


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 10-098-CN [Published on 10 September 2010 and closed for consultation on 08 October 2010]</p>

Commenter 1 : Peter Serge Fink - Manor Royal, Crawley, RH10 9NU, UK - Tue 14/09/2010 09:13

Comment # 1

The Technical Note 3053 refers to two independent subjects for clarifying purposes the Technical note by the manufacturer must be separated into two separate Notes dealing with each Item independently.
 Technical notes by manufactures should always only deal with one subject.
 Manufactures must be requested by the Authorities to follow the above mentioned recommendations. If not the an Aircrafts paperwork trail can not be maintained properly, due to the fact that an entry "Technical Note xxx completed on xxx" would again have to be differentiated into what part of the Technical Note has been done.

EASA response:

The regulation does not deal with this type of specific details. So EASA cannot request from manufacturers not to mix various subjects in a same Technical Note. However, we understand the inconvenience that can be occasioned on operators by such groupings.

The comment has no impact on the PAD/AD content.

Commenter 2 : Rob Kleijn - Postbus 149, 3840 AC Harderwijk - Tue 14/09/2010 16:41

Comment # 2

As a glider technician (with AML) the old system of LTA/AD's warned me of a change of the maintenance data such as the extension of service life. Now EASA changes to the system that only an AD will be issued to correct an unsafe condition. In the old system an AD/LTA was issued after release of an SB by the manufacturer with mandatory actions, including change of maintenance data such as the extension of service life. A check of all the AD's on an aircraft type was sufficient. EASA-rules make it more difficult to follow all the changes in documentation of a aircraft type. These result in extra work for EASA, aircraft owners, CAMO-inspectors and technicians.

The LBA has published also LTA's in the past for extension of service life of other glider types. Why do you publish only an AD now for the LS 3? (for instance: On August 9th also the LS 7 extension of service life SB was approved by EASA).

EASA response:

This AD is cancelled because increasing the service life is only optional and has not to be considered as a requirement.

Cancelling LBA-LTA 1988-81 doesn't make invalid the requirements of the Technical DG-Flugzeugbau Technical Note No. 3053 issued the 31 May 2010 and subsequent Aircraft Manual update. In addition, all sailplanes that have implemented actions to increase service life and that continue to comply with it can operate normally.

EASA do no intent to cancel all "Increase of service life ADs". This will be done when there is a triggering event as the issue of a Technical Note.

The LS 7 was certified from the beginning for 6000 hours. So no LBA AD for 6000 h exists and therefore no AD has to be cancelled for the LS7.

The comment has no impact on the PAD/AD content.