


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-002 [Published on the 20 January 11 and officially closed for comments on the 17 February 11]

Commenter 1: METRO TAXI AEREO LTDA – Luiz O Machado – 27 January 2011

Comment # 1

“First of all, Dassault has to make sure this condition really exists, because a computer event is completely different than a real event, computers normally can make for real, results from the software programmer wishes, if this condition really exists two factors should take in count.

First - The 2000EX has front and rear fuselage tanks, and no skag or any kind of device to protect it from a landing with no gears, or in case of gears separation during landing, may be in this kind of landing if you have a fuselage tank puncture will have the same fuel spillage no matter the landing gears are separated or not. So you solve one unsafe condition and left another similar.

Second- During all the Falcons operating time, a fuel spillage after landing gear separation really happened? How many times? To reduce the fuel amount in the tanks, even small quantity, may lead to reduce the aircraft operational range, even for three or four miles, “see the cases of accidents due to fuel starvation on the final approach, they are not so few”. When I refuel my aircraft one litter counts.

If this unsafe condition is really proven and this AD is issued, 150 months is too much time to compliance, a smarter suggestion is for the next C inspection, on the C during the tank inspection, there is enough access and time to comply, with no significant budget increase, this requirement.

This is my comment. ”

EASA response:

This specific condition was revealed by service experience in 3 cases.

The proposed compliance time of 12 years has been found acceptable by EASA for following reasons:

- the number of additional incidents as predicted by the risk assessment (1.3 incidents in 12 years, assuming a linear retrofit progress and attrition of old aircraft at 40 years) was calculated independently of the risk of fuel ignition, and is therefore a conservative estimate of the number of incidents that may occur in the future with ignition of the released fuel.

- None of the 3 events that have occurred in the past resulted in serious injuries or fatalities. There was either no fuel ignition (2 cases), or enough time for all occupants to evacuate (1 case).

- A retrofit within 12 years is considered by Dassault Aviation to be the best possible effort from an industrial capacity standpoint, considering the number of maintenance organisations in the work capable of doing the work (15), the number of aircraft to be retrofitted (1148), and the number of working hours per aircraft.