


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-106 [Published on 10 October 2011 and officially closed for comments on 07 November 2011]

Commenter 1: Japan Air Commuter – Ryosuke Takamatsu – 1/11/2011 and amended 7/11/2011

Comment # 1

I have a request to the compliance time for the AD which is introduced by PAD NO.:11-106.

As you know by the SAAB SB 340-27-097/-098/-099, the lead time of MOD kit for Stall Warning System modification is around 4 months.

We cannot start to modify the stall warning system without the Kit. The earliest date SAAB340 operators can get the Kit will be middle of January 2012. We have the schedule that MOD will start for first aircraft in March/April 2012 and the last modification will set around April 2014.

Because the volume of this modification is too big, we can perform during only C-Check maintenance. So considering with the any margin, the compliance time which we need is 36 months.

EASA response:

We disagree. The compliance time is made according to guidelines for a corrective action and the availability of modification kit. The delivery time for the Stall Warning Computer are approximately 4 months due to a circulation program, however, the modification kit for the provision SB 340-27-097 are available and can be ordered and installed as soon as possible. It is the installation of the provision SB that takes the longest time and should ideally be performed during a C-check.

The Final AD has not been changed in response to this comment.

Commenter 2: Regional Express – Richard Taylor – 7/11/2011

Comment # 2

Regional Express operates a fleet of 51 SAAB 340 aircraft in Australia. We have been aware of and involved with the proposed new stall warning computer for the SAAB 340. The only issue that we would like to raise is the length of compliance time proposed in PAD 11-106.

At this stage SAAB AB have not supplied the modification kits and these are not scheduled for delivery until February 2012. In order to carry out the required modifications on 51 aircraft within a 24 month timeframe will impose significant scheduling and operational restrictions on Regional Express and therefore we request

an extended compliance time of 36 months.

Other than the compliance timeframe, Regional Express does not have any further comment to this PAD.

EASA response:

We disagree. The compliance time is made according to guidelines for a corrective action and the availability of modification kit. The delivery time for the Stall Warning Computer are approximately 4 months due to a circulation program, however, the modification kit for the provision SB 340-27-097 are available and can be ordered and installed as soon as possible. It is the installation of the provision SB that takes the longest time and should ideally be performed during a C-check.

Out of 65 Saab 340 operators worldwide, it has been determined that there are only 3 operators that have a fleet of 20 aeroplanes or more and 9 operators that have a fleet of 10 aeroplanes or more. If an operator is unable to perform the installation on all aeroplanes in the fleet within the AD compliance time, e.g. because the size of the fleet, Saab will support the operator if they need to apply to their Authority for an extended compliance time (temporary exemption).

The Final AD has not been changed in response to this comment.