


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 10-091</b> <b>[Published on 01 September 2010 and officially closed for comments on 29 September 2010]</b>

**Commenter 1 : Scandinavian Airlines – Lennart Persson – 20/09/2010**

**Comment # 1**

According to Fokker AOF50-049 of July 06/2010, the useful life of the signs is approximate 7 years after manufacturing date. By nature (isotope radiation), this is independent of use or storage.

On our F50 aircraft, the signs were installed in September/October 1993 with reference to [AD RLD-BLA-93-106](#).

That was for 17 (seventeen) years ago and the signs are now overdue by 1.4 times, meaning that the Exit signs cannot deliver the required illumination in case of an emergency.

It is for that reason not appropriate to propose an inspection, as virtually all signs or strips have lost their capability.

We suggest that the AD should demand an inspection or replacement i.a.w. the referred SB.

The reason to keeping the “Inspection” is only to provide a leeway for the few operators that may have replaced the signs due to LOPA changes.

I.e from this text:

Within 6 months after the effective date of this AD, inspect the Tritium exit signs and emergency lighting strips to determine whether they meet the required brightness and replace any insufficiently bright signs and lighting strips, in accordance with the Accomplishment Instructions of Fokker Services Service Bulletin (SB) SBF50-33-038 or SBF100-33-023, as applicable to aeroplane type.

To this:

Within 6 months after the effective date of this AD, inspect or replace the Tritium exit signs and emergency lighting strips in accordance with the Accomplishment Instructions of Fokker Services Service Bulletin (SB) SBF50-33-038 or SBF100-33-023, as applicable to aeroplane type.

In addition, the Fokker should be forced to amend the MRB/MPD by the date of the compliance date (AD + 6 months), or earlier, that the gap between the AD compliance date and the operator compliance of the MRB/MPD is as minimal as possible.

**EASA response:**

The comment is partially agreed. The Final AD has been amended to clarify that an inspection is not needed if it can be established from records that exit signs were manufactured more than 7 years ago.

Also, in the Final AD text has been added to prohibit installation of exit signs that are older than 7 years or for which the date of manufacture cannot be established, unless the brightness is sufficient to pass the inspection as required by paragraph (1) of the AD.

With respect to forcing Fokker Services to publish the related maintenance task within the compliance time of the AD: the difference between the planned publication

date of this task (July 2011, see the AD) and six months after the effective date of the AD (which is in April 2011) is not considered to have a significant impact on safety when compared to the useful life of the exit signs. Also, the date of publication of the task may not be relevant for operators outside the EU where part M may not be applied.