users/organisations in respect of PAD 10-010 – Equipment and Furnishings. This proposed measure would involve a significant majority of the estimated population of some 18000 sailplanes operated in Europe, not to mention an unqualified proportion of the light aircraft fleet.

The EGU finds this PAD to be a wholly inappropriate measure since only formal, administrative arguments are presented in justification of the proposed directive. There is no technical justification given within the document. It is wholly inappropriate and disproportionate to force owners to remove reconditioned harnesses unless EASA has proof of a genuine unsafe condition to warrant doing so. Further, the corrective or alleviating measures proposed are unrealistic in both cost and timescale, and

would undoubtedly result in the grounding of a very large number of aircraft pending this action.

The design requirements for sailplane harnesses are clearly specified in CS-22.785. The repair of harness webbing is a simple process involving replacement with similar specification material. The stitching, if not available in a component maintenance manual, reverts to standard practice. We are unaware of any problems experienced by aircraft owners with regard to these harnesses over many years. Gadringer Gurte GmbH, LTB Schleman and others have been maintaining/repairing safety harnesses for sailplane owners for over 40 years by procedures now approved by EASA and, before that, by national regulation, and presumably subject to airworthiness audit.

A key role of EASA is to ensure safety in European aviation under acceptable provisions for the owners and operators of the aircraft. We would expect that this entirely administrative issue should be rectified by appropriate administrative measures. Measures should be prepared considering the related financial burden in respect of the lack of evidence of any identified safety risk. If any AD is deemed necessary, it should, as a minimum, identify realistic options for retrospective adoption of a maintenance procedure to avoid the exchange of all safety belts implicated. Further, If owner action is necessary, we would recommend that a process based on an 'On Condition' type of inspection, supported by proper guidance for the manufacturer(s) might be considered.

Commenter 278 : Austrian Airlines, Erwin Fleberger – 09/02/2010

Comment # 278

With ref. to PAD 10-010 please find attached comments from Austrian Airlines inclusive supporting material for your consideration.

Please provide your response to this comments to the undersigned.

Austrian is in commercial relation with Part 145 organisation ACM (Aircraft Cabin Maintenance GmbH) for refurbishment of safety belts and restraint systems manufactured by AmSafe, Pacific Scientific and Schroth Safety Products GmbH.

We have evidence, that ACM has received approval from the German LBA to accomplish refurbishment of safety belts and restraint systems. In addition, ACM provided attached test certificates which confirmed a minimum of 5500 lbs breaking strenght of their refurbished safety belts resp. restraint systems which demonstrates that the requirements of TSO-C22f and TSOC114 are met. Consequently, no unsafe condition exists nor may exist which justifies the promulgation of an Airworthiness Directive.

The value of installed and stocked safety belts and restraint systems refurbished by ACM at Austrian is about € 2 MIO. Scrapping of all those safety belts and restraint systems would lead to an unacceptable economical damage.

Compliance to the PAD within the proposed compliance time of 6 months would lead to grounding of a large number of aircraft as the manufacturers will not be able to produce the required safety belts and restraint systems in this short time periode.

Under consideration of above mentioned arguments we propose following required action:

After the effective date of this AD do not install safety belts or torso restraint systems on any aircraft which have been maintained or serviced by the organisations

- LTB Schlemann
- Gadringer Gurte GmbH, and
- R & S Aircraft Service

after the effective date of this AD

This would enable the airlines to use their present stock and give the OEM's time for production of new install safety belts or torso restraint systems.

[Ed. As attachment a 'test report': Certificate of Conformance, 4035-1 15/16" Black Nylon Webbing, Customer 'ACM GMBH', dated 12/10/09].

Commenter 279 : Royal Netherlands Aeronautical Association (KNVvL), Bart Pelt, on behalf of Rob Klein, Secretary Technical Commission, Royal Netherlands Aeronautical Association – 09/02/2010

Comment # 279

On behalf of the Technical Commission of the Royal Netherlands Aeronautical Association

I hereby send you our comments on AD PAD 10-010 [Ed. Attachment, as follows] In reaction on the proposal to issue an Airworthiness Directive, PAD No.: 10-010, for safety belts and torso restraint systems, we can not accept an AD for some German manufacturers which have been maintaining or repairing safety belts and torso restraint systems for years. Specially when the reason for this AD is that the approved authorised (ETSO) manufacturer does not have an approved set of maintenance data to maintain or repair safety belts. We contacted some manufacturers mentioned by this AD and some of them told us that they had to get there information by the proposal AD from EASA.. The manufacturers who maintained or repaired safety belts for years, have to be given opportunity and time to consider an approved set of maintenance data to maintain and repair safety belts. More over when we understand that the German government approved maintaining and repairing of safety belts by these manufacturers for years. Some of these manufactures are (ETSO) approved by EC Regulation part 145 to produce new safety belts.

Reading these proposal AD we understand it is not directly a safety issue but more a political issue to maintain or repair by these manufacturers without approved maintenance data. The bare fact that there is no set of maintenance data available can not lead directly to the conclusion that an unsafe situation has developed when safety belts have been repaired and used for so many years.

We have confidence in the authorities to make decisions based on safety issues and not on political issues. Specially when maintaining or repair of safety belts is approved for years by the LBA. For many years we have used maintained or repaired safety belts of these companies, which are authorised by the LBA. We can not understand and accept that these safety belts are now considered unsafe and must be changed in to other, most American, safety belts.

We think that EASA must give these manufacturers a period of time to supply approved maintenance data. The safety belts which are maintained or repaired by these manufacturers and are in use in our planes are prepared under control by the German authorities. EASA must accept the these safety belts as safe belts, while these belts have been maintained or repaired in that period under control of the LBA. Beside that it is not possible to remove and replace all these safety belts in a period of three months. As a consequence many aeroplanes will be grounded.

Commenter 280 : SWISS International Air Lines Ltd. , Daniel Sollberger – 09/02/2010

Comment # 280

please find attached the Swiss enquiries letter referring to the PAD 10-010. This letter was also sent registered to: EASA, AD Section.

[Ed. Attachment] We refer to the EASA PAD 10-010 dated January 13, 2010 which we received on January 14, 2010. We also take note of the reactions of our seat belt manufacturers R&S Aircraft Services dated January 18, 2010, Aircraft Cabin Maintenance GmbH dated January 20, 2010 and of Gadringer Gurte GmbH dated January 14, 2010.

According to the above mentioned PAD some safety belts and torso restraints were maintained or repaired without the approved maintenance data. As a consequence, all the affected safety belts and torso restraints need to be inspected and replaced if necessary.

We would like to point out that we have not received any detailed assessments with regard to the lack of "approved maintenance data" and the involved risks of the alleged defective seat belts and torso restraints, and we are not aware of any other motive which would require immediate action to inspect and replace the seatbelts and torso restraints. In order to assess the alleged safety concerns and to prepare a respective replacement procedure we would be grateful to obtain further information with regard to the following:

- The manufacturers in question have been maintaining and repairing these safety belts for years or even decades without any safety-related concerns being brought

up by the authorities. Therefore we would like to know if there have been any changes in the certification standards leading to such a new assessment.

- We would like to know the detailed reasons which have led the EASA to come to the conclusion that the safety belts maintained/repared by the affected maintenance organisations create a safety concern. Is the lack of approved maintenance data as indicated by the EASA due to a lack of formal approval or rather are there concerns in the substance?

- The above mentioned companies are under regular supervision by various authorities.

Have there been any written reports from these authorities filed with the EASA?

- Have there been any safety-related issues with other operators?

An internal review of our different fleets indicates that our short and long-haul fleets would be affected by the PAD as we have 12'000 of the concerned safety belts installed in various aircraft types, such as the Airbus and Avro RJ. The requirements (replacement of affected seat belts and torso restraints with serviceable parts) within the 3 month implementation period may lead to a partial grounding of our fleet since such a large scale campaign would require extensive planning and maintenance slots, as well as an adequate supply of serviceable seat belts and torso restraints. It goes without saying that such a measure would seriously impact our overall operation.

In order to obtain a better understanding of the underlying reasons and to work out a reasonable solution including a realistic timeframe for the completion of the required actions we would like to suggest a meeting with the EASA before the end of this month with the affected manufacturers, aircraft operators and maintenance providers before issuing the final AD.

We assume that the concerns raised by the EASA refer to a matter of substance rather than a formal lack of approved maintenance data. Therefore, we would be glad to discuss this topic with the EASA and find a solution taking all the relevant safety aspects into consideration as well as providing the operator with a reasonable timeframe for the proposed modification. We look forward to hearing from you. Enclosures: PAD 10-010

Commenter 281 : Thomas Göppner – 09/02/2010

Comment # 281

Hiermit nehme ich von meinem Recht auf Kommentierung gebrauch. Nach bisherigem Stand waren instandgesetzte Sicherheitsgurte i.O. Es drängt sich hier sehr stark der Verdacht auf, daß wiederummal sich bestimmte Bereiche bereichern wollen.

Commenter 282 : Lux. Aeronautical Federation, Carlo Lecuit and Claude Eschette and Jeannot Grethen – 09/02/2010

Comment # 282

Please find attached the statement of the Lux. Aeronautical Federation concerning the Air Directive (PAD) 10/010 of EASA.

[Ed. Attachment] Find below the statement of the Luxembourgish Aeronautical Federation. Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection

The aeronautical community of Luxembourg is operating powered airplanes, gliders and powered gliders which are partly equipped with the in the Proposal 10-010 mentioned Safety Belts of the Gadringer manufacturer.

Over the past years, most of the safety belts were renewed following the approvals which were given by the German authorities to this manufacturer. Until now, no malfunctions of the safety belts were reported to us in Luxembourg.

As representatives of the pilots within the Fédération Aéronautique Luxembourgeoise, we cannot accept the decision which is mainly based on pure formal but no

technical reasons.

The last renewal of the safety belts was done under current German regulations and our local authorities approved this as done by an authorized manufacturer AND valid for a new period of time of 12 years. It is not acceptable that the existing maintenance programs of the mentioned manufacturers will be annihilated without any reference to deficiency of that organization.

By providing approved maintenance data as you mention in the proposal, the manufacturer does not modify its maintenance technique implying no increase of safety. Leisure air sport activity will be heavily impacted by the consequences of the AD up to ground a large number of aircrafts because of this administrative decision because no time can be found to fulfill the requirements within the time table after the effective date. Since the publication of the Section A.45 of Part 145 in November 2003, no incidents were reported for this reason, it is not acceptable that after a delay of nearly 7 (seven!) years after the publication, private aircraft owners will have to support the consequences of the recent PAD within such a time constrain.

Commenter 283 : Aircraft Cabin Maintenance GmbH , Judith Helbing/ Peter Helbing – 09/02/2010

Comment # 283

wir stehen nach wie vor, vor einem alt bekannten Problem. Die von ihnen geforderten Unterlagen und Informationen sind ausschließlich vom Originalhersteller zu bekommen. Leider liegt es aber den Originalherstellern mehr als fern, uns zu unterstützen, so dass wir keine Möglichkeit haben, die von der EASA geforderten Unterlagen zu bekommen!

Wir haben ebenfalls versucht, die Dokumente über die Airliner zu bekommen. Leider werden selbst großen Airlines keine Informationen vom OEM zur Verfügung gestellt.

Wir haben außerdem Kontakt zu Am-Safe aufgenommen. In diesem Zusammenhang fand ein Meeting mit dem Sales Manager von AM-Safe UK statt. Leider mussten wir feststellen, dass eine Zusammenarbeit mit uns, nicht in deren Interesse liegt. In wie weit es sich hierbei um den unlauteren Ausbau einer Monopolstellung handelt, bleibt zu klären.

Wir möchten betonen, dass es keinerlei Grund gibt, die Qualität unserer Arbeit anzuzweifeln! Von der technischen Seite besteht absolut kein Grund zur Beanstandung. Wir arbeiten mit Originalmustern, verwenden baugleiche Nähbilder und beziehen unser Gurtband bei Firmen, die teilweise auch die OEMs beliefern. Leider ist es uns aber nicht möglich dies zu belegen, da es den Bandherstellern vertraglich untersagt ist, eine solche Auskunft schriftlich zu erteilen. Auch daran wird wieder nur deutlich, dass es im Interesse der Originalhersteller liegt, Firmen wie uns vom Markt zu drängen.

In der Tat sind die wirtschaftlichen Konsequenzen wohl für die meisten Firmen schlichtweg untragbar. Viele Betriebe werden gezwungen sein zu schließen. Alleine das Erscheinen dieser PAD hat uns wirtschaftlich in großem Maße geschadet. Schon jetzt bleiben etliche Aufträge aus. Einige Airlines haben sich sofort nach Veröffentlichung der PAD von unserem Betrieb distanziert.

Das Feedback, dass uns bis jetzt erreicht hat ist durchweg von Unverständnis geprägt. Niemand ist in der Lage diese Entscheidung nachzuvollziehen. Des Weiteren fühlen sich unsere Kunden von den finanziellen Folgen äußerst bedroht.

Für uns ist es sehr schwer, den Kunden begreifbar zu machen, dass wir seit Jahrzehnten mit Zulassung des LBA den Gurtbandwechsel vorgenommen haben und sich dies plötzlich ändern soll. Verständlicherweise wird der Fehler aus der Sicht der Kunden zuerst in unserer Arbeitsweise gesucht. Es liegt dann an uns, zu erklären, dass von unseren Produkten keinerlei Gefahr ausgeht. Das Gurtband hat eine rated strength von über 5000 LBS. Wir verfügen über Prüfzeugnisse für jedes von uns verarbeitete Gurtband.

Der Weg zur DOA den wir nun einschlagen ist für uns leider ebenfalls keine Garantie, dass wir unseren Betrieb aufrecht erhalten können. Zum einen ist die Zertifizierung ohnehin mit immensen Kosten und erheblichem Aufwand verbunden, zum anderen entsteht dadurch das Problem, dass wir die Partnummern des Herstellers nicht übernehmen dürfen. Viele unserer Auftraggeber werden davon abgeschreckt. Es werden uns also in jedem Fall viele Kunden verloren gehen. In wie weit es uns also möglich sein wird, unseren Betrieb auf diese Weise zu retten, ist für uns noch nicht absehbar. Mit freundlichen Grüßen, Judith Helbing/ Peter Helbing

English version:

Dear Sirs, we still face the same well-known problem. The documents, required by you, are only available from the original manufacturer. As you can imagine, the OEM is not keen on supporting us in this matter. So we do not have any possibility to obtain the requested documents!

The airliner have tried as well, to get the documents from the OEM. Unfortunately without success. Even big airlines didn't get any informations by the manufacturers. Furthermore we got in contact with Am-Safe. In this context we had a meeting with the sales manager of Am-Safe UK. Unfortunately it was clearly recognizable, that they are not interested in collaborating with us. It's still to be clarified, whether this is an dishonest monopoly.

We would like to point out, that there is no reason to have any doubts about the quality of our products! There is absolutely no reason for any objection on the engeneering side. We are using original samples, the stitching is structurally identical and the webbing is sourced from manufacturers, which also supply the OEMs. Unfortunately it's impossible for us to provide evidence of this, because they are contractually not allowed, to provide such information in writing. This even conveys, that the original manufacturers have a stake in, to put companies like us out of business.

Actually, the economic consequences are, of course, just unsustainable for many of our firms. Many companies will be forced to give up business. The release of this PAD alone, has affected us to a great extend. Several orders stay out already. A couple of airlines have dissociate themselves from us, immediately after the release of this PAD. The feedback we have received so far, is consistently characterized by incomprehension. Nobody is able to understand this decision. Our clients, furthermore, feel extremely threatened by the financial results.

For us, it's very difficult, to make the clients understand, that we have the approval from LBA for years, and now, without any changes of the product, it seems to be forbidden. Understandably, the customers, suspect technical deficiencies from our side. Than it's up to us, to clarify, that our products are completely safe. The webbing we use, has a rated strength of more than 5000 LBS. We have test reports available for every webbing we use.

Now, we will run another path. We have made the apply for DOA. Unfortunately, even this is no guarantee to keep up our business. On the one hand the certification involves a great deal of expense and considerabel effort, on the other hand, we have to face the problem, that we can't use the P/N of the OEMs anyway. Many of our clients will be deterred by that. We are afraid, that as a result, we will lose a couple of customers. It's not yet in sight, if we are able to save our company that way.

Commenter 284 : Wilhelm Flosbach – 09/02/2010

Comment # 284

Das ist Willkür und völliger Unsinn, oder wird da Meinungsverschiedenheit auf Kosten der Flieger ausgetragen? Und es soll doch in Europa für alle mit gleichen Maßstäben gemessen werden. Viele Grüße ein Flugzeughalter und Pilot

Commenter 285 : Pilatus Aircraft Ltd., Olaf Karkoska, Switzerland – 09/02/2010

Comment # 285

Comments of Pilatus Aircraft Ltd. to EASA PAD No. 10-010

Pilatus Aircraft Ltd. recommends that this PAD not become effective due to the following reasons:

- PAD No 10-010 addresses an administrative mistake without any relation to an observed technical or safety related problem. The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is

according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reasons for the PAD are not given.

- No malfunction of any safety belt, which was maintained at the “blacklisted” repair stations, is known at Pilatus Aircraft Ltd.
- Since years we send safety belts for repair to companies mentioned in this PAD and we could never complain about the quality of the work. Also when we have A/C in maintenance with safety belts from such companies, up to now we could never see any problem even after years in service.
- The compliance time will result in unacceptable long grounding time of the affected aircraft because of the magnitude of logistics aspects for the replacement in the entire EASA community
- The cost for carrying out such an AD will be extensively high. Also, customers will be reluctant to invest in non justifiable seat belt replacements if no safety issue is affected.

Pilatus Aircraft Ltd. would like request you to cancel this proposal AD. Thanks for your consideration.

Commenter 286 : Danish Powered Flying Union , Knud Nielsen – 09/02/2010

Comment # 286

I hereby send Danish Powered Flying Union's comments to EASA PAD No. 10-010, see the document attached. Please acknowledge receipt of this e-mail.

Protest over EASA PAD No. 10-010 Comments from the Board of the Danish Powered Flying Union

The board of Danish Powered Flying Union (DMU) must strongly object to the EASA PAD No. 10-010 due to the following reasons:

- Normally EASA task is to ensure safety in European aviation, but with this PAD EASA is doing the exact opposite, because there is no evidence that shows, that there is any safety problems with the safety belts that is effected with this PAD

- The safety belts was released into services with a Form One

- The companies that is effected by this PAD has maintained the belts under this authorization for many years

- There hasn't been any chance in the safety belts, and the quality of the belts, it is just the rules that have chanced backwards

- The Luftfahrtbundesamt (LBA) in Germany has audited the companies affected by this PAD and EASA has audited LBA without any findings

In Denmark there are approximately 1.000 Danish aircraft owners, of small airplanes, that are effected by this PAD. And it is unrealistic that the manufactures of safety belts are able to produce enough new belts to replace those and there likes in Europe.

Therefore will EASA with this PAD ground the majority of the fleet across Europe not to mention the cost for replacement of the belts. Approximately we are talking about 1,2 million Euros just in Denmark.

The Civil Aviation Administration in Denmark (SLV) released a BL1-1 the 20. December 2007 that stated that all safety belts in all commercial and private airplanes had to be replaced after respectively 10 and 14 years before 1. January 2009.

In an AIC released by SLV the 15. January 2009 the date was chanced to the 1 of April 2009. And finally in an AIC released by SLV the 23 of March 2009, SLV gave a general exposure until further notice.

But by that time a lot of Danish aircraft owners had changed the safety belts due to the originally BL 1-1 and the first AIC from SLV. Those aircraft owners are now in a position where it will cost large sums of money, and possible ground the aircraft for a longer period, just because they did what the Danish Civil Aviation Administration demanded and in good time, and therefore wasn't rescued by the last AIC from 23 of march 2009.

Those aircraft owners' safety belts were chanced to safety belts, which were released into service by a Form One from a company that was approved by the German Luftfahrtsbundesamt. This PAD No. 10-010 from EASA now puts these aircraft owners in a situation where they have followed the Danish Civil Aviation Administration, in good faith, but by doing so they are going to pay because EASA make rules backwards, and not only forward, although there are no safety reasons to consider.

The board of Danish Powered Flying Union must therefore strongly object to this PAD and ask EASA to give the companies, and aircraft owners, affected by this PAD time to correct this problem - if there is any at all – instead of just require replacement of safety belts that are likely perfectly safe. And if EASA think there is security problems at least inspect a percentage of the belts, from each of the companies affected by this PAD, and if there isn't any indications of safety problems, release the belts back into service. But please do this before EASA are grounding a large percentage of the airplanes in Europe.

Commenter 287 : HGS.Intnl .Airport Vogtareuth EDNV, Hermann Selbertinger – 09/02/2010

Comment # 287

Second attempt now, the first attempt yesterday did not work, I'm sorry. [Ed. Attachment]
To Mr. Patrick Goudou, I do not agree with Your intension to introduce the new regulation PAD No. : 10-010 until 10 th. Feb. 2010. I agree with the comments of "Deutscher Aero Club" that the EASA PAD 10-010 is not practicable !!! Therefore I strongly recommend that the PAD will be withdrawn by EASA immediately.

Commenter 288 : Luftfahrt-Bundesamt, Dipl.-Ing. Benno Schmaljohann – 09/02/2010

Comment # 288

German Civil Aviation Authority "Luftfahrt-Bundesamt " comments the PAD 10-010 as follows:

PAD 10-010 states under "Reason" that safety belts and restraint systems..... have been maintained or repaired by maintenance organisations without holding approved maintenance data. Taking this into account, EASA intends to declare seat belts, repaired by four German companies by issuance of an AD to be not airworthy.

LBA wants to stress that no malfunctions of any of the mentioned safety belts are known until now. Furthermore the repair of seat belts by these four companies was approved by LBA under national law until November 20, 2004 for the following reasons: Regulation 2042/2003 entered into force on the 20th November 2003 and following this date a one-year period for the transfer into the new system applied. Until that time the repair according to internal procedures approved by the LBA under national- and JAA-rules was legal under the provisions of the equivalent safety case described under JAR 145.95.

Nevertheless, due to new EU-requirements LBA is aware that, according to PART-145, approved maintenance data are the basis for the maintenance organisation approval of the companies in question and has been trying to settle this problem for several months.

There is however evidence, proved by corresponding EASA Form Ones, that at least one of the four companies affected by the PAD proceeds its repairs on the basis of the same maintenance data as the OEMs do. In this context a problem arises in the case of the ETSO-holders AmSafe and Pacific Scientific. These American companies issue maintenance data of their seat belts for the American market under their national system, making use of AC 43.13 and the associated "standard maintenance procedures". Obviously based on these data, maintenance companies authorised by these ETSO-holders are approved maintenance organisations in Europe according to Part-145. But they make use of the same maintenance data as some of the German companies affected by the PAD do.

Moreover we want to stress that, according to Commission Regulation (EC) 1702/2003, Appendix 1 PART-21.A.609(d), the ETSO-holder is obliged to provide maintenance data to its costumers:

"The holder of an ETSO authorisation under this Subpart shall:

...

(d) Make available to users of the article and to the Agency on request those maintenance, overhaul and repair manuals necessary for the usage and maintenance of the article, and changes to those manuals;

...

As mentioned above and proved by EASA Form Ones the ETSO-holders do repairs or authorise companies to repair safety belts of their production. That means that appropriate maintenance data is available but, contrary to 21.A.609(d), is not supplied to the customers, thus creating the problem highlighted by EASA PAD 10-010. Whatever the reason for not issuing appropriate maintenance data is, it contradicts 21.A.609(d). As the European National Aviation Authorities like LBA are no longer responsible for ETSO-approvals, they have no power to stop this behaviour.

It is not our responsibility, but the question must be allowed, if not only airworthiness requirements but also the rules of the free entry to the European Market are hurt. Without applicable maintenance data no other maintenance organisation would be able to maintain products legally, except those agreed to by the OEM.

Nearly at the same time when the PAD was issued, EASA sent a letter to all European Civil Aviation Authorities. That letter asks for details of maintenance organisations repairing seat belts not later than February 12, 2010. Obviously EASA expects similar cases in other member states of the community. If that is the case those four German companies could feel discriminated by the proposed AD, if they alone were stated in an AD or PAD before the full dimension of the issue is known. Taking into account what we mentioned above, Luftfahrt-Bundesamt so far did not come to the conclusions that aircraft with seat belts repaired by those companies have to be considered to be in a not airworthy condition. We strongly recommend, EASA to reassess the risk of further operation of the repaired seat belts in question and to take actions that ETSO-holders provide appropriate approved maintenance data to the customers as required by 21.A.609(d).

Nevertheless, if EASA does not share this opinion, the AD should be updated as follows:

The list of applicable manufacturers / maintenance organisations might not be complete. Other manufacturers might also be affected.

After completion of the list of applicable manufacturers, it should be clearly stated that the manufacturer Gadringer Gurte GmbH is allowed to maintain seat belts of its own production.

Furthermore the AD should take into consideration that not all seat-belt-manufacturers are still on the market. In those cases an EASA-approved change to the type design by the aircraft TC-holder or an EASA-approved STC would be necessary for further legal operation of the aircraft. This will take time. For that reason these aircraft owners should be given, by whatever means, a chance to purchase new safety belts for replacement in due course.

EASA should take further into consideration that a large number of commercial aircraft and an even larger number of private aircraft (approx. 15000 in Germany and even more all over Europe) are affected by this AD. This amount of seat belts will not be available on the market in the EASA-scheduled time frame. This asks for a prolongation of the proposed date for inspection and replacement. Otherwise, wide areas of civil aviation in Europe will come to a stop.

Commenter 289 : Gerald Sick – 09/02/2010

Comment # 289

hier meine Kommentierung zum PAD10-010: Ich weise die PAD strikt zurück und lehne diese aus folgenden Gründen kategorisch ab.

1. Die PAD bezieht sich in ihrem Inhalt ausschließlich auf administrative Fehler, ohne einen Bezug auf technische und sicherheitsrelevante Probleme erkennen zu lassen. Bemangelt wird das Nichtübereinstimmen der Angaben zur Instandhaltung bei der Zulassung durch die nationale Behörde mit den Verfahren der EASA und damit mit dem geltenden EU-Recht. D.h. technische Gründe oder Fehlfunktionen der genannten Systeme sind nicht als Grund der PAD angegeben.
2. Da die PAD die Regulierung von Verwaltungsakten beschreibt und keinen technischen Hintergrund erkennen lässt, wird diese als unangemessen abgelehnt
3. Die PAD berücksichtigt nicht, dass bis zum in Kraft treten der VO (EG) 2042/2003 (verbindlich für die Allgemeine Luftfahrt in Deutschland seit 01.04.2009) alle Verfahren und Regularien der Wartung und Instandhaltung nach nationalem Recht durchgeführt wurden. Das bedeutet, dass Gurtsysteme, die nach diesen Regularien vorschriftsmäßig gewartet wurden, von der PAD zu auszunehmen sind.
4. Die PAD ist nicht geeignet, da sie administrative und Sicherheitsprobleme vermischt. Luftfahrzeughalter, welche durch die PAD betroffen sind, werden mit Nachteilen konfrontiert, ohne selbst dafür Verantwortung zu tragen.

Commenter 290 : UK CAA, Steve Horton – 09/02/2010**Comment # 290**

UK CAA comments on EASA Proposal to issue an Airworthiness Directive. PAD No. 10-010 Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection.

The Proposed Airworthiness Directive (AD) does not state what the unsafe condition is that requires the need for the AD in respect to the four organisations listed. As EASA is acting, not as the State of Design, but in response to an issue with an organisation holding Part 145 maintenance approval, is the use of an ECI (Emergency Conformity Information) the more appropriate tool?

Part 145.A.45 does not explicitly reference (E)TSO parts, although reference is made for the need for applicable maintenance data, paragraph (b) 4. does allow 'Any applicable standard, such as but not limited to, maintenance standard practices recognised by the Agency as a good standard for maintenance' Any concern regarding the validity of changes to an (E)TSO part, the AD should also make reference to the applicable requirements of Part 21 Subpart M and O.

The four companies in question are established companies who have carried out this work for some time. If this was prior to EASA being established, and if previously approved by their National Authority to carry out the work, then the EASA rules recognises this and allows for them to continue.

The inspection required to determine whether the item is covered by the AD is a physical one only. This would assume that the affected safety belts and torso restraint systems can be readily identified by some form of marking. No clarification has been given as to what these markings should be. The AD should therefore, also include an inspection of the release paperwork to confirm the status of any work carried out on the safety belts or torso restraint systems.

Does EASA plan to issue further AD's or amendments to this PAD to extend the applicability to additional repair/maintenance organisations as further investigations take place? In particular, a large percentage of all items are repaired in the United States to FAA approved repair data and issued with the appropriate FAA release certificate. These items are then accepted (individually or fitted to an aircraft) back into the EU under Decision No 2004/04/CF. This PAD is not dealing with the perceived issue but discriminating against four EU companies.

The PAD requires the identification of any item that has been maintained or repaired by one of the listed organisations, it does not differentiate within the 'Required Actions' between any item that may have been legitimately manufactured by one of the organisations and those that they have only repaired/maintained.

The PAD has identified 4 organisations that have been carrying out maintenance or repair work without the required approved maintenance data. The Proposed AD does not allow any safety belt or torso restraint system that has been maintained or repaired by these organisations to be fitted after the effective date of the AD. Have these organisations stopped carrying out this work, or are they in the process of correcting the deficiency of not holding approved maintenance data? At which time, will items repaired and released by these organisations be allowed to be used?

The PAD does not include details of actions required as to the disposal of any affected removed part. Are these items to be scrapped or can they be re-worked by an approved organisation?

Commenter 291 : Jürgen Thiel – 09/02/2010**Comment # 291**

ich möchte hiermit der im PAD 10-010 Dokument festgelegten Verfahrensweise strikt widersprechen.

Weder sind Ausfälle der von den im 2. Teil benannten Unternehmen gewarteten Gurte bekannt, noch ist von so einer generellen Verfahrensweise eine Verbesserung der bestehenden Situation zu erwarten. Die daraus entstehenden Kosten allerdings belasten wieder einmal die Flugzeugeigner, die in jüngster Vergangenheit mehrfach von Verwaltungsentscheidungen betroffen waren, die in unsinnig kurzer Frist umgesetzt werden sollten und deren Sicherheitswert bis heute umstritten ist.

Zudem ist in diesem Falle eine Reihe absolut kompetenter und bewährter Wartungsunternehmen betroffen. Wenn an der Zuverlässigkeit des verwendeten Materials Zweifel bestehen, kann man auf dem Wege der Materialfreigabe den gleichen Zweck erreichen, wobei unbedingt zu berücksichtigen ist, dass viele der verwendeten Materialien seit Jahren ohne bekannte Versagensfälle im Einsatz sind. Auch die Anerkennung der verarbeitenden Betriebe kann auf gleicher Basis erfolgen, auch hier sollte die über lange Zeiträume nachgewiesene Verarbeitungs-Zuverlässigkeit Basis der Anerkennung sein.

Commenter 292 : AmSafe Aviation , UK., Rockell Cruickshank – 09/02/2010

Comment # 292

Please see attached response regarding PAD10-010. [Ed. Attachment, excluding images:]

In addition to the organisations as listed on the PAD 10-010, AmSafe Aviation UK have also received Restraint systems returned to our facility for overhaul or repair which have been repaired/overhauled by Paustian Airtex GMBH and also Belgraver Aircraft Interiors, please see attached images of Restraint Systems repair/overhauled which were sent into AmSafe by operators.

Paustian Airtex GMBH:[Ed. Images]

Belgraver Aircraft Interiors:[Ed. Images]

Current Approved Maintenance Facilities supplied with approved maintenance data by AmSafe Aviation are:

AmSafe Aviation, Feltham, Middlesex UK

AmSafe Aviation, Chongqing, China

AmSafe, Atlanta.

Tulmar, Ontario Canada

Belt Makers, Los Angeles California

Aviation Belts and Harnesses Townsville Australia.

Also could you tell us if this statement is correct:

We believe that the relabeling or re-identifying of the restraints contravenes Subpart O – Technical Standard Order Authorisations §21.603 TSO marking and privileges which states no person may identify an article with a TSO marking unless that person holds a TSO authorisation and the article applicable TSO performance” is this correct.

Commenter 293 : Association of European Airlines (AEA), Vincent De Vroey, Brussels – 09/02/2010

Comment # 293

In response to the public consultation on the EASA Proposed Airworthiness Directive (PAD) 10-010 (Seat Belts and Torso Restraint Systems) which closes on 10th February, please find attached the AEA comments.

We urge EASA to review its questionable approach on this issue in partnership with the airlines/AEA and solely based on Target Levels of Safety to be achieved including an acceptable Regulatory Impact Assessment (RIA).

[Ed. Attachment as follows]: AEA Comments to EASA PAD 10-010.

The Association of European Airlines (AEA) has carefully analyzed the proposed EASA Airworthiness Directive (PAD 10-010) related to seat belts and restraint

systems manufactured by AmSafe, Pacific Scientific and Schroth Safety Products GmbH.

Based on this analysis as well as test certificates provided by those manufacturers (which confirmed a minimum of 5500 lbs breaking strength of their refurbished safety belts resp. restraint systems), the AEA has not identified any safety justification which would justify issuing an Airworthiness Directive (AD). The AEA therefore respectively asks EASA which Target Level of Safety and objective criteria have been applied for justifying its proposal to issue an AD on this issue as a means to bypass normal rulemaking procedures.

The AEA is concerned that this proposed EASA AD seems mainly driven by commercial interest of some manufacturers as well as a desire from EASA to raise additional revenue from fees and charges for its own budget. Both objectives are in contradiction with EASA's safety mission.

The stock value of safety belts and restraint systems refurbished by concerned manufacturers and owned by the AEA members could be around € 50 MIO. Scrapping of all those safety belts and restraint systems would lead to an unacceptable economical damage to the AEA members.

Moreover, the extremely short compliance time (6 months) of this proposed EASA AD will require grounding of aircraft leading to substantial further economic damage (millions of euro's) which cannot be justified on safety grounds. In addition, manufacturers will not be able to produce the required safety belts and restraint systems in this short time period leading to further operational disruptions to the airline industry. Finally, the proposed AD would require all airlines - no later than 3 months after the effective date of this AD – to inspect the markings of safety belts and torso restraint systems for their entire fleets, to determine if they have been maintained or repaired by one of concerned manufacturers. This would lead to further economic cost to inspect all aircraft fleets. The AEA believes that in any case an alternative means of compliance should be consider for those aircraft which have been fitted with different systems from different manufacturers.

In summary, the AEA believes more safety justification is required from EASA before proceeding with this flawed proposed Airworthiness Directive (AD). We request to careful review this issue in close partnership with the airline industry solely based on Target Levels of Safety to be achieved and based on a thorough Regulatory Impact Assessment (RIA).

Commenter 294 : Jürgen Böttcher – 09/02/2010

Comment # 294

I strongly object to this PAD. It does not serve aviation safety in the least, but places a great financial burden on a/c operators, who are already suffering from recent equipment replacement regulation (Mode S transponders, 406 MHz ELT) as well as extremely high fuel costs. There is no data cited indicating any impact on aviation safety. It is merely a bureaucratic problem which should not be made the cause of financial costs for operators. Surely maintenance of seatbelts is not such a complex activity as to require any special training or instructions.

Commenter 295 : Chris Wieland – 09/02/2010

Comment # 295

hereby I strictly reject EASA PAD No: 10-010 by means that this PAD doesn't rely on any safety issues but, as it seems, on "political turbulences" or "formalities" between EASA, national authorities and manufacturers. As a private pilot I'm not willing to be the grease between formalities.

Unless there are no safety issues there is no need or argument for discriminating manufacturers or maintenance organisations.

Commenter 296 : Eurowings Luftverkehrs AG , Jochen Roessler – 09/02/2010

Comment # 296

Eurowings raise concerns about the EASA PAD No. 10-010 due to unacceptable requirements.

The reason and required action within the PAD is not acceptable as the overhauled safety belts and torso restraint systems were maintained at a maintenance organisation which is authorised by the national authority (LBA). The 12 Years life limit for the webbing of safety belts and torso restraint systems is only applicable in Germany. Additional to the 12 Years LBA requirements the maintenance program require every 4000 flight hours on condition checks at all safety belts and torso restraint systems. With the 12 Years LBA requirements the Germans are more restricted then other EASA members. Due to missing technical reasons for the change of the overhauled safety belts and restraint systems, they should stay airworthy and treated like new manufactured safety belts and torso restraint systems.

Further more it could not be the reason to publish an AD only due to administrative discrepancies between LBA and EASA. Therefore we appeal to EASA not to publish the PAD. It is also not in a proportion to restrict only German maintenance organisation and all other EASA members will be not effected! Also under the aspect that the manufacturers want be able to supply the amount of safety belts and torso restraint systems within 3 month will lead in extension requests or grounding of the aircrafts. Our recommendation to EASA and LBA is again not to publish the AD in this manner. Please think about the consequences for the German economy. Eurowings will have approximately 200'000 Euro costs if the AD becomes affective.

Many thanks in advance for your appreciation.

Commenter 297 : Technische Universität Darmstadt, Dipl. Ing. Martin Stenger - 09/02/2010

Comment # 297

I strictly reject PAD 10-010 because it would have an extremely negative impact on thousands of General Aviation aircraft which are equipped with safety Belts produced by the named Manufactures ore repaired by the affected organisations. There were no indication that safety was compromised by the affected Safety Belts All affected aircraft operators had their safety Belts maintained and repaired in good faith by organisations under the oversight of the Luftfahrtbundesamt or EASA . the question of liability claims against LBA and EASA will definitely arise when the PAD comes into force as drafted. Best wishes for a customer friendly decision

Commenter 298 : Aeroclub Austria, Michael Gaisbacher – 09/02/2010

Comment # 298

With best regards I send the austrian comment against the PAD 10.010. [Ed. Attachment]:

Aeroclub Austra refuses the Proposed Air Directive (PAD) 10-010 of EASA. Aeroclub Austria opposes the proposal because:

The PAD concerns most of the aircraft in use of general aviation in Austria and causes a lot of costs by practically no increase of safety. Furthermore the short timeline would cause problems in availability of competent staff and in-time delivery for new belts. The PAD would lead to grounded aircrafts all over Austria in springtime. The main argument against the directive is the retrospective effect against current national laws. Pilots and owners who acted conform to all directives and laws are now forced to additional expenses for no safety effect. No safety effect because the subject of the criticism was just bureaucratic behavior and not one single occurrence of a belt's malfunction. As there is no significant correlation between accidents or worse outcomes of accidents because of non-functional safety belts within the currently used system the Aeroclub Austria opposes the proposal and strongly requests not to implement the PAD 10-010.

Commenter 299 : SVP IAOPA Europe, Martin Robinson – 09/02/2010

Comment # 299

IAOPA Europe's : Comments on EASA PAD No: 10-010

IAOPA Europe represents 23000 pilots and aircraft owners across Europe and we strongly rejects PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems – Inspection.

The above mentioned PAD would have an extremely negative impact when coming into effect as published. Thousands of General Aviation aircraft are equipped with Safety Belts produced by the named manufacturers and maintained or repaired by the affected organisations. Our estimate is that more than 200,000 Safety Belts would need to be changed in European registered General Aviation aircraft.

As certified replacements for these Safety Belts are not available within the set deadline of three months in the needed quantity, the affected aircraft would have to be grounded. There needs to be an assessment of the cost verses the risk, based on current safety data so that our industry can calculate the overall impact. This may then allow IAOPA to support the proposal which we cannot do at this time. Currently we believe that there is no indication at all that a safety issue exists. .

Instead the heart of the problem seems to be merely an argument on “formalities” between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organisations. Aircraft operators simply must not become victims of this argument. Since 2003 EASA is responsible for Airworthiness of Aircraft in Europe. Most of the affected Safety Belts were maintained under current rules for many years before EASA took over its responsibility in 2003. So it's not understandable why even these Safety Belts repaired and maintained before 2003 should be affected by a conflict the maintenance organisations presently have with newly created EASA regulations. Because all affected aircraft operators had their Safety Belts maintained and repaired in good faith by organisations under the oversight of the NAA's and/or EASA, the question of liability claims against NAA's and EASA is likely to arise if PAD comes into force as drafted.

Commenter 300 : Lufthansa Technik AG, Ruben Schaefer – 09/02/2010

Comment # 300

Please find attached our comment on PAD 10-010. [Ed. Attachment]

We have carefully analyzed the PAD 10-010 and are very concerned about the issue of such an AD. No safety problem connected to a safety belt overhauled by one of the listed LBA approved repair stations has ever occurred. Some of the listed repair stations have worked in this business for over 40 years now without any known quality issues. If one of the mentioned repair stations has violated their EASA Part145 approval, an appropriate reaction would be to restrict or cancel their approval. As

far as we know, past audits carried out by EASA and LBA revealed missing original manufacturer documents, however these problems were not considered severe enough to restrict or cancel the approval. So far, no approvals of the four repair stations have been restricted. Therefore we do not understand why all of a sudden EASA wants to take these drastic steps.

Retroactively the PAD 10-010 bans all safety belts of manufactures listed in the first part of the PAD that have ever been overhauled by the listed repair stations in the second part of the PAD. This also includes safety belts which had been overhauled before EASA regulations became national law. How is that possible without any technical safety concerns?

The PAD 10-010 only includes the five biggest safety belt manufactures, does this mean in return that all other manufactures have published complete CMMs in which all maintenance steps are listed? Why are only these four repair stations listed in the PAD 10-010? Have all other repair stations received complete CMMs?

We would recommend not to publish the PAD 10-010 as an AD as long as there are no technical safety concerns connected to the overhauled safety belts. The approvals of the listed repair stations should be restricted so that no violations to the "EC Regulation 145.45" can occur.

If EASA can not think of any other possibility than to publish this PAD as an AD we would strongly recommend extending the time frame to exchange all affected safety belts. Because of the quantity of affected belts it would not be possible to check and exchange all affected safety belts within the mentioned time frame. This would lead to a grounding of a huge number of aircrafts.

Commenter 301 : European HEMS & Air Ambulance Committee (EHAC), Stefan W. Becker, MSc and Jürgen Zoller – 09/02/2010

Comment # 301

the European HEMS & Air Ambulance Committee (EHAC) represents 31 operators with a total fleet of more than 250 dedicated HEMS helicopters and 33 dedicated fixed-wing aircrafts in 20 countries including all major HEMS & air ambulance operators in Europe. We address ourselves to your authority with regard to the published PAD No. 10-010 and would like to submit our statement as follows:

Most of all helicopter operators and Part-145 maintenance organisations send their safety belts to the companies listed in PAD No. 10-010, Par. (I), for repair or overhaul. This repair stations maintain the parts according to high quality standards and reasonable time of circulation. Also they have a Part-145 approval issued by the LBA and all documents delivered are in conformity with Part-145 regulations.

We don't know about any safety or operational problems using such repaired belts. The consequences of a non-installation directive according PAD No. 10-010 would be dramatic for the industry, as the original manufacturers won't be able to support all operators and maintenance organisations with replacement products in time.

To our knowledge there is no safety problem, so the issue of an AD seems to be unjustified.

In the absence of any safety problem, for operational and economical reasons, we ask you to reassess PAD No. 10-010 and to withdraw the proposed actions for the benefit of the aviation industry.

Thank you for your consideration of our statement and your appreciated assistance. For further questions please do not hesitate to contact us.

Commenter 302 : Dirk Gottschall – 09/02/2010

Comment # 302

wir der Luftsportverein JG 74 "M" bitten darum diese PDA nicht wirksam werden zu lassen. Die Gründe für diese PDA sind absolut nicht nachvollziehbar und unverhältnismäßig und daher anscheinend wieder mal ein Schritt in Richtung "Die Allgemeine Luftfahrt in Deutschland muss sterben". Mit solchen unverhältnismäßigen und unüberlegten Vorschriften gefährden Sie unsere kleinen Vereine und somit auch die Jugendarbeit auf das empfindlichste.

Commenter 303 : Dieter Zimmermann – 09/02/2010

Comment # 303

Most of the affected maintenance organisations by PAD 10-010 have been maintaining a huge amount of safety belts etc. for several decades regarding state of the art. No jeopardy, no failure, no personal injury are known during this time. Thus, any serious method could not assume any problem on these maintained safety belts etc. Hence, PAD 10-010 has to be rejected strictly. As a further result of this PAD EC Regulation 145.A.45 is not serious and has to be withdrawn immediately. PS: Please let me know your plans about EC Regulation 145.A.45 via dieter_zimmermann@gmx.de

Commenter 304 : R & S Aircraft Service, Volker Büschken – 09/02/2010

Comment # 304

anbei unseren Widerspruch gegen die PAD 10-010. Wir bitten um Eingangsmitteilung und Stellungnahme innerhalb der nächsten 8 Werktage.
[Ed. Attachment] hiermit widersprechen wir der PAD 10-010, welche am 14.01.2010 veröffentlicht worden ist. Diese PAD ist nicht gerechtfertigt, weil aus gesamt Europa ausschließlich nur vier deutsche Instandhaltungsbetriebe genannt werden. In Europa und in Deutschland gibt es eine Vielzahl an Unternehmen, die Anschnallgurte instandhalten. Dies hätte eine genaue Recherche der EASA ergeben müssen. Diese PAD ist unverhältnismäßig, da in Deutschland seit mehr als 40 Jahren (R&S seit 13 Jahren) Anschnallgurte instandgehalten werden, ohne das jemals eine Beanstandung oder ein Schadensfall eingetreten ist. Somit stellen die von der Firma R&S instand gehaltenen Flugzeuganschnallgurte kein Sicherheitsrisiko dar. Alleine dies dürfte schon zeigen, wie hoch der Qualitätsstandard der Firma R&S ist. Aufgrund dieser Argumentation gibt es keinen Anlass die Anschnallgurte aus den Flugzeugen entfernen zu lassen.
Am 04.11.2009 hatten wir Besuch des LBA und der EASA. Nach Prüfung unserer Dokumente und unseres Betriebsablaufs zur Instandhaltung der Anschnallgurte wurden von der EASA keine Bedenken geäußert. Technisch ist die Firma R&S einwandfrei aufgestellt und ein Sicherheitsrisiko ist nicht gegeben (Aussage EASA). Aus diesem Grund ist es nicht nachzuvollziehen, dass unsere Anschnallgurte plötzlich ein Sicherheitsrisiko darstellen sollen und unsere Kunden aufgefordert werden, die Anschnallgurte zu entfernen oder den Sitz stillzulegen. Die PAD 10-010 ist für die Firma R&S sowie für unsere Kunden völlig inakzeptabel.
Sollte eine AD auf dieser Basis erscheinen, würden unsere Kunden einen beachtlichen wirtschaftlichen Schaden (in Millionenhöhe) davon tragen. Statt alle Verantwortung bei den Flugzeughaltern abzuladen, wäre es die Pflicht der EASA bei den Herstellern auf eine Einhaltung der gesetzlichen Vorgaben zu drängen. Die approved maintenance data müssen die Hersteller nach europäischer Gesetzlage nach Part 21 den Eigentümern und Nutzern zur Verfügung stellen, damit diese die Produkte lufttüchtig und instand halten können. Da die Firma R&S mehrere Genehmigungen besitzt, ist die Zurückhaltung zur Herausgabe der angeblichen geforderten Unterlagen aus unserer Sicht nur bei den OEM's der Anschnallgurte zu erkennen.
In wie weit es sich um den Ausbau einer Monopolstellung handelt bleibt zu klären. Hier sollte die EASA ihren Einfluss und ihre Energie einsetzen, um der Gesetzgebung Geltung zu verschaffen. Auch die Firma R&S trägt jetzt schon nach Bekanntgabe der PAD 10-010 einen erheblichen wirtschaftlichen Schaden davon, geschweige von dem großen Imageverlust. Aus diesem und o.g. Gründen behalten wir uns in dieser Sache rechtliche Schritte vor. Wir möchten nochmals ausdrücklich darauf hinweisen, dass uns bis heute (08.02.2010) keine Beanstandung unserer Genehmigung seitens des LBA vorliegt. Umso erstaunlicher ist die Aussage in der PAD 10-

010 vom 14.01.2010 das die Firma R&S keine Unterlagen vorweisen konnte. Dies ist schlicht falsch. Alle von der EASA geforderten Dokumentationen zu Instandhaltung von Anschnallgurten wurden vorgelegt. Für den Fall, dass Sie unsere bisher genehmigte Verfahrensanweisung zur Gurtinstandsetzung ablehnen, fordern wir eine Herstellerunabhängige LBA/EASA genehmigte Verfahrensanweisung als Ausnahmeregelung nach EG 216/2008. Vergleichbar mit dem Verfahren in den USA. Alle US-Gurtinstandhaltungsstationen arbeiten mit einem FAA-geprüften Manual. Von diesen US-Firmen hat auch mindestens eine der Firmen eine EASA-Zulassung. Das was die EASA US-Firmen genehmigt, erwarten wir auch für uns. Das können wir verlangen. Hiermit möchte die Firma R&S die EASA darauf hinweisen die PAD 10-010 nicht in geltendes Recht umzusetzen.

Commenter 305 : Michael Zähringer – 09/02/2010

Comment # 305

I strictly reject PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems – Inspection.
Our aircraft was built in 1974. There were no indications that safety was compromised by the affected Safety Belts. I believe it is not a problem for safety in flight. It's essentially a disagreement between EASA, Luftfahrtbundesamt and maintenance organizations. The PAD would have the consequence that are not enough new belts available at the right time and the affected aircrafts would have to be grounded. Nevertheless unnecessary costs would be formed. Please, would you be so kind and resolve this issue at your level and show consideration for the faithful aircraft owners and pilots.

Commenter 306 : Jacques Vandermeulen – 09/02/2010

Comment # 306

please find attached the comments of Brussels Airlines in relation to PAD 10-010. Comments to EASA PAD 10-010 [Ed. Attachment]

- Based on test certificates provided by the affected maintenance organizations (which confirmed a minimum breaking strength), Brussels Airlines is wondering if safety is really compromised.
- The stock value of its safety belts and restraint systems repaired/overhauled by affected maintenance organizations is not negligible. Scrapping of all these parts leads to an unacceptable economical damage to Brussels Airlines.
- The short compliance time of this PAD may require grounding of aircraft because the manufacturers of these belts will not be able to produce the required safety belts and restraint systems in this time period.
- The PAD requires to inspect the markings of safety belts and torso restraint systems, to determine if they have been maintained or repaired by one of concerned repair organizations. The PAD should allow an alternative means of compliance by considering a technical records review and/or logistics historical data to check whether affected belts are installed or not.

Commenter 307 : Thomas Kornblum – 09/02/2010

Comment # 307

There is no proven evidence that safety or health of any person has been compromised in the past. So I strictly reject PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems – Inspection.

Thousands of Safety Belts produced or maintained by the named maintenance organizations have shown an impeccable service record. No accidents or incidents have been reported with premature failure of restrain systems.

When formal issues arise between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organizations they should be handled in a professional manner. If the system has failed, please do not punish the pilots and aircraft owners.

Operational experience shows no evidence for any further action required, beside getting the paperwork done in the organizations.

Commenter 308 : DUCAIR - Luxembourg Air Ambulance S.A., Peter Möller – 09/02/2010
Comment # 308

We are a European HEMS operator and member of the European HEMS & Air Ambulance Committee (EHAC). We address ourselves to EASA with regard to the published PAD No. 10-010 and would like to submit our statement as follows:

Our Company and most of all helicopter operators and Part-145 maintenance organizations send their safety belts to the companies listed in PAD No. 10-010, Par. (I), for repair or overhaul. This repair stations maintain the parts according to high quality standards and in reasonable time. They are approved as Part-145 organization by the German CAA LBA. All documents delivered by them are in conformity with Part-145 regulations.

We don't know about any safety or operational problems using the inspected and repaired belts. The consequences of a non-installation directive according PAD No. 10-010 would be dramatic for the industry, as the original manufacturers won't be able to support all operators and maintenance organizations with replacement products in time.

To our knowledge there is no safety problem, so the issue of an AD seems not to be justified.

In the absence of any safety problem, for operational and economical reasons, we ask you to reassess PAD No. 10-010 and to withdraw the required actions for the benefit of the aviation industry.

Thank you for your consideration of our statement and your appreciated assistance.

Commenter 309 : Aero-Club of Switzerland, René Meier – 09/02/2010
Comment # 309

The technical staff of the Aero-Club of Switzerland studied all relevant and available publications on the subject of your PAD 10-010. This staff did not find any reason justifying the procedure proposed by the Agency.

Our reasoning:

There is no evidence-based necessity of such a measure which affects hundreds of aeroplane operated by our members.

What the Agency proposes is, in our view, not safety, only paper-relevant.

With these points in mind we very urgently ask you not to continue with this PAD, there is absolutely no gain in safety. We very strongly support the point of view of our sister organisation, the Deutsche Aero-Club.

Commenter 310 : Magnus Wagner – 09/02/2010

Comment # 310

formally protest this PAD No.: 10-010. It will not improve safety. Further reasons see comments of DAEC and AOPA.

Commenter 311 : Michael Stowasser – 09/02/2010

Comment # 311

Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection

A: I fully support DAEC as well as AOPA comments and I file herewith a petition against the PAD 10-010 as follows:

The PAD 10-010 has to be removed from the EASA AD list due to the argumentation hereunder.

The problem of the correct documentation can not lead to the action to ground all aircrafts of the civil aviation just because of changes of EASA rules, but without any technical reason especially without any changes in the service process and the material used.

Paper does not make any harness safe or will successfully hold any passengers or pilot in his seat.

The production procedures and practices are performed for decades and no failures occurred due to the applied procedures material and functions. This is called a proven concept.

This PAD does not show any understanding about technical function and risk analysis.

1) General rejection of the PAD 10-010.

PAD 10-010 is strictly rejected by myself, experienced engineer of aero and space technologies, graduated in 1977 with many years in the aeronautic industry, most of the time in quality:

PAD No 10C010 addresses exclusively an administrative mistake without any relation to an observed technical or safety related problem.

The reason for the PAD is the replacement of missing maintenance data of the holder of the ETSO approval by a procedure accepted by the Luftfahrtbundesamt (LBA). This procedure is according to EASA not in line with the applicable European regulation and technical reasons i.e. a malfunction of any of the mentioned safety belt systems as reasons for the PAD are not given.

It seems that EASA wants to cut down all activities in civil General Aviation as Gliding, Motor planes, and Powered Motor gliders due to no competence in doing their work. This is against EASA's mission and not in line with the binding mandate of the European Commission.

2) I am rejecting the PAD as an inappropriate regulation as it is exclusively formally motivated, administrative arguments are presented for the described regulation. There is no technical reason published within the document.

Safety Belts and harnesses have never been broken in any case of accident due to material problems nor maintenance actions in the past. It also has never been the reason for any accident in the past.

EASA is due to showing a high incompetence in knowledge about aviation in the past, technical reasons and technical background.

I impeach the competence of the responsible administrator as well as the competence of EASA. It seems no consultation of any competent persons like harness and seat belt manufacturer took place nor was any risk analysis performed.

3) The PAD addresses all safety belt systems maintained or repaired by the mentioned companies. EUCVO 2042/2003 came into force for aircraft under non commercial operation in Germany on the 1. of April 2009. At the earliest, this regulation was applicable on the 28. of September 2003, before that all procedures for any maintenance or repair issue were performed under effective national rule. Therefore, any safety belt system repaired or maintained under those valid regulations before that date has to be exempted from the PAD.

4) The written regulation is not appropriate due to the fact that an administrative problem is mixed with safety related issues. The owners of aircraft affected by this PAD are faced by disadvantages without any responsibility in this case.

Comment 1:

The list of the manufacturers mentions the company "Autoflug" but the list for Type Approval holders does not. Is this correct?

Comment 2:

The life span of safety belts used in air sport is between 12 and 15 years. Accordingly the last maintenance or repair can have been up to 15 years ago. EUCVO 1702/2003 and 2042/2003 has been only in place for 6 years, for non commercial operated aircraft since April 2009. Before these dates, all maintenance or repair work was performed under national law. The AD can not be valid for any of those procedures as no European law was in force. This is called [protection of vested rights](#).

Comment 3:

The following comment is written from the perspective of the air sport community in Germany. The textile component of the safety belts used in sailplanes or aeroplanes was exchanged at the end of the life span by a maintenance organisation. This was a routinely performed procedure in small air sport aircraft without any observed safety risk. Due to this, it can be assumed that a major part of the aircraft used in air sport is affected by this AD. Even more, as many of these aircraft have a lives span of several decades

First estimates give the following numbers of aircraft that will be affected in Germany:

Approximately 80% of the Sailplanes and Touring Motor Glider: 8.000 aircraft

Approximately 90% of aeroplanes up to 2t MTOM: 6000 aircraft

Taking these numbers into account, about 34.000 safety belts have to be exchanged due to this AD. Costs per safety belt of about 300,- Euro would induce a total amount 10.2 Million Euro. Without any proven advantage on safety.

Comment 4:

Latest 6 months after publication of the AD (LTA) all affected safety belts have to be exchanged or the respective seats have to be inactivated. The hint shall be allowed that sailplanes have a maximum of 2 seats but the majority of those aircraft has only one. Therefore the inactivation of the only seat is no option for the owner as it is actually a grounding of the sailplane. Considering that the second seat is mainly needed for the instructor the aforementioned is also true for the two seater. It is unrealistic, that the manufacturer of safety belts for sailplanes and small aeroplanes (the safety belts for those aircraft differ from those for large aircraft) are able to produce 34.000 new safety belts in a time period of 6 months. Therefore, after 6 months the majority of the fleet used in air sport will be taken out of operation by this AD.

Comment 5:

Maintenance organisations as Gadringer or Schlemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by an approved procedure, accepted by an approved organisation namely the LBA. The by the AD defined unairworthiness of safety belts maintained under the circumstances described is only justified by formal and administrative facts. Due to that the AD is in form and content not proportionate and unacceptable.

Beside that, the AD has to define possibilities to certify retrospectively the maintenance programme to avoid the exchange of all safety belts affected. The Main task of the agency and its related rules is to ensure safety in European aviation under acceptable provisions for the owner of the aircraft used. Therefore, a proposed procedure to fulfil the rules and regulations has also to be written considering the related financial burden.

Comment 6:

The maintenance organisations "Gadringer" and "LTB Schlemann" are certified as Part 145 organisations since 2004. They release their products or maintained parts to service using an EASA "Form One".

Since 2004 both companies were audited at least two times by LBA. LBA itself was audited several times. It has to be assumed, that neither LBA nor EASA performed their duties in an appropriate manner. It has to be investigated, whether LBA and EASA have to compensate the resulting financial damage. In particular it has to be stressed that the company Gadringer-Gurte was audited by EASA and LBA without any findings 2010-02-07.

Commenter 312 : Regional Association of the Aero-Club of Switzerland & Segel und Motorfluggruppe, Grenchen, René Meier – 09/02/2010

Comment # 312

At its quarterly meeting of yesterday evening the Grenchen Regional Association of the Aero-Club of Switzerland, composed of

Segel- und Motorflugschule Grenchen (30 aircraft)

Flugsportgruppe Grenchen (4 aircraft)

Para-Club Grenchen (1 aircraft)

Segelfluggruppe Solothurn (6 aircraft)

Discussed the contents of PAD 10-010. In the opinion of our member clubs the measures you propose are perfectly inappropriate and we urgently ask you not to promote further your PAD, as there is no gain in safety which could be revealed by the participants at our meeting.

We think that we never should try to fix something which is not broken. In the history of our Association we never had an accident or an incident or a loss of life provoked by or in conjunction with safety belts /torso restraint systems.

We strongly prefer to spend our money in flying, in doing so contributing actively to safe flying, instead of paying for unnecessary replacement of aircraft parts fit to fly, just to have perfect paper records. Many thanks for understanding our position,

Commenter 313 : Michael Rabethge – 09/02/2010

Comment # 313

if a translation is required, please contact me.

Sehr geehrte Damen und Herren,

das in der PAD 10-010 angedachte Vorgehen der rückwirkenden Ungültigmachung von zugelassenen Wartungsarbeiten ist eine unangemessene Aktion. Die Gurte wurden von einem für die Überprüfung und Wartung zugelassenem Betrieb nach vom LBA genehmigten Verfahren geprüft und gewartet. Insofern sehe ich keinen Grund die Zulassung der gewarteten Sicherheitsgurte rückwirkend zu entziehen. Wenn überhaupt sollte die Zulassung der Wartungsbetriebe vorläufig ruhen, bis die Herstellungsbetriebe die neuerdings geforderten Papiere zur Verfügung stellen. D.h. den Wartungsbetrieben sollte, wenn überhaupt, nur vorläufig ab der Veröffentlichung der AD die Wartung untersagt werden. Besser wäre es allerdings die Unternehmen gemäß ihrer Zulassung und den vom LBA genehmigten Verfahrensweisen weiterarbeiten zu lassen bis die Herstellerfirmen die Papiere zur Verfügung stellen.

Da die Sicherheitsgurte gemäß den Vorgaben des LBA gewartet worden sind besteht kein technischer Grund den Gurten ihre Zulassung zu entziehen. Da die Gurte gemäß den Vorgaben des LBA gewartet worden sind besteht auch kein zulassungsformaler Grund die Zulassung zu entziehen.

Für eine europaweite Harmonisierung der Zulassung der Wartungsbetriebe ist dieses Vorgehen kein Hindernis, da die zukünftige Wartung in den Wartungsbetrieben nach den EASA Vorgaben erfolgen kann sobald die Hersteller die Wartungsunterlagen zur Verfügung gestellt haben.

Commenter 314 : Michael Goller – 09/02/2010**Comment # 314**

leider kann ich Ihren Antrag auf grounding von allen Flugzeugen mit überholten Sicherheitsgurten in keinster Weise nachvollziehen. Diese Vorgehensweise ist unseriös und unverhältnismäßig. Die überholten Gurte sind in genehmigten Instandhaltungsbetrieben überholt und sicher. Wie kann es da sein, dass die Jahrzehntlang durchgeführte Praxis, plötzlich ein derart großes Sicherheitsrisiko sein soll, dass Flugzeuge gegroundet werden sollen? Ich möchte Sie bitten, diesen Entwurf zu überdenken und nicht durchzuführen.

Commenter 315 : Dr. Walter Kerndlmaier – 09/02/2010**Comment # 315**

as an affected private aircraft owner, please allow me following comments on your proposed AD No. 10-010:

My aircraft is 45 years old and registered in Germany. Its Safety belts have been overhauled every 12 years according to German regulations and based on LBA certified repair procedures.

I am not aware of any safety incident due to deficiencies of these LBA certified repair procedures, which would justify grounding of affected aircrafts until the safety belts are replaced.

I do understand that future overhaul work will have to be according to ETSO procedures. However, I cannot comprehend that maintenance work based on procedures which had been valid at the time of execution, subsequently will be declared as incorrect simply due to a change in the responsible Certification Authority and thus applicable procedures.

As I have only limited budgets capabilities and thus have to count on reliable maintenance planning, PAD No. 10-010 would mean that I will have to postpone other non-mandated, but nevertheless safety-relevant maintenance work on my aircraft. I do not suppose that this outcome would meet EASA intentions.

Commenter 316 : HdF maintenance, Jean-Henri PELISSOU – 09/02/2010**Comment # 316**

This PAD has been sent to us by our supplier LTB Schlemann. More or less 50% of our belts are coming from Schlemann (we maintain about 30 helicopters), thus this AD if published has it is now would have a significant financial impact. After checking a repaired belt (originating Anjou Aeronautique), I observed the followings :

The metallic buckle is marked "anjou aéronautique", meaning that they changed only the web.

The tag on the web is claiming compliance with FAA TSO-C22f, which is the same standard compliance than Anjou Aeronautique.

More, CMM 25-11-96 of Anjou concerning P/N 348-20100 (replaced now by P/N 349 1410 12 070) states in the repair/overhaul section that "Repair/overhaul of aircraft seat belts must only be carried out by manufacturer or qualified agencies specially approved by the aviation authorities." LTB Schlemann has a Part 145 agreement DE.145.0188 delivered by LBA, with a rating C6 equipment concerning aircraft safety belts, thus it is compliant with the manufacturer CMM recommendation about

repair and overhaul, does this PAD means that this agreement is fake? What about other companies having this rating in Europe?

I am not arguing about the non compliance with Part 145.A.45 as no reference is done in case 13 of Schlemann Form 1, but I think that an investigation of the LBA responsible for delivery and control of the Part 145 agreement of a company having 20 years experience of seatbelts overhaul should be done to determine whether or not the reweb for Anjou Aeronautique products has been done with good maintenance practises, as it seems it is the case. This investigation would avoid to companies concerned a loss of time and money, and would show that the Agency is not editing "panic" AD's but AD's based on real safety threat. Thank you for considering my request.

Commenter 317 : Martin Endemann – 09/02/2010

Comment # 317

This concerns your proposed AD concerning the mandatory exchange of seat belts. To my knowledge, there has been no single report of an actual failure of a seat belt from one of the indicated companies. So our proposed AD does not address a safety related issue for my airplane, but only a deviation from new EU rules (some traceability requirement has been violated). Consequently this should be issued as a recommendation, not a mandatory airworthiness directive. ADs should be used only for real safety issues.

Commenter 318 : Peter Fink and Ingrid Hace – 09/02/2010

Comment # 318

als Halter einer Cessna 172 Rocket möchten wir hiermit unseren Protest gegen die geplante PAD 10-010 zum Ausdruck bringen.

Nicht nur, daß allen Haltern, die die entsprechenden Gurte in ihren Maschinen eingebaut haben, Kosten entstehen, die in keiner Relation zum Aufwand stehen, auch werden eine nicht geringe Anzahl von Arbeitsplätzen bei den entsprechenden LTB's akut gefährdet. Im Sinne aller Halter von Flugzeugen der GA bitten wir Sie, diese Maßnahme nochmals zu überdenken.

Commenter 319 : Andreas Albrecht – 09/02/2010

Comment # 319

gegen di o.g. AD erhebe ich Einspruch. Die durch das LBA seit Jahrzehnten legitimierte Praxis der Grundüberholung von Gurten durch zertifizierte Fachfirmen hat sich bewährt und zu keinerlei Sicherheitsproblemen geführt. Da Von Ihner AD nur qualitativ hochwertige deutsche Betriebe betroffen sind, bitte ich Sie dringend zu prüfen ob etwaige Compliance Verstösse für diese sachlich nicht nachvollziehbare AD geführt haben.

Die Sicherheit der Luftfahrt liegt uns allen am Herzen, aber aus Sicherheitsgesichtspunkten unsinnige AD' deren einzige Wirkung Geld- und Existenzvernichtung sind, sind vollkommen kontraproduktiv, untergraben das notwendige Vertrauen in die EASA und diskreditieren Ihre Behörde.

Commenter 320 : Austrian Aeroclub, Dr. Peter Schmutzner – 10/02/2010**Comment # 320**

On behalf of the Austrian Aeroclub I state following comment on the PAD No 10-010 concerning Safety Belts:

- 1.) All safety belts installed in A/C have to be checked, if they are installed by certain organisations and if so, they have to be replaced. Tis AD does not have in view that EC regulation Nr 2042/2003 came in force 20th Nov. 2003. Until this date national regulations concerning maintenance organisations have been in force. In the above mentioned regulation are grandfather rights stipulated, so that the installation of safety belts which have been performed before Nov 2003 are done according to the at this time valid regulations.
- 2.) There is no reason to release an AD because safety issues are not mentioned in the AD. It is obviously an administrative problem that the proper documentation was not available. This administrative failure can be solved in a more economic way insofar, as the proper installation has to be checked again by the Part 145 organisation which has made the installation in order to prevent the economic burden from the operators.
- 3.) If a Form One is issued after the installation of the belts and there is no safety issue, the AD will interfere with the rights of the operator.
- 4.) An important question is who will be liable for the damages which arise. If the maintenance organisation was acting negligent or against the law, the organisation will be liable. If the authority made audits and did not criticize the performance of the works, the authority is also liable for damages.
- 5.) To avoid countless litigations it is favourable to find a more economic solution than to release the AD in this mode.

Commenter 321 : RUAG Schweiz AG, RUAG Aviation, Marcel Gisel – 10/02/2010**Comment # 321**

Please find attached the RUAG CRD for the EASA PAD 10-010, thank you! [Ed. Attachment]

In General, the issuance of any measure against the four concerned German Organizations is a slap in the face of the German LBA (including their professionalism in granting their national 'Herstellerzeugnisse' in the past or EASA POA today) - being a Competent Authority (strange enough, that there are only German 'Violators' by knowing the aviation industry!?).

Furthermore, issuing such measures would be a clear expression of abusive market protectionism as these measures would in fact exclude all competition with regards to Seat Belt MRO and open the doors for the OEM's of these products to charge unjustified prices as only monopolists can. In particular, we would like to comment on PAD 10-010 as follows:

1. We understand that it is clearly stated in EASA Part-21 that only the (E)TSO Holder is allowed to make Design Changes (Repairs and Modifications) to the (E)TSO'd Part/Component.
2. But it is also a Part-21 requirement that a Design will only be approved when the ICA had been created accordingly to support the in-service continued airworthiness (e.g. Repair and Overhaul Instruction) which should be available to the entire aviation industry.
 - a. Nevertheless, it must be observed that in special the seat manufacturers do not provide the industry with required standards of ICA having the required depth to Repair or Overhaul neither the complete seat, part of the upholstery, set belts nor the decorative material (incl. painting). It is sometimes a night mare to repair or overhaul a seat due to wear, damage, soiling or contamination if there is no proper ICA available meeting the Part-145 or TSO-127 standards.
 - b. The industry started to help themselves by finding ways around the situation neither having professional ICA, neither receiving appropriate support from the TSO Holder for refurbishment projects nor being theoretically able to design their own Minor Design Changes to a seat. This became crucial after the industry had also

observed that several manufacturers acquired other competitors to reduce competition and thereafter closed their product lines and even the support of the seats still installed! So the industry started to redesign the seats, upholsteries and seat belts within the limitations of a Minor Design Change according to Part-21 and CS-23/-25/-27/-29 and using the instructions to be found in the appropriate TSO and in accordance with all the various Advisory Material (e.g. AC 25-17A, AC 21.25A, AC 25.583-1, AC 25.562-1B, AC 23.562-1 & TSO-C22g) being available on the FAA homepage.

c. We do realize that this is an unconventional way to help oneself, but it was always tolerated by the National Aviation Authorities and thereafter within EASA by the Competent Authorities. It was even a common process to allow several organisations to become a Production Organisation by receiving the appropriate national approvals to issue legally the applicable JAA Form One or EASA Form 1 for Repair, Modification (Alteration) or complete Overhaul (Preventive Maintenance) within the scope of Part-21 or Part-145.

3. The form of using an AD is clearly an inappropriate measure, since the Seat Belts and Restraint Harnesses have in the past not shown any reason for any increased negative impact in the Level of Safety. Or are there any records available at all showing nonconformities by seat belts having been produced by these four German Manufacturers, whether for TSO'd seat or for any aeroplane, helicopter or glider seat belt or harness system?

a. There must be other measures, like revising the (E)TSOs appropriately, and b. requiring the TSO holders to produce proper ICA allowing industry to be able to Repair, Overhaul and Modify Seats, or c. by declaring:

i. where are the limits or requirements,

ii. what must be done to receive a Design Change approved and

iii. who is allowed to perform the respective Fabrication/Production task as a Part-145 or Part-21G Organisation.

d. Something like the FAA AC 25-21A must be available or accepted in the EASA World, especially when the ICA have not or never been produced properly (also being required by EASA Part-21).

To conclude this Comment/Response Document, we would like EASA to stop this PAD 10-010 process for the time being and check with the European industry to find an acceptable solution and to find out what had been done in the past violating the (E)TSOs and why this happened.

We must be able to keep the Level of Safety and if possible with innovative materials even increase it.

The industry was forced to proceed like this and with the consent of the National Aviation Authorities and even with the approval by some Competent Authorities to become an appropriate Seat Belt PO.

We must keep the focus towards the highest Level of Safety and the Industry also for the highest Level of Customer Confidence (e.g. Seat Upholstery Change, Colour Change, Decorative Options, Responsiveness and Reasonable Costs) and therefore we should benefit from the guidance materials of the (E)TSO-C22g, the FAA AC 21-25A and AC 25-17 A. Otherwise it must be ensured that the original (E)TSO Holders would be able to supply all hundreds of seatbelts within the required time frame as defined within the PAD 10-010, with minimal financial impact to the aviation community and including the necessary recycling solution for all the fully serviceable seat belts to be removed. Finally, the fact that there are EASA-approved Organisations for these seat belts as alternatives to monopolistic OEM's has to our knowledge not lead to any safety issues whatsoever, but instead been clearly beneficial to the aviation industry in the past and also will be in the future.

Commenter 322 : – DYN'AVIATION, Franck Clemenson - 10/02/2010

Comment # 322

We read in this PAD that it concerns "Maintained" or "Repaired" safety belts or torso restrain system. What about brand new parts ? For example, Gadringer Gurte GmbH delivers brand new torso restrain systems, are they also concerned as they have not been repaired or maintained but just manufactured ? Thanks for your reply

Commenter 323 : Edgar Schmid – 10/02/2010**Comment # 323**

fully support the comments of Aopa Germany concerning EASA PAD No. 10-010. As there are no reported accidents in which persons have been killed or injured by unsafe safety belts, it seems to be one more try to hinder the German private aircraft operators by meaningless and bureaucratic regulations issued by EASA. On my opinion, EASA should support the interests of the private aircraft holders in order to keep the sky open.

Commenter 324 : AmSafe Aviation, Ian Burt – 10/02/2010**Comment # 324**

AmSafe Aviation has reviewed this PAD 10-010 and would like to comment on the following:

AmSafe's commitment

- We publish our CMM/ACMM on our web site for our seat belts and restraint systems, if users cannot find the applicable CMM there is an option to request one.
- Our CMM/ACMM define the limitations that we allow any 145 approved organisation to undertake, any additional work not defined in our CMM/ACMM can only be undertaken by an approved AmSafe repair facility (i.e. re webbing etc)
- AmSafe only sells webbing and thread (that we use in our lap belts/restraint system) to our approved repair stations
- AmSafe approved suppliers are contracted to sell webbing only to AmSafe, as the webbing we use is manufactured to our proprietary design TSO Making
- Under FAA 21.603(a) and EN 21A.607 only the TSO/ETSO holder may identify an article with the TSO markings.
- Any change to the webbing is considered a major change and under FAA 21.611(c) or EN 21A.611 no design change other than the original manufacture may be made without the person applying for a separate TSO/ETSO. This would result in a change in part number/model number and then installation on dynamically certified seat could be effected (i.e. TSO C127a requires the cushion/covers/restraint system part number to be included in the seat identification label).

We understand from one of the organisations listed in the PAD 10-010 state that they have done maintenance on safety belts for more than 40 years without any complaints, this does not make it right. We are concerned about the legal liability where a non approved repair station has repaired an AmSafe product (exceeding the limitations defined in our CMM/ACMM) without removing the AmSafe name or part number, as this could then make AmSafe open to a legal action by a third party in the event of a product failure.

AmSafe Aviation London also have restraint systems that are TSO approved and have been effected by unauthorised repair, and under PAD 10-010 section 'Remarks' should our details be included AmSafe Aviation, Units V1& V2 Vector Park, Forest Road, Feltham, Middlesex TW13 7EJ Phone: +44 (0)208 754 2700 Fax: +44 (0)208 754 2799 Please do not hesitate to contact me should you require any additional information

Commenter 325 : Markus Loesing – 10/02/2010**Comment # 325**

Comments by Markus Loesing - registered user

Comment 1 - What is a safety belt designed for?

Most of the non commercial aircraft operated for leisure and private flying in Europe were never crashtested or would perform good in any crashtest compared to them for cars and vans. Mostly the structure of the fuselage or the mounting of the belts will collapse in a fatal way far before any belt would be stressed to its ultimate strength. Any safety factor of the belts is good enough for full full aerobatic flights including overstressing any airplane. I never read of overstressed belts in crash reports. So any discussion about new regulations should be observed from this practical knowledge.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Comment 2 - National Regulations- example:

the national regulations for example in Germany almost guaranteed safety. The maintenance or repair work was performed under national law. Checks daily/before flight by the pilots, standard check routines every 50 up to 100 hours on flight time (depending on aircraft type) and at least the lifetime check by authorized companies/manufactures between 12 and 15 years guaranteed safety so far.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Comment 3 - Formal and administrative facts:

Maintenance organisations as Gadringer or Schlemann maintain safety belts by exchange of the textile parts for 40 years. No safety related incidents are known using these maintained belts over the years. The belts were maintained by an approved procedure, accepted by an approved organisation, the german LBA. The by the AD defined unairworthiness of safety belts maintained under the circumstances described is only justified by formal and administrative facts. Due to that the AD is in form and content not proportionate and unacceptable for me.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Comment 4 - EASA Form One:

the maintenance organisations Gadringer and LTB Schlemann are certified as Part 145 organisations since 2004. They release their products or maintained parts to service using an EASA Form One. What is going on now, are the documents useless now and what is the EASA Form One standing in future? It cannot be that a document handed out by proven and certified companies are useless by a simple change of a regulation.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Comment 5 - Lifetime of material - lifetime extension:

the textile components of safety belts used in sailplanes, light aircraft and other aeroplanes was exchanged at the end of the life span by a maintenance organisation. The material usually performs much longer than 15 years in most of the privat owned aircraft. So any lifetime should be described individually for every part of the belt.

Not a maximum lifetime but an extension of lifetime should be forced with any new regulation. This guarantees safety as well and is also keeping recourses and - for the sport flying community - maintenance costs in an acceptable range.

Commenter 326 : – Lufttransport- Unternehmen GmbH , Frederik Klose - 10/02/2010

Comment # 326

please find enclosed LTU's comment on PAD 10-010:

It has to be considered that, this AD will create a large number of requests to keep the aircraft fleets operating under EU regulation serviceable. LTU for itself has to change nearly 6000 seat belts for a fleet of 24 A/C.

For this the timeframe of the 3 month is too short to exchange all seatbelts, as it will produce a high demand, which may be can't be handled from the existing manufacturers. So that a higher timeframe of 6 month should be selected

This is an unexcitable economical burden to the operator LTU.

However, as long as the manufacturer do not proved a complete component overhaul manual to the operator, it seems that they use the authority to force their monopole.

Commenter 327 : – LTB Schlemann GmbH, Dieter Schlemann - 10/02/2010

Comment # 327

wir, die Firma LTB Schlemann GmbH lehnen die EASA PAD 10-010-1-1 strikt ab und fordern die sofortige Rcknahme.

Wir bestehen darauf, dass ausgelieferte Gurte die bei uns oder einem der benannten Betriebe berholt oder repariert wurden und mit einer EASA FORM ONE ausgeliefert wurden ihre Luftchtigkeit beibehalten.

Ob wir aktuell ber genehmigte Instandhaltungsunterlagen (approved maintenance data) verfgen wissen Sie nicht. Sie haben aktuell von uns keine angefordert und auch nicht nachgefragt. Dementsprechend ist Ihre Begrndung unrichtig, nicht belegt und entspricht nicht der Wahrheit.

Wir besitzen eine gltige EASA-Zulassung und eine gltige Verfahrensweisung fr die Instandsetzung von Flugzeuganschnallgurten, und alle von uns reparierten oder berholten Gurte haben eine gltige JAA oder EASA FORM ONE. Sie knnen uns auch nicht irgend eine Verfehlung vorwerfen. Auch gab und gibt es keine Beanstandungen. Ihre Behauptungen die von uns berholten Gurte wren unsicher ist falsch. Von einer unsachgemien Instandsetzung kann auch keine Rede sein. Solche Behauptungen mssen Sie durch einen unabhngigen Sachverstndigen belegen knnen. Beim Einbau und bei den jhrlichen Nachprfungen in und an den Flugzeugen wurden auch keine Fehler festgestellt.

Kein Gurt wird versagen.

Die von uns verwendeten Gurtbnder fr stationre Gurte haben je nach Type eine Bruchlast von 2500 bis 3000 kg, Schulterrollgurte je nach Type von 2000 bis 3000 kg. Die von uns verwendete Naht hat eine Bruchlast von ca. 2200 kg.

Ittere Gurte sind ausgelegt fr 1500 LBS (ca.680 kg). Neue Gurte nach TSO C-22 g, die sogenannten 16g Gurte, sind ausgelegt fr 3000 LBS (1362 kg). Unsere Werte liegen also weit darber.

Nach Selbstauskunft der Hersteller hat keiner der Hersteller sich bei Ihnen beschwert oder eine Anzeige erstattet.

Falls Sie eine entsprechende AD herausgeben, leiten wir gegen die AD rechtliche Schritte ein, da Sie mit dieser PAD und AD gegen geltendes EU-Recht verstoen. Wir werden Schadensersatz fordern.

Als Instandhaltungsbetriebe sind nur 4 deutsche Betriebe betroffen. Alle anderen Betriebe in Europa (ca 8-10) sind nicht betroffen?

Das ist nach unserer Auffassung mindestens eine Diskriminierung, Behinderung und Schdigung, weil auch die anderen nicht benannten Betriebe nicht ber Hersteller-Instandhaltungsunterlagen verfgen. Das ist ein Versto gegen EU-Recht.

Ein Kunde in der Nhe der niederlndischen Grenze wrde nach einer AD 5 Kilometer ber die Grenze fahren, denn dort drfen die Gurte ohne Hersteller-Instandhaltungsunterlagen dann gemacht werden. Dementsprechend haben wir das gleiche Recht.

Fr den Fall, dass Sie unsere bisher genehmigte Verfahrensweisung zur Gurtinstandsetzung ablehnen, fordern wir eine Herstellerunabhngigen LBA/EASA-genehmigte Verfahrensweisung (Reparaturanweisung) als Ausnahmeregelung nach EG 216/2008.

Vergleichbar mit dem Verfahren in den USA. Dieses wurde uns vom LBA bereits mehrfach in Aussicht gestellt. Alle US-Gurtreparatur-stationen verfgen auch nicht ber Herstelleranweisungen und arbeiten mit einem FAA-geprften Manual. Von diesen US-Firmen hat auch mindestens eine der Firmen eine EASA-Zulassung. Das,was die EASA US-Firmen genehmigt,erwarten wir auch fr uns. Das knnen wir verlangen.

Commenter 328 : Classic Trim Aircraft Interior, Ellen Reichstein and Erik Sørensen, Denmark – 10/02/2010

Comment # 328

Please take a note of the attached file.[Ed. Attachment]

We Classic Trim Aircraft Interior, Part 145 App. no DK1450072 Strongly oppose to this PAD based on the reasons for the PAD and the proposed action.

This Step Taken is a concern not only to us, but also to our customers who trust us to supply interior parts to be in accordance with the regulations. For a number of years we have used Schlemann as a supplier of safety belts which seems to have aroused no problems until recently. We don't understand why it Suddenly becomes a problem, and our customers faith in our credibility might suffer. It seems to be some ind of a desk top war which very few will benefit from.

Commenter 329 : BenAir A/S Denmark, Vagn Leding Jensen and Soren Knudsen and Povl Toft – 10/02/2010**Comment # 329**

Ref. e-mail attachment.

EASA PAD No: 10-010 is strongly objected by Benair A/S due to the following reason:

Safety is not compromised.

Benair has had seat belts maintained by national approved maintenance organisations for almost 20 years.

Our skilled maintenance personnel evaluates the condition of the seatbelts, during maintenance of aircraft, and remove them for repair if there is any doubt of the airworthiness.

The mechanics experience makes him able to evaluate if they are safe or unsafe. Any sun faded webbing, stiffness, frayed or worn edges or other discrepancies, causes the seat belts to be removed and sent to repair.

We inspect every repaired seat belt before installation, and has the experience to be able to judge the work as being airworthy. As good as new in fact.

Because of the high quality and the almost day to day delivery, the use of a national approved repair shop is the most convenient.

The repaired parts are delivered with an EASA form One, has been for years. This never caused any problems with CAA inspectors, until EASA changed their regulations, without securing that the national approved maintenance organisations could continue their good work.

We do not want our sub contractors to be the best to do paperwork. We want to use the people that delivers a safe, quality product. EASA has made regulations that do not comply with previous national regulations. This must be corrected.

Commenter 330 : The International Air Carrier Association (IACA) , Erik Moyson – 10/02/2010**Comment # 330**

In response to the public consultation on the EASA Proposed Airworthiness Directive (PAD) 10-010, IACA would like to forward the following comments for EASA's consideration:

The unsafe condition

What is the unsafe condition this Airworthiness Directive intends to correct ?

Was a specific physical condition identified on the affected seat belts and torso restraint systems, which lead EASA concluding these are no longer able to meet the load conditions for which they are certified ? If there are technical reasons for this Airworthiness Directive, they should be clearly spelled out in the PAD.

Have the listed maintenance and repair organisations (LTB Schlemann, ACM Aircraft Cabin Maintenance GmbH, Gadringer Gurte GmbH and R & S Aircraft Service) used an incorrect Component Maintenance Manual ? Although such is typically assessed during Part-M quality audits; what incorrect maintenance or repair action caused what unsafe condition from what date ? Subsequently, from what date would maintained or repaired seat belts or torso restraint systems be safe again ?

Perhaps the listed maintenance and repair organisations (LTB Schlemann, ACM Aircraft Cabin Maintenance GmbH, Gadringer Gurte GmbH and R & S Aircraft Service) used the correct CMM, but were unable to provide proof of their subscription to the approved maintenance data ? An Airworthiness Directive is not appropriate to correct a commercial problem.

The corrective action

Given the significant number of safety belts and torso restraint systems to be inspected, a simple review of the suppliers used or inspection of maintenance records would provide an equivalent level of safety, but in a much more effective way.

Therefore, we recommend EASA to reassess the appropriateness of this PAD for the unsafe condition it intends to correct, and subsequently, if/as required, to accommodate alternative but more efficient corrective actions, such as an inspection of maintenance records or suppliers used, which provide an equivalent level of safety.

Commenter 331 : – Klaus Schweitzer - 10/02/2010

Comment # 331

Please find attached my comment on PAD 10-010.

I, Klaus Schweitzer, strictly reject PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems – Inspection.

The above mentioned PAD would have an extremely negative impact when coming into

effect as published. Thousands of General Aviation aircraft are equipped with Safety Belts produced by the named manufacturers and maintained or repaired by the affected organisations. After a first estimate I believe that more than 30.000 Safety Belts would need to be exchanged in German registered aircraft.

As certified replacements for these Safety Belts are not available within the set deadline of three months in the needed quantity, the affected aircraft would have to be grounded.

If there were indications that safety was compromised by the affected Safety Belts, immediate action had to be taken and I would support this action. But there is no indication at all that a safety issue exists. Even EASA does not request immediate action and opens a discussion with the stakeholders on the topic.

Instead the heart of the problem seems to be merely an argument on “formalities” between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organisations.

Aircraft operators simply must not become victims of this argument. Since 2003 EASA is responsible for Airworthiness of Aircraft in Europe. Most of the affected Safety Belts were maintained under authorisation of the German Luftfahrtbundesamt, already many years before EASA took over its responsibility in 2003. So it is not understandable why even these Safety Belts repaired and maintained before 2003 should be affected by a conflict the maintenance organisations presently have with newly created EASA regulations.

Because all affected aircraft operators had their Safety Belts maintained and repaired in good faith by organisations under the oversight of the Luftfahrtbundesamt and/or EASA, the question of liability claims against Luftfahrtbundesamt and EASA will definitely arise when the PAD comes into force as drafted.

Commenter 332 : Klaus Hartung – 10/02/2010**Comment # 332**

A week ago I have sent a mail regarding my Aeronca Chief 11AC build 1947 (annex II).

My question was: why is it affecting the safety of my aircraft when I have changed the seatbelts by Schlemann belts?

How can LTB Schlemann get approved maintenance data from the manufacturer of the aircraft, a company being 60 years out of that business (Aeronca did never plan to change the belts on a time based interval. They should be replaced "on condition")?

I didn't get an answer yet.

But how can LTB Schlemann now improve the technique of repairing seatbelts?

How can I get rid of the impression that this regulation is a "paper tiger" and has nothing to do with improving the safety of aviation?

Commenter 333 : European Air Transport Leipzig GmbH, Christian Köth – 10/02/2010**Comment # 333**

In relation to the PAD 10-010 EAT LEJ would like to provide the following comments and additional questions:

Ref /A/: PAD 10-010

Ref /B/: LTB Schlemann

Ref /C/: ACM Aircraft Cabin Maintenance GmbH

Ref /D/: Gadringer Gurte GmbH

Ref /E/: R & S Aircraft Service

Attachment 1: Approved certificate DE.145.0188 (LTB Schlemann) part 145 organisation.

Attachment 2: Gadringer Gurte GmbH TOP URGENT CUSTOMER INFORMATION

Attachment 3 & 4: approved certificates for ref /D/ company

Subject 1)

In relation to PAD 10-010, following reason is mentioned:

... have been maintained or repaired by maintenance organizations without holding approved maintenance data.

Query on subject 1)

We would like to know since when have these companies – ref /B/, /C/, /D/, /E/ - used un-approved maintenance data?

Is it possible to confine the period of time when the seat belts have been overhauled without approved maintenance date?

EAT LEJ assumes that this might be CMM revision related as these companies have been approved by the Luftfahrt Bundesamt (see attachment for affected company ref /B/ signed August 26, 2004 by Mr. Plate (ref attach 1)) or have these companies used unapproved maintenance data since they received their certificate from the LBA?

The reason we ask this question is that we could set up a start date to determine an interval in which affected seat belts have been issued to operators from the ref /B/, /C/, /D/, /E/ overhaul/repair shops. This will facilitate the determination of affected units.

Subject 2)

Records (read: P/N, S/N and mfr info) should be kept at the dedicated departments of the affected companies ref /B/, /C/, /D/, /E/; for the parts that have been overhauled/repaired using unapproved maintenance data.

Query on subject 2)

Could EASA update the related AD in reference to document ref /A/ by listing Mfr name, part and serial-number information?

This will facilitate the inspections on the affected aircraft and prevent scrapping good seat-belts.

Also, in order to support this request to EASA, EAT LEJ would like to inform EASA that there will be a shortage on the market for seat-belts manufactured by the manufacturers as mentioned in ref /A/ document.

The lead time at this moment is 175 days!

Subject 3)

EASA provides mfr-contact info for technical content and requirements of the related ref /A/ document

Query on subject 3)

Could EASA provide contact info and cage codes of the ref /B/, /C/, /D/, /E/ overhaul-shops which have used un-approved maintenance data?

This is for contact reasons.

Subject 4)

In relation to the required actions of ref /A/ document: ... inspect the markings of safety belts...

As 4 companies are involved, there might be different markings / placards / labels on the seat belts involved.

Query on subject 4)

Could EASA provide detailed information to the look or location of these markings / placards / labels?

This could help to identify effected seat belts on the aircraft, implying that the effected seat belts are labeled at all.

Subject 5)

Ref /A/ document mentions following;

Required actions and compliance time:

Item 1) ... *determine if they have been maintained or repaired by one of the following organizations;*

Query on subject 5)

Do all operators have to check the complete history of the overhauls of the seatbelts, or is the last overhaul sheet/Form 1 – if done by a non affected company – sufficient?

Subject 6)

Gadringer Gurte GmbH provided following document:

- see attachment 2: TOP URGENT CUSTOMER INFORMATION

This document list several statements against PAD 10-010.

Query on subject 6) Item 6.1

Could EASA comment attachment 2 document? (all paragraphs)

Additional query on subject 6) Item 6.2

Are similar comments listed by the other affected companies to EASA?

If yes, could EASA provide us their comments on this as well?

Additional query on subject 6) item 6.3

Is it correct as mentioned by ref /D/ company that OEM maintenance manuals haven't been available by the OEMs at the date of the EASA inspection?

Have the OEM's been informed/contacted about this?

Additional query on subject 6) item 6.4

Ref /D/ overhaul shops informed operators that the overhaul has been done as per procedures approved by the LBA.

Could EASA confirm this?

If so, might it be possible that EASA reviews these procedures from the LBA and provide additional comments on this?

If you need any additional information, feel free to contact me,

Commenter 334 : Eastern Air Executive Ltd, England, Ruth Edwards – 10/02/2010**Comment # 334**

EASA PAD 10-010-1-1 - Seatbelts

We are writing in response to the above Proposed Airworthiness Directive.

We oppose the Proposed Airworthiness Directive on the following grounds:

1. EASA has offered no proof whatsoever that the seatbelts etc overhauled by the named Maintenance Organisations are in any way unsafe.
2. EASA/LBA approved the named Maintenance Organisations and their procedures, and continued to grant them that approval for many years. EASA cannot retrospectively un-approve these organisations as unsafe when it has already investigated and approved their procedures. EASA will have no creditability worldwide if it persists in this action, furthermore,
3. EASA has named only four out of several maintenance organisations carrying out similar procedures. It has also approved at least one American company in the USA which is carrying out these procedures. EASA has NO GROUNDS for naming these companies as it has NO PROOF of any action which has affected airworthiness. EASA has demonstrated gross unfairness in its nomination of only certain Maintenance Organisations, and the organisations named will surely have appeal to the European Court.
4. The original seat belt manufacturers have no interest in providing a service for remanufacture/overhaul/repair.

Our company tried very hard to obtain a service from one of them, and they did not even reply.

Is it EASA's intention to ground every aircraft in Europe because the seat belt manufacturers cannot provide a service?

Commenter 335 : Stefan Felmayer – 10/02/2010**Comment # 335**

den von der EASA vorgeschlagenen AD zur Gurtinstandhaltung halte ich für unverhältnismäßig und den Umständen entsprechend für ungerechtfertigt. Die Gurte wurden in Deutschland nach den Richtlinien, die vom LBA geprüft wurden, entsprechend instand gehalten und sind in einem besseren Zustand als z.B. jene in den Staaten.

Meine Bitte an Sie ist, die derzeit geprüften und gültigen Prüfungen bestehen zu lassen und weitere Instandhaltungen nach den neuen (nach den Vorgaben der EASA) Prüfvorschriften durchzuführen. Es besteht derzeit keinerlei Handlungsdruck und Notwendigkeit, so daß eine Nachprüfung der instand gesetzten Gurte keinen Mehrwert für die Sicherheit bringt.

Ich hoffe, daß Sie meine Einwände verstehen und wünsche Ihnen viel Erfolg bei der Findung einer sinnvollen Lösung.

Commenter 336 : Gadringer Gurte GmbH, Petra Gadringer and Harald Müller – 10/02/2010

Comment # 336

[Ed. With attachment ,TUEV-Gutachten_AmSafe.pdf]

in Ihrer PAD 10-010 werden wir, die Firma Gadringer-Gurte GmbH, namentlich als Instandhaltungsbetrieb erwähnt. Wir haben daher zunächst darauf hinzuweisen, daß wir auch Hersteller von Gurten mit Musterzulassung für Luftfahrtgeräte sind. Die luftrechtlichen Vorschriften halten wir sowohl als Hersteller als auch als Instandhaltungsbetrieb genauestens ein.

Ihrer PAD 10-010 liegt die Annahme zugrunde, daß ein Sicherheitsproblem in Bezug auf die von uns instandgehaltenen Sicherheitsgurte der Hersteller AmSafe, Autoflug, Pacific Scientific, Davis Aircraft Products und Anjou bestünde bzw. aufgrund eines Mangels eines Ausrüstungsteils ein unsicherer Zustand an jenen Luftfahrzeugen festzustellen sei, in die von uns instandgehaltene Sicherheitsgurte der genannten Hersteller eingebaut sind.

Diese Annahme ist nicht zutreffend. Die von uns instandgehaltenen Sicherheitsgurte der genannten Hersteller stellen in keiner Weise ein Sicherheitsproblem dar und führen nicht zu einem unsicheren Zustand der betroffenen Flugzeuge.

Sie stützen Ihre Annahme, es bestünde ein Sicherheitsproblem, nach den Angaben in Ihrer PAD 10-010 allein auf den Umstand, daß die Instandhaltung der Sicherheitsgurte von uns vorgenommen worden sei, ohne daß dabei auf aktuelle anwendbare Instandhaltungsunterlagen des Herstellers (approved maintenance data) zurückgegriffen worden sei.

Dies ist so nicht zutreffend.

Die genannten Hersteller von Sicherheitsgurten haben bisher keine Instandhaltungsunterlagen für ihre Sicherheitsgurte herausgegeben. Auf solche konnte daher in der Vergangenheit nicht zurückgegriffen werden.

Beispielsweise hat ein Hersteller uns mitgeteilt, es gebe nur interne Unterlagen, die nicht herausgegeben würden. Ein weiterer Hersteller bietet mittlerweile seine Unterlagen zum Preis von 15.000 USD an.

Offenbar haben Sie erst durch Ihre Ankündigung einer AD den betroffenen Unternehmen einen entsprechenden Markt eröffnet. In der Vergangenheit waren solche Instandhaltungsunterlagen wie ausgeführt jedenfalls nicht erhältlich.

Ganz entgegen Ihrer Annahme bedeutet dies jedoch nicht, daß wir bei der Instandhaltung die technischen Vorgaben des Herstellers nicht eingehalten hätten. Dies war vielmehr der Fall. Die von uns durchgeführten Instandhaltungsmaßnahmen bestehen in der Auswechslung der textilen Bestandteile eines Sitzgurtes. Sitzgurte bestehen aus Gurtmaterial und Beschlägen und sind insgesamt Bauteile ohne hohe technische Anforderungen. Die erforderlichen Vorgaben der Hersteller haben wir stets eingehalten. Die Hersteller haben diese technischen Vorgaben zwar nicht in Papierform oder als Handbuch zur Verfügung gestellt, diese Vorgaben sind jedoch unmittelbar in den Produkten selbst gespeichert und konnten entsprechend gelesen werden. Zum einen betrifft dies die Nähte (Vernähung) der Gurte und das dabei verwendete Garn. Hier haben wir bei der Instandhaltung die Nahtanordnungen der Hersteller genau eingehalten, einschließlich der Anzahl der Stiche.

Zudem haben wir funktions- und spezifikationsidentisches Garn verwendet. Zum anderen betreffen die Herstellervorgaben insbesondere die Zugfestigkeit und schwere Entflammbarkeit des Gurtmaterials. Auch hier haben wir die Vorgaben der Hersteller stets eingehalten, nämlich gleichwertiges oder besseres Material verwendet.

Bezüglich der Zugfestigkeit haben wir schon anlässlich der Musterzulassung für die von uns hergestellten Gurte feststellen lassen, daß das von uns verwendete Gurtmaterial die luftrechtlichen Anforderungen erfüllt, insbesondere auch der TSO-C22f und der TSO-C114. Zudem haben wir den Technischen Überwachungsverein Rheinland Feststellungen zu den Materialeigenschaften der Gurte der Hersteller AmSafe und Davis Aircraft Products Inc. treffen lassen. Als Beispiel fügen wir das entsprechenden Gutachten für die Prüfung der Gurte des Herstellers AmSafe bei. Der TÜV Rheinland hat Originalgurte von AmSafe und von Davis Aircraft Products Inc. sowie von uns instandgesetzte Gurte (zwei verschiedene Textilien) in Bezug auf die Zugfestigkeit überprüft, dabei hat sich herausgestellt, daß beide von uns hergestellten Gurte eine bessere Zugfestigkeit als die AmSafe-Gurte und die Davis Aircraft Products-Gurte aufweisen.

Im Ergebnis erweist sich daher bereits Ihre Annahme, es würde von uns die Instandhaltung von Gurten nicht im Einklang mit den Vorgaben der jeweiligen Hersteller vorgenommen, als nicht zutreffend. Wir nehmen die Instandhaltung vielmehr entsprechend der Herstellervorgaben vor.

Die instandgehaltenen Gurte entsprechen zudem den Vorgaben der TSO-C22f und der TSO-C114 (ETSO-C22g und ETSO-C114). In Bezug auf die verwendeten Textilien beachten Sie bitte auch, daß diese von uns auch bei den von uns hergestellten Sicherheitsgurten verwendet werden, für die wir eine Musterzulassung haben. Deshalb können Sicherheitsbedenken hinsichtlich der Stoffe nicht bestehen, insbesondere deren vorschriftsgemäße Zugfestigkeit und vorschriftsgemäße schwere Entflammbarkeit steht damit außer Frage.

Abgesehen von dem bereits erörterten Umstand haben Sie keine Tatsachen benannt, die Ihre Einschätzung begründen könnte, daß ein Sicherheitsproblem besteht.

Solche Tatsachen gibt es auch nicht, es besteht kein Sicherheitsproblem. Uns ist insbesondere kein Fall bekannt, in dem von uns instandgehaltene Sicherheitsgurte die Sicherheit der Passagiere nicht gewährleistet oder gar gefährdet hätte.

Sicherheitsgurte, die von uns instandgehalten worden sind, entsprechen den nach den luftrechtlichen Vorschriften an Sicherheitsgurte zu stellenden Anforderungen und dürfen daher nicht als Sicherheitsproblem bewertet werden.

Wir haben seit jeher gegenüber unserer Aufsichtsbehörde, dem Luftfahrt-Bundesamt, unsere gesamte Arbeit transparent gehalten.

Insbesondere war das Luftfahrt-Bundesamt über von uns ausgeführten Instandhaltungsmaßnahmen an Sitzgurten im Detail informiert.

Bereits die Ankündigung der von Ihnen beabsichtigten AD hat bei uns beträchtliche wirtschaftliche Nachteile entstehen lassen. Wir erhalten keine Aufträge mehr, uns werden Regressforderungen angekündigt.

Ausgehend vom Vorstehenden bitten wir Sie, vom Erlass der PAD 10-010 ganz abzusehen, die Adressaten jedenfalls nicht zum Austausch von uns instandgehaltener Sicherheitsgurte zu verpflichten, sondern die Lufttüchtigkeitsanweisung in keinem Fall auf uns bzw. von uns instandgehaltener Sicherheitsgurte zu erstrecken.

Bitte beachten Sie, daß Sie gemäß Art. 20 Abs. 1 (j) der Verordnung

(EG) Nr. 216/2008 nur ermächtigt sind, auf ein Sicherheitsproblem zu reagieren, und zu diesem Zweck nach Art. 21A.3B Buchstabe b der Verordnung (EG) Nr.

1702/2003 nur insoweit eine Lufttüchtigkeitsanweisung auszustellen befugt sind, als Sie an einem Luftfahrzeug aufgrund eines Mangels an diesem oder an einem darin eingebauten Motor, Propeller, Bau- oder Ausrüstungsteil einen unsicheren Zustand festgestellt haben und dieser Zustand auch in anderen Luftfahrzeugen vorliegen oder auftreten könnte. Aus dem Vorstehenden ergibt sich, daß diese Voraussetzungen im vorliegenden Fall nicht erfüllt sind. Sie sind daher zum Erlass der angekündigten Lufttüchtigkeitsanweisung nicht befugt.

Commenter 337 : SelfStorage Dein Lagerraum GmbH, Martin Brunkhorst – 10/02/2010

Comment # 337

Attached letter (with PDF) please take note of my comments towards a.m.PAD

I, Martin Brunkhorst, strictly reject PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems - Inspection.

The above mentioned PAD would have an extremely negative impact when coming into effect as published. Thousands of General Aviation aircraft, as well as ours, are equipped with Safety Belts produced by the named manufacturers and maintained or repaired by the affected organisations. After a first estimate I believe that more than 30.000 Safety Belts would need to be exchanged in German registered aircraft.

As certified replacements for these Safety Belts are not available within the set deadline of three months in the needed quantity, the affected aircraft would have to be grounded.

If there were indications that safety was compromised by the affected Safety Belts, immediate action had to be taken and I would support this action. But there is no indication at all that a safety issue exists. Even EASA does not request immediate action and opens a discussion with the stakeholders on the topic.

Instead the heart of the problem seems to be merely an argument on "formalities" between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organisations. Aircraft operators simply must not become victims of this argument. Since 2003 EASA is responsible for Airworthiness of Aircraft in Europe. Most of the affected Safety Belts were maintained under authorisation of the German Luftfahrtbundesamt, already many years before EASA took over its responsibility in 2003. So it is not understandable why even these Safety Belts repaired and maintained before 2003 should be affected by a conflict the maintenance organisations presently have with newly created EASA regulations.

Because all affected aircraft operators had their Safety Belts maintained and repaired in good faith by organisations under the oversight of the Luftfahrtbundesamt and/or EASA, the question of liability claims against Luftfahrtbundesamt and EASA will definitely arise when the PAD comes into force as drafted.

Commenter 338 : Michael Waibel – 10/02/2010**Comment # 338**

PAD 10-010 has to be rejected in my opinion due to the following reasons:

- PAD 10-010 addresses an administrative mistake without any relation to an observed technical mistake or problem. There is no gain in safety by this PAD. Owners of an aircraft like me are faced by disadvantage by this PAD without any personal responsibility in this case.
 - Maintenance and repair of aircrafts under non commercial operation in Germany were performed under national rule (LBA) before 1st of April 2009. Any safety belt system maintained or repaired before this date has to be exempted from this PAD.
 - DAeC estimates that 14000 aircrafts are effected by this PAD and that 34000 safety belts have to be replaced due to this PAD. The capacities of the manufacturers of safety belts are likely not large enough to produce these 34000 belts within 6 months. So the majority of aircrafts used in airports will be grounded after 6 months. This is an inappropriate regulation because there is no technical reason for this measure.
- (Owner of an motorized sailplane ASH25e and certified as "Motorseglerwart" by DAeC)