


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-122 [Published on the 15th December 2010 and officially closed for comments on the 12th January 2011]

Commenter 1: Air contractors Ltd – Jo Massé – 11th January 2011

Comment # 1

Air Contractors Ltd Technical Services has review ref /A/ document and would like to express following request.

Ref /A/ message list a compliance time of 30 Months or 6000 Flight Hours WOF.

Air Contractors Ltd would like to request a compliance time change into: 36 Months or 6000 Flight Hours WOF.

The reason for this is, when having the 36 Mo incorporation interval, this would make it possible to spread the incorporation plan in conjunction with a 24Mo and 12Mo check as per A-300 program.

This would make it possible to arrange all equipment required and to have this modification done when time and manpower is available.

In reference to this request, Air Contractors Ltd would like to note, as per records review of ref /B/ aircraft, no occurrences have been reported in reference to the defect as listed in the reason section of PAD 10-122. Do note -as far as we know, has to be confirmed by EASA - the defect as listed in ref /A/ document is based on a risk assessment, and not as per defects reported/noted by ref /A/ dedicated aircraft operators.

If you need any additional information in relation to this request, please feel free to let us know

EASA response:

Disagreement.

The compliance time is established from the risk assessment study, and then justified.

Nevertheless, the compliance time being counted from the effective date of the AD, changing it will have no effect. The number of maintenance slots during the next 30 months compliance time depends upon the maintenance program of each aircraft.

Extended time beyond an AD compliance time can be requested to the aircraft State of Registry.