


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-122</p> <p>[Published on 24 September 2012 and officially closed for comments on 22 October 2012]</p>

Commenter 1: Company name n/a – Mike Armstrong – Tue 25/09/2012 19:49

Comment # 1

I believe there is a mistake in the above referenced document issued by EASA.

The basic reason to check the elevator seems correct but the actual Required Actions (1) and (3.1) refer to the “.... elevator control rod in the vertical fin ...”. I do not have a glider or manual in front of me but I think that the words “in the vertical fin” are incorrect and should be deleted. Perhaps there has been a mistranslation or a misunderstanding?

EASA response:

In order not to mismatch general items the term “vertical fin” should be changed into “tailplane area”

Commenter 2: Company name n/a – Ron Beecroft – Tue 25/09/2012 22:56

Comment # 2

May I point out that I am somewhat bothered about references to the "elevator control rod in the vertical fin".

There isn't one, as the tailplane is fuselage mounted.

The main elevator control rod runs from the union aft of the cockpit to a trapeze hanger attached to the front face of the fin just above the empennage..

I could also point out that there are already BGA checks extant for distortion of the elevator control arms and misalignment of the bearing between the pads on the control rod.

EASA response:

See comment No. 1

Commenter 3: Anglia Sailplanes Ltd – Stu Hoy – Mon 22/10/2012 02:49**Comment # 3**

I am forwarding an email I wrote in response to PAD 12-122. My first attempt at sending it to Schleicher and yourself failed to send to you.

Reviewing the PAD12-122 I see the required actions paragraph (1) requires the repetition of the inspection called up by the AD to be repeated 'at intervals not to exceed 12 months'.

This requirement creates an unnecessary problem by making the AD and out-of-phase item: if – as we are entitled to do – we elect to carry out the next Annual Inspection by the maximum anticipated period of 90 days and comply with the AD we are fine and in full compliance with the AD. However, if the following Annual Inspection is planned to be carried out on the due date – that is 12 months and 90 days since the last Annual Inspection – compliance with the AD becomes out-of-phase. This means that the aircraft has to be taken out of service for the check otherwise one could consider that the airworthiness of the aircraft is compromised by the lack of compliance on the due date – 12 months from the previous compliance with the AD.

This form of time compliance might be acceptable in the commercial aviation world but for sport flying and in particular for gliders the complications and keeping records of when inspections are due and getting them carried out every 12 months instead of 'at the Annual Inspection' just puts undue burdens on the system.

Can you please look at this requirement – not just for this AD but for all ADs issued for gliders and Self Launching Motor Gliders – with a view to allowing these (annual) inspections to be carried out at the Annual Inspection thus removing of the out-of-phase aspect and the technical compromising of the airworthiness of the aircraft.

All it takes is a change of wording from 'at intervals not to exceed 12 months' to something along the lines of 'at the next and all subsequent Annual Inspections'. This would ease the burden at the operator's end and no one would be flying without compliance with an AD.

From an engineering point of view, if the component to be inspected cannot go 15 months rather than 12 months without the risk of failure then the manufacturer should modify the component with some urgency to remove the risk of failure!

EASA response:

The annual inspection can be pushed up by 90 days, but not delayed. Nevertheless the annual repeat of the AD should be cancelled. The check is part of the annual inspection.

During the consultation period, it was determined that the need for repetitive inspections as it was originally proposed by PAD 12-122 can no longer be substantiated and a one-time inspection fully ensures the acceptable level of safety of the affected sailplanes. Consequently, the Final AD requires only a one-time inspection and (depending on findings) correction.