


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-050 [Published on 18 May 2010 and officially closed for comments on 15 June 2010]

Commenter 1 : BONDTRUST Limited – TOBI MATHEWS – Thu 20/05/2010 12:01

Comment # 1

The narrative in the box “Reason” is confused and should read as follows:

During maintenance, it has been discovered that at the installation of the fixation brackets for rudder spring tabs and trim tabs an incorrect installation of the fixation brackets may have occurred. It is possible that the fixation bracket assembly may be incorrectly orientated and as a result the position of the helicoil inserts on the fixation bracket may be incorrect.

If the orientation of the fixation bracket is reversed or upside down the screws may not reach into the helicoil thread to a sufficient depth.

An incorrect installation, if not detected and corrected, could lead to an in-flight failure of the fixation brackets for rudder spring tabs and trim tabs resulting in a loss of control of the aeroplane.

To address this potential unsafe condition, the TC holder has developed a one-time inspection to detect and correct any incorrect installations of the fixation brackets for rudder spring tabs and trim tabs.

For the reasons described above, this AD requires a one-time inspection of the fixation brackets for rudder spring tabs and trim tabs, to detect and correct any incorrect installations of the fixation brackets and the reporting of all findings to the TC holder. This AD is considered to be an interim action and an improved fixation bracket design is expected to be developed by the TC holder.

The wording of paragraph s (1) and (2) in the “Required Action” box needs to be clarified:

In (1) the reference to the Detailed Visual Inspection should be consistent throughout the AD and should read

“a Detailed Visual Inspection of the fixation brackets for rudder spring tabs and trim tabs in accordance...”

In (2) the wording must be consistent throughout the AD:

“..any incorrect installation of the fixation brackets for rudder spring tabs and trim tabs is detected, before next flight, correct the installation of the fixation brackets for rudder spring tabs and trim tabs in accordance with..”

Airworthiness Directives require precise and consistent wording in order to avoid any misinterpretation or ambiguity.

EASA response: EASA partially agrees. The AD text is changed for clarification.

Commenter 2 : Cirrus Airlines, Luftfahrtgesellschaft mbH, Partner of Lufthansa - Stefan Overhoff – Tue 08/06/2010 14:08

Comment # 2

We would like to send you our statement to the EASA AD 10-050:

In accordance with this SB 328-55-493 / 328J-55-245 the one time inspection is necessary, and integrated in our maintenance flow.

Reason: This AD is considered to be an interim action and an improved design bracket attachment is expected to be developed.

From an operator point of view it makes no sense to change parts which are inspected without any findings. We are not going to replace parts in serviceable condition with new fittings without an improvement in reliability and flight safety. There is no known history about any incident with the Tab-Fittings. Until now there are no findings on the fittings and in the surrounding areas. If some cracks or anything else were found on the brackets we would agree to install the new design brackets as soon as we get them. Even if it were free of charge it will raise the maintenance cost only without any significant increase of flight safety.

After the first ACs which we performed this SB we had no findings.

EASA response: EASA partially agrees. The AD text is changed for clarification (i.e. rectification of a false double negative).

A re-design will correct the possibility of wrong assembly. Introducing improved design bracket attachments does not necessarily lead to the exchange of the complete assembly or bracket. A timeframe for a possible exchange will be determined when the final solution becomes available.