


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-151 [Published on 27 November 2012 and officially closed for comments on 27 December 2012]

Commenter 1: HB Flugtechnik – Robert Auer – 28/11/2012
Comment # 1

If the repair station does not hold the Approved Data for the specific belts but can demonstrate generic knowledge and technical know-how on how to repair or overhaul those components it shall be considered O.K. as no technical issue may rise up on those components.

If wrong material was used not changing the properties of the belts it also may be considered O.K.

BUT : if wrong material was used changing the properties and jeopardising the safety of the pilot or the passengers an EASA MUST be issued to correct this issue !

EASA response: not accepted

In accordance with the applicable regulation, seat restraint systems may be maintained or repaired by the OEM or by an OEM authorised organisation. In addition, EASA part 21 contains provisions for qualified design organisations to design their own maintenance/repair data, which would allow the maintenance /repair of restraint systems. Up to now at least one European non-OEM company received the authorisation to repair seat belts, mark them with EPA (European Part Approval) and deliver them with an EASA Form 1.

No changes have been made to the Final AD in response to this comment.

Commenter 2: VIF Luftfahrtgesellschaft – Evelyn Kellner – 29/11/2012
Comment # 2

Following are our comments regarding this PAD:

- 1) This PAD is not well written

- a. The Applicability does not allow clear determination for average operators if their installation is affected. Appendix 1 gives some information which could be affected designs but is not conclusive (...but not limited to, ...).
 - b. Content of safety belts/torso restraint system CMMs are not available to most operators/owners (see note)
 - c. Reason: If this is a maintenance problem (caused by improper maintenance) and not a design issue, then EASA is actually not entitled to issue an AD. Especially if there is no actual proof that the maintenance organisation used improper material.
 - d. Reason: Why does a maintenance organisation need to be authorized by the design approval holder to perform maintenance? If the organisation holds applicable repair data this should be sufficient?
 - e. Reason, last para: installed on any aircraft (refer to appendix 1 ..) is misleading □ any aircraft or those listed in Appendix 1?
- 2) Required Actions (2): How come an operator who received an EASA Form 1 properly issued for the parts ordered needs to verify that this Form 1 has been issued illegally or not by contacting the equipment design holder?
- If there are reasonable doubts that Form 1 haven't been issued legally then either the national CAA performing oversight of this organisation shall verify which batches/models haven't been released in accordance with prevailing rules. An EASA AD if appropriate or any national AD issued should then clearly specify to the operators which batches are affected:
- e.g. : All Scientific Pacific restraint systems maintained by maintenance organisation xyz between xx.yy.20zz and aa.bb.20cc and installed on any aircraft iaw Appendix 1 (conclusive and complete list) need to be replaced.
- 3) How responsive do you think will companies be receiving several ten thousands of inquiries from all over Europe????? How detailed will their answers be?

EASA response: not accepted

- 1)
- a. **Please refer to EASA response to comment #20 in this CRD.**
 - b. **Maintenance organizations have to be in possession of applicable maintenance data (e.g. CMMs) to replace seat belts or torso restraint systems on any aircraft.**
 - c. **Please refer to EASA response to comment #1 in this CRD.**
 - d. **Please refer to EASA response to comment #1 in this CRD.**
 - e. **Please refer to EASA response to comment #20 in this CRD.**
- 2) **It is an obligation for operators to comply with ADs issued by EASA. National Aviation Authorities are not authorized to issue ADs. Please refer also to EASA response to comment #10 in this CRD.**
- 3) **This comment is unjustified.**
- No changes have been made to the Final AD in response to this comment.**

Commenter 3: Bombardier Aerospace – Jim Sweeney – 03/12/2012 and 06/12/2012**Comment # 3****Sent on 03/12/2012**

We have reviewed the EASA PAD above dated 27th Nov 2012 and submit the following comment.

The AD should include the following Shorts aircraft models, all of which were fitted with safety belts and torso restraint systems manufactured by AM SAFE & Pacific Scientific including passenger and flight crew seats.

All SD3 models i.e.

SD3-30)
SD3-60)
SD3 Sherpa) Type Cert BA11
SD3-60 Sherpa)

Also should include the Shorts Skyvan SC7 aircraft - Certificated to CAA BCARs (AAN # 10015)

Sent on 06/12/2012

Further to our e-mail sent on 03/12/2012 below, we can now advise that the inclusion of the Shorts aircraft (as listed below) IS NOT required in the above PAD 12-151.

We understand that this is specific to Seat Belts & Torso Restraint systems which were designed to meet Emer Landing - Dynamic Conditions CS 25.562/ FAR 25.562 (i.e. 16G fwd seats).

The Shorts aircraft were not certificated to this requirement and therefore do not need to be included, as previously requested.

Sorry for any inconvenience caused.

EASA response: acknowledged

On 06/12/2012 the commenter has withdrawn his initial comment made on 03/12/2012.

No changes have been made to the Final AD in response to this comment.

Commenter 4: Borajet – Ahmet Diren – 03/12/2012**Comment # 4**

After the publication of the PAD No.: 12-151, we had some confusion. PAD requires the check of the any maintenance action on the belts and torso restraint systems but there is not any referenced publication to perform this action. As this AD will bring a big amount of workload in the fleet, we will be in the need of a clear explanation (like pictorial representation) of the steps that should be performed according to the AD, if published. Could you please advise us if there is any planned publication to

be referenced with the publication of the AD?

EASA response: not accepted

The AD compliance time of 18 month is defined on a risk based decision but also considers the workload involved with the required actions of this AD. No changes have been made to the Final AD in response to this comment.

Commenter 5: Ryanair – Neil Hickey – 05/12/2012

Comment # 5

With reference to PAD 12-151 can you please clarify the following:

1. Is this PAD applicable to harnesses that have had sub assemblies or components of the harness replaced with new parts iaw the approved manufacturers CMM?
2. Is this PAD only applicable to harnesses that have had the webbing repaired/replaced with non OEM webbing or not iaw the latest CMM?
3. If a maintenance facility has capability under EASA part 145 to repair a restraint system iaw the latest CMM then is this considered an acceptable repair and no further action required?

EASA response: not accepted

1. **This AD is not applicable if sub-assemblies or components of restraint systems had been replaced iaw the approved CMM provisions.**
2. **The AD is applicable if webbing repair/replacement was carried out by a maintenance organization without being in possession of applicable maintenance data.**
3. **It would be acceptable if the maintenance was carried out within the allowed frame of repair/maintenance as specified in the relevant CMM.**

No changes have been made to the Final AD in response to this comment.

Commenter 6: Regional Express – Kishor Parajuli – 07/12/2012

Comment # 6

This is in reference to PAD 12-151 dated 27 Nov 2012 regarding its applicability to the large transport aeroplane's flight deck crew safety belts and torso restraint system.

In the applicability section of the PAD, it states that the "All part numbers of safety belts and torso restraint systems installed on any aircraft where dynamically tested seats are required in accordance with Certification Specifications (CS) para. 23.562, 25.562, 27.562 and 29.562, if safety belts and torso restraint systems have been maintained or repaired after 28 September 2003 by maintenance organizations not holding the applicable maintenance data of the relevant approval holders, unless

they are marked with European Parts Approval (EPA)".

As per CS 25.562 (Amendment 10, Dated 2312/2010), flight deck crew seats are excluded from the requirement of dynamic testing. Does this mean the proposed AD is not applicable to the flight deck crew safety belts and torso restraint system of the large transport Aeroplanes?

Could you please clarify?

EASA response: acknowledged

The AD is not applicable for flight deck seats if the certification basis of the subject aircraft does not include compliance with JAR/CS25.562 for those seats.

Nevertheless, the subject aeroplanes may be provided with flight deck seats compliant with JAR/CS25.562 because the U.S. type certification basis for those types (e.g. A330, A380) includes FAR25.562 requiring also the flight deck seats to be compliant.

As long as the subject aeroplanes would be registered in Europe the provisions of this AD would not be applicable for flight deck seats.

However, if these aeroplanes would later be sold/transferred to the U.S. the aeroplanes would need to be brought back in compliance with FAR25.562.

No changes have been made to the Final AD in response to this comment.

Commenter 7: Air Iceland – Gunnar Aðalsteinsson – 13/12/2012

Comment # 7

"The affected safety belts and torso restraint systems may be installed on, but not limited to, the aircraft listed in Appendix 1 of this AD."

And later in the PAD

"This AD requires to inspect safety belts and/or torso restraint systems installed on any aircraft (refer to Appendix 1 of this AD)"

If my aircraft is not on this Appendix 1 list is the AD then not applicable?

EASA response: not accepted

Refer also to EASA response to comment #20 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 8: Aviation Safety Products – Todd Mathews – 14/12/2012

Comment # 8

I understand the desire to ensure safety regarding the matter of seat belts, but certainly all of the repairs that have been accomplished by companies with approved data are not unsafe. The question was raised regarding nylon webbing being used instead of polyester, what about the repairs that were made using polyester webbing? What about repairs that are being made with webbing that is already being used on dynamically certified restraints? Some repair facilities are authorized by one manufacturer and have appropriate webbing and approved processes that will meet TSO-C114 and TSO-C22g that are found on the 16G seat belts, but these companies are not qualified by the remaining manufacturers. I would argue, a repair of the latter manufacturer's restraint using webbing and thread from the former manufacturer would meet any standard that the original belt did.

Additionally, the webbing and thread is milled to specific standards and the stitch pattern can be duplicated. This can be done using the industry standard computerized machines as well as cam type machines that are commonly used by all of the seat belt manufacturers and repair facilities. Accordingly, the repair will be as good and certainly no less safe than any OEM belt. The certified webbing and thread is available for purchase in the marketplace by repair facilities and manufacturers alike.

In conclusion, I believe it would be a mistake to make an across the board disqualification of any seat belt repair not performed by the manufacturer or a company "authorized" by the manufacturer. Webbing and thread can be purchased from the same mills as the manufacturer and sewn by the same machines which are able to duplicate the same stitch pattern. Why should the manufacturer dictate to everyone who can repair their product? What if every manufacturer is granted the same opportunity? If a product is unsafe it has no place in aviation; however, if a repair facility can produce a safe product which is as good as the manufacturer's then they most certainly should be able to provide that service.

EASA response: not accepted

Refer also to EASA response to comment #1 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 9: Steinbeis Flugzeug- und Leichtbau – Werner Scholz – 20/12/2012

Comment # 9

on behalf of the European Sailplane Manufacturers I have the following comments to the PAD 12-151.

[See attachment "EASA_PAD_12-151_1_Gurte2012.pdf"]

We recognize, that this PAD is aimed only at safety belts / restraint systems where a dynamic test is required for certification.

This is not the case for aircraft certified under CS-22 or JAR-22 but nevertheless we would offer some comments / observations, because typical small aeroplanes as certified under CS-23 would be included:

...Obviously this is a continuation of the story which began with PAD

10-010 early 2010 and produced the SIB 2010-15 (R1) in the same year.

...Still this whole issue is more about a maintenance / repair which was not made according to rules as specified in Part-21, but less about a real safety problem.

...Admittedly the required dynamic test has probably not made with such repaired / maintained safety belts / restraint systems, but typically such repairs had to be conducted using clearly specified procedures for the sewing / stitching and the materials used. If this was the case then it MAY be assumed that a safety problem exists, but this is only an assumption. Until such an assumption has been proven it has to respected that these repair / overhaul / maintenance procedures have been approved by local aviation authorities based on real technically sound evidence.

...If such a suspicion of a real safety problem exists, then it would have been more than enough time to conduct a simple research program (within one week, costs minimal) within EASA, to clarify if such a problem really exists.

On the EASA procurement page we find several examples of tenders which by far exceed the costs we speak here about and which do nothing to increase aviation safety.

Instead again a PAD is issued and if this becomes an AD then possibly hundreds or even much more safety belts / restraint systems would need replacement which might be perfectly safe.

Does EASA not see any possibility to work on a real, practical solution to increase safety?

Has it always to be bureaucratic and expensive for the user?

...We issued already an opinion to PAD 10-010, which you find enclosed - the arguments are still valid today:

[See attachment "PAD10-010_comments_ESM_100208.pdf"]

In summary we oppose this PAD as long as it is not coupled with a clear evidence that a real, physical safety problem exists.

PAD and AD should not become an instrument to enforce bureaucratic processes and regulations.

Of course we also want that regulations shall be adhered to, but we are against using PAD / AD as a tool to enforce this.

EASA response: not accepted

As explained in the "Reason" section of the AD, various certification tests involving seat belts with different webbings had been performed also in the frame of recent STC projects concerning seat belt replacement on dynamically tested seats. It became evident that different webbing material properties may have a detrimental influence on occupant protection as well as structural integrity of the seat- seat belt system.

Since the technical details of the above tests are proprietary data of the STC holder EASA cannot reveal more details.

No changes have been made to the Final AD in response to this comment.

Commenter 10: Austro Control – Michael Markus – 20/12/2012**Comment #10**

Please see the following comments to referred PAD:

1. From our point of view it cannot be accepted that operators have to approach the safety Belt Design Approval Holder to find out if the maintenance has been accomplished by an approved Organization. The Design approval holder or EASA should issue a list of Maintenance organizations being part of the AD which have or had the privilege to do maintenance on certain restraint systems. Important to know in this conjunction is the time period or Starting date of this approval because it is not said that this approval has been given still from beginning.
2. An AD has to define clearly which Belts are affected, eg AM Safety Belts, maintained by.....in the Period from – to ...

EASA response: acknowledged

1. ***Operators may have to contact the design approval holder only in case of doubt. If the approval was not given from the beginning, then the restraint system repair may be considered to be unauthorized and as such the belts would have to be replaced or the OEM would need to be contacted for clarification.***
2. ***Due to the huge variety of restraint systems as well as the large number of maintenance organisations, EASA was not in the position to provide such information at the time the PAD was issued. To ease the process for operators, the final AD contains information about repair stations authorized by the different restraint system manufacturers.***

Commenter 11: Nordlandsfly – Anders Eringdahl – 20/12/2012**Comment # 11**

Regarding this Pad No.: 12-151 i want to protest against it.

I looks like it is only the big Safety belt factorys that wants to sell new safety belts alone.

There must be a place to send belts and have overhaul with the same performance as new parts and reseive FORM-ONE if you wish to do that.

EASA response: not accepted

Seat belt manufacturers issue maintenance/repair data on component maintenance manuals (CMM).

Please refer to EASA response to comment #1 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 12: EEA Tech – Stanislav Bajzík – 20/12/2012**Comment # 12**

EASA PAD No: 12-151 concerns all belts that were overhauled somewhere in the world without having maintenance data from the manufacturer.

Maintenance data are not issued by the belt manufacturers.

Please ask for maintenance data from manufacturers - design approval holders, otherwise you are on the way to close down the General aviation in EU

EASA response: not accepted

Please refer to EASA response to comment #1 in this CRD.

In addition, it can be seen from the product list attached to the AD that the majority of General Aviation aircraft are not affected by the AD because dynamically tested seats (in accordance with CS §23.562) were only introduced on few aircraft of more recent design.

No changes have been made to the Final AD in response to this comment.

Commenter 13: AML – Eric Munk – 20/12/2012**Comment # 13**

My comments on your PAD 12-151, which I find a rather worrying development in the light of certification issues that should require a more elegant and efficient paperwork solution than the heavy sanction of AD, imho.

- Dating back the seatbelts to be inspected to 2003, means that apparently there's an apparent 9-year overlooked period of certification audits by EASA. It seems undue burden to make owners or manufacturers carry the costs of this oversight by EASA, as the owners and manufacturers acted in good faith, and received Form 1's with their product that were issued by an EASA-audited organisation.
- The in many eyes questionable short term safety improvements of this PAD are an undue burden to independent EASA-licensed seatbelt manufacturers and provide a threat to the industry that could actually in the long term discourage innovations that could benefit safety, due to less competition in the industry.
- The theoretical unsafe condition should by now (nine years!) be supported by actual accident investigation data that provides practical proof of the issue. If this proof is not there, a more elegant solution could be feasible, e.g. on the next overhaul period (12 year TBO).

EASA response: not accepted.

The oversight for production- as well as maintenance organisations is the responsibility of the National Aviation Authority (NAA) of the country where the organisation is located. In the frame of standardisation audits carried out by EASA after 2009 it was found that in some countries the regulations of EASA part 21 were not entirely followed. This did result in the first PAD (ref. PAD 10-010) in 2010. However, at that time the evidence of a potential unsafe condition was not available and therefore the PAD was withdrawn and SIB 2010-15 was issued instead.

Please refer also to EASA response to comment #9 in this CRD.
No changes have been made to the Final AD in response to this comment.

Commenter 14: Civil Aviation Safety Authority of Australia – Mark Bathie – 21/12/2012

Comment # 14

The Civil Aviation Safety Authority (CASA) of Australia welcomes the opportunity to comment of PAD 12-151 'ATA 25 Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection / Replacement'.

CASA supports the premise of the AD in removing seat belts from aircraft that have been not been maintained and/or repaired in accordance with the applicable maintenance data, as required by the PAD Applicability. However, the Required Action(s) specify the belts have to be maintained by the belt manufacturer's authorised repair organisations. This potentially requires removal of seat belts and torso restraint systems maintained in accordance with the manufacturer's data but not maintained by belt manufacturer's authorised repair organisations. It also requires replacement of belts marked with part approval from other countries outside Europe, e.g. PMA (US) or APMA (Australian PMA).

The unsafe condition appears to have resulted from Design Organisations approving repairs that are not rationally justified. Should the AD not target those incorrect approvals rather than applying to all repairs not conducted by manufacturer authorised repair stations?

Additionally, the Applicability requires "... systems installed on any aircraft where dynamically tested seats are required in accordance with Certification Specifications (CS) para. 23.562, 25.562, 27.562 and 29.562....". The Applicability then references a list of aircraft in Appendix 1. Firstly, the applicability should state "... 23.562, 25.562, 27.562 or 29.562...". Secondly, CASA believes the following aircraft should be removed from the Appendix 1 list:

- Cessna 208, 208B – This aircraft does not contain 23.562 in its certification basis. Whilst some of the seats offered by the manufacturer of the aircraft have energy absorbing capabilities that have even been demonstrated by test, there is no requirement for dynamically tested seats to be fitted and some of the seats offered by the manufacturer for the aircraft do not have energy absorbing features. None of the manufacturer's seats are certificated to 23.562.
- Cessna 172R, 172S, 182S, 182T, T182T, 206H, T206H – These aircraft only require partial compliance with 23.562, needing only to meet the structural compliance requirements and not the injury compliance. Changing the safety harness on these aircraft models does not affect their compliance with 23.562(a) through 23.562(c)(4).
- Boeing B737NG – Whilst CASA does not have access to CRI A.11-04 for the purpose of this review, based on FAA TCDS A16WE, these aircraft only require partial compliance with 25.562, needing only to meet the structural and lumbar injury compliance requirements and not the head and femur injury compliance. Changing the safety belt on these aircraft models will not affect their compliance with 25.562(a) through 23.562(c)(4), (c)(7) and (c)(8).

It is suggested that the applicability needs to be reworded so as not to include partially compliant aircraft. Potentially, the applicability need to refer specifically to aircraft requiring HIC and shoulder harness/femur compliance.

We hope these comments are of some assistance.

EASA response: partially accepted

The AD is applicable to seat belts and torso restraint systems maintained/repared by organisations without applicable maintenance data.

In case of repairs carried out in the USA either by the OEM or a FAA approved third party repair station the provisions of the Technical Implementation Procedures (TIP) of the bilateral agreement between USA and EU are applicable. Consequently, an article which is repaired in the U.S. and released with a dual release 8130-3 is acceptable to be installed on EU registered aircraft.

The AD applicability is amended in accordance with the proposed text. Additionally, consultation of TCDS for Cessna 208, 208B revealed that FAR §23.562 is not part of the TC basis. As a consequence, Appendix I of the AD was amended accordingly.

Aircraft with partial compliance would need to be addressed by the AD. The combination of actual seat, seat belt and seat track attachment on the aircraft floor act as a system and their structural integrity needs to be proven. A different seat belt with different webbing properties (softer or stiffer) may have a detrimental effect on the structural response of the seat or its attachment to the aircraft floor.

Commenter 15: Prince Helicopters – 21/12/2012

Comment # 15

We hereby make an appeal against PAD 12-151.

In our vision the PAD has nothing to do with safety but only financial income for the manufacturer.

EASA response: not accepted

This comment is unjustified (refer to EASA response to comment #9 in this CRD).

No changes have been made to the Final AD in response to this comment.

Commenter 16: Eurocopter – Rémy Antoniotti – 21/12/2012

Comment # 16

§ “Manufacturer”: AUTOFLUG is Eurocopter supplier of safety belt. Why is it not in this §?

§ “Applicability”: refer to § “Reason” below

§ “Reason”: “Maintenance or repair of safety belts and torso restraint systems, if not assessed and justified in accordance with the dynamic test criteria, could therefore result in non-compliance with the applicable certification requirements for emergency landing dynamic conditions”.

In the same way, maintenance or repair of safety belts and torso restraint systems, if not assessed and justified in accordance with the inertial factors test criteria, could therefore result in non-compliance with the applicable certification requirements for emergency landing conditions (refer to CS27/29 §785 and 561(b)).

Unadapted maintenance or repair on webbing, seams, inertial reeling system,.... could induce non-compliance with these requirements. As a consequence, safety belts and torso restraint system could fail to perform their intended function to protect each occupant during an emergency landing condition and to minimise the effects of survivable accidents.

Why EASA no dot enlarge the AD applicability to all part numbers of safety belts and torso restraint systems installed on any aircraft where tested seats are required in accordance with Certification Specifications (CS) para. 27.561/785 and 29.561/785, if safety belts and torso restraint systems have been maintained or repaired after 28 September 2003 by maintenance organizations not holding the applicable maintenance data of the relevant approval holders, unless they are marked with European Parts Approval (EPA)?

EASA response: acknowledged

According to information from company Autoflug, they do supply restraint systems for dynamically tested seats only for Eurocopter military products. Since EASA is not responsible for military products, restraint systems manufactured by the company Autoflug do not need to be included in the AD.

With respect to static requirements (ref. CS §27/29.561, CS27/29.785) static testing of repaired seat belts did not show obvious failures and thus it was assessed that an AD action would not be warranted.

However, EASA SIB 2010-15 does address incorrect maintenance of all seat belts and torso restraint systems.

No changes have been made to the Final AD in response to this comment.

Commenter 17: Detlef Dagne – 21/12/2012

Comment # 17

die Verfasser obiger Notification sind wohl von allen guten Geistern verlassen, haben keinerlei Erfahrung in der Fliegerei oder sind von bestimmten Unternehmen dazu animiert worden. Eigene Pilotenscheine sind vermutlich auch nicht vorhanden und damit fehlt das Grundwissen. Ohne die Grundlagen der Fliegerei kann auch nur Schwachsinn heraus kommen.

Ich für meine Person habe die Berechtigung für Segel-, K- und E-Klasseflugzeuge und den Fallschirmpacker- u. Zellwartschein für Gemischt- und GFK-Bauweise. Damit weiß ich zumindest um was es geht und wo der Unsinn beginnt

Seit Jahrzehnten wurden die Gurten meiner beiden Flugzeuge vom LTB Schlemann überholt und es gab hier keinerlei Probleme. Ebenso die Gurte von Luftfahrzeugen

meines Luftsportvereins. Jeder LTB, der qualifiziert und geprüft ist kann doch hochwertige Arbeit an einem Luftfahrzeug und den entsprechenden Komponenten durchführen.

Was Sie verlangen ist das gerade neu überholtes Gurtzeug ausgebaut und weggeworfen werden soll. Dann soll es mit teurerem (und nicht besseren) vom Hersteller ersetzt werden. Das widerspricht jederlei technischer Vernunft und hat mit Sicherheitsaspekten nichts zu tun. Es sind eher monetäre Punkte, welche ich hier erkenne. In der USA darf trotzdem weiterhin jeder qualifizierte Luftfahrtbetrieb für amerikanisch zugelassene Flugzeuge das Gurtzeug weiterhin überholen bzw. instand setzen.

Die USA ist in der Fliegerei bekanntlich nicht schlechter als wir Europäer, im Gegenteil wesentlich fortschrittlicher und hat in der allgemeinen Luftfahrt bestimmt mehr Erfahrung. Unsere Hersteller in der allgemeinen Luftfahrt können teilweise, vor allem was die Zelle und Fläche in Serienherstellung betrifft, einiges lernen. Bei der Wartung wird den Betrieben genauso auf die Finger geschaut, aber nicht mit solch einer Gängelei, wie sie augenblicklich durch die EASA in Europa erfolgt. Der Blick wird auf die Praxis und sinnvolle Durchführbarkeit unter dem Aspekt der Sicherheit und den Kosten gerichtet. Bei uns ist die Fliegerei für Normalos langsam unbezahlbar geworden, gerade auch durch Ihre Bürokratie. Wir wollen fliegen, das sicher und einigermaßen kostengünstig und nicht sinnlose teure Austauschorgien und noch sinnloseren Papieraufwand durchführen.

Es wird Zeit, dass Ihnen endlich die Europäischen Gesetzesorgane auf die Finger schauen und den Unsinn, welcher von Ihrer Seite kommt ein Ende bereiten. Gleichzeitig sollten die Verantwortlichen in Ihrem Hause zur Rechenschaft gezogen werden und entsprechende Schadensersatzforderungen an Sie gestellt werden.

Es muss endlich Schluss sein mit Verordnungen und Entscheidungen, welche keinerlei Sicherheit bringen und keinen Sinn machen, außer die Taschen von bestimmten Unternehmen zu füllen und bei Ihnen Arbeitsplätze erhalten, welche keinerlei Mehrwert bringen. Mit dem Unsinn, welcher von Ihrer Behörde kommt, versetzen Sie der privaten Fliegerei den Todesstoß und bei der beruflichen Luftfahrt treiben Sie nur die Kosten in die Höhe.

Würden Sie dieselben Verordnungen für Kraftfahrzeuge erlassen, hätten Sie hier einen Volksaufstand und die Herren Piech, Winterkorn, Zetsche und Co. Würden Sie an den Pranger stellen und dafür sorgen, dass Sie innerhalb kürzester Zeit auf das Abstellgleis geschoben werden.

Bezeichnend ist auch, dass dieses PAD kurz vor Weihnachten herauskommt, damit es möglichst wenig bemerken, wenig Widerspruch erfolgt und klamm heimlich in Kraft gesetzt werden kann. Ich für meine Person werde hier allerdings dafür trommeln, dass eine Sammelklage gegen diesen Quatsch in Gang gesetzt wird.

PS.: Ich gehe davon aus, dass Sie Mitarbeiter haben, welche den Brief in Ihre Amtssprache "English" übersetzen. Mein Englisch reicht mit für mein Business, für die Konversation und für die Fliegerei. Obige Schreiben setze ich lieber in meiner Muttersprache (welche ich ja auch nachweisen soll!!!) auf.

EASA response: not accepted.

Please refer to EASA responses to comment #9, #11 and #12 in this CRD.

In addition, it is true that the FAA regulations are different from the EASA rules but in both cases the organisation carrying out seat belt repair/overhaul has to be in possession of an appropriate set of applicable maintenance data to be able to release the repaired/overhauled parts accordingly.

No changes have been made to the Final AD in response to this comment.

Commenter 18: Flugtechnik Stuttgart – Stefan Kull – 21/12/2012

Comment # 18

wir beziehen uns auf die PAD Nr. 12-151 und nehmen dazu wie folgt Stellung:

Es ist für unsere Kunden und uns als PART-145 Betrieb nicht hinnehmbar, dass mit dieser AD die Überholung von Anschnallgurten in Europa nicht mehr möglich ist. Wir sind seit über 20 Jahren zufriedener Kunde der Firma LTB Schlemann und sind von der Qualität der Gurtüberholungen vorbehaltlos überzeugt. In dieser Zeit hatten wir keinen einzigen Grund zur Beanstandung.

Es ist für uns daher in keinster Weise nachvollziehbar, wie die von Ihnen in Auftrag gegebene Studie von Qualitätsmängeln sprechen kann.

Eine Untersagung der Überholung in von der EASA und LBA zugelassenen Betrieben führt zu Betriebsschließungen, Entlassung hochqualifizierter Mitarbeiter und immense Verteuerung der Allgemeinen Luftfahrt. Dies hat einen weiteren Rückgang der Zulassungszahlen der Luftfahrzeuge zur Folge.

Die EASA arbeitet hier eindeutig nicht für sondern in eklatantem Maße gegen die Interessen der Allgemeine Luftfahrt und macht sich mitschuldig an deren Niedergang. Zehntausende qualifizierte Arbeitsplätze sind hiervon betroffen.

Wir werden mit unseren Kunden die Haltung der EASA diskutieren und fordern eine Rücknahme dieser nicht nachvollziehbaren Maßnahme.

EASA response: Not accepted.

Please refer to EASA responses to comment #9, #11 and #12 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 19: Kempen Aircraft Maintenance – Arthur H Grevelink – 21/12/2012

Comment # 19

Herewith we like to express our concern related to the Proposed ruling PAD 12-151 issued by EASA 27 November 2012.

The wording of the PAD is directing the end users of Seatbelts, in particular in the field of non-commercial Aircraft operation with Aircraft <5700Kg, to remove and discard/exchange serviceable seatbelts. This for the main reason of the Belts are not handled direct by or indirectly in according to instructions of the design approval

holder.

The main argument issued by EASA:

"In particular, the affected restraint systems have been refurbished using webbing materials having mechanical properties significantly different with respect to the materials used to manufacture the original restraint systems (e.g. Nylon instead of polyester.)

The report with reference to seat belt degradation in relation to age and material (Nylon versus Polyester. [EASA.2010.C21/EASA.E2.2011.C11 / SEBED / (Phases I and II) / Seat Belt Degradation.] is in basic referring to the belt elongation characteristics and the slippage of the webbing through Buckles related to its type of design. This report is however nuancing the overreacted measurement which is taken by issuing the EASA PAD 12-151.

The maintenance instruction for manufactured seatbelts / Torso Restraint systems should indicate the inspection interval in according to the manufacturers instruction on wear and tear and the Maintenance program may indicate a replacement hard time for the webbing with or without a stretch test. A final hard time overhaul/test/replacement of webbing after 10 years is not uncommon.

However the Airline industry is expecting from EASA that it will weigh the interest of the Operator (safety / economically) against the interest of the TC Holder or Industry. By reading the PAD 12-151 the users are forced to return their equipment to the original manufacturer. Other MRO Organizations (previously approved, to inspect and replace the webbing and issue a Form 1) are now forced to become a by the OEM approved repair shop. This will increase unnecessary the maintenance cost without improving direct safety.

This is to the least presently not understand by the approved MRO's organizations and Operators when keeping in mind that:

- the Webbing is not made by the OEM them self's but ordered against an industrial standard. (Polyester material specifications and Webbing material manufacturing specifications)
- the required rated strength of the Safety Belt assembly shall be shown. [1,500 pounds and 3,000 pounds][3,000 pounds and 6,000 pounds]
- The design approval of the Buckles is in line with NAS and identified by the applicable TSO marking. [FAA-TSO-C22f / E-TSO-C22f]

And

- As an end user is being forced to exchange the Safety Belts / Torso restraint, which are maintained and overhauled by means of installing new webbing which can only be performed by the OEM or in concert with instructions of the OEM, looks like an overstressed action in combination with an action of the (5) by EASA mentioned Manufacturers in order to regain control over the repair/overhaul of their manufactured assembled product. This protectionism is at least not in line with the free European market philosophy.

The interest of the industry is that the specifications, when standard materials are used, and the Origin of the material is controlled.

We therefore request EASA to not issue the proposed AD and put more effort into the revision of the TSO-C22f. This to indicate the standard materials specifications

and type of material to be used.

And

To coordinate with the FAA that there will be a common policy with respect to the licenses issued to FAA repair station/maintenance organizations. This to avoid that the FAA approved shops can issue not only a FAA Certificate 8130-3 but most likely in some cases also the EASA Form 1.

EASA response: not accepted.

Please refer to EASA responses to comment #9, #11 and #12 in this CRD.

In addition, the TSO/ETSO requirements (ref. TSO-C22f) as well as the different ratings (1.500, 3.000 pounds) do only address the static strength of seat belts and restraint systems. Any capabilities of the seat belts with respect to dynamic crash landing conditions are out of scope of the TSO/ETSO because this can only be evaluated and justified on aircraft level involving the original seat as well as the attachment to the aircraft floor.

The FAA has a different regulatory system but the bilateral agreement between USA and EU contains provisions for organisations to receive an authorization for dual release (FAA 8130-3, EASA Form 1).

No changes have been made to the Final AD in response to this comment.

Commenter 20: British Airways – Mark Saunders – 21/12/2012

Comment # 20

Section “Applicability”: The affected safety belts and torso restraint systems may be installed on, but not limited to, the aircraft listed in Appendix 1 of this AD.”

This paragraph makes the requirement confusing, does the inspection apply to only the aircraft in appendix 1 or to any other aircraft.

Section “Reason” For the reasons described above, this AD requires to inspect safety belts and/or torso restraint systems installed on any aircraft (refer to Appendix 1 of this AD) to verify if they have been maintained or repaired by the design approval holder or by a repair station/maintenance organization authorized by the design approval holder, and to replace the affected safety belts and torso restraint systems with serviceable parts.”

This paragraph is not clear it refers to” any aircraft “ and then refers to “Appendix 1 of this AD”. It is not clear which aircraft the AD applies to, any aircraft or just those referred to in Appendix 1.

Section “Required Action(s) and Compliance Time(s)”: Within 6 months after the effective date of this AD, inspect the markings of safety belts and/or torso restraint systems, to determine if they have been maintained or repaired by organisations other than the design approval holder. A review of the applicable maintenance records is acceptable to identify the safety belts and/or torso restraint systems as specified in this paragraph, provided those records can be relied upon for that purpose, and the affected safety belts and/or torso restraint systems can be conclusively identified from that review.”

This paragraph has no mention of the aircraft in Appendix 1, and therefore implies we must inspect, or prove by records, that all seat restraints have been

verified as detailed.

EASA response: not accepted

The standard terminology used by EASA for any AD on parts and appliances is: “this part is known to be installed on, but not limited to, the following aircraft: [...]”. This is due to §21.A.3B of Regulation 748/2012, which requires the AD to identify aircraft where the unsafe condition might exist or develop.

Appendix I of the AD must be intended as a “minimum list” of aircraft (but not limited to) where affected restraint systems might be installed.

Affected restraint systems are already identified in the AD applicability; it is not EASA practice to repeat the applicability in the “Required actions and Compliance Time” section of the AD. This section shows the required actions (and relevant compliance times) to be accomplished on the parts specified in the AD applicability.

No changes have been made to the Final AD in response to this comment.

Commenter 21: Airbus – Lydie Bedolis – 21/12/2012

Comment # 21

- What is the FAA’s position?
- Does EASA know what repair organization(s), what belts P/Ns are exactly targeted? Rather than targeting all seat belts suppliers and all belts P/Ns – S/Ns
This AD seems to be applicable to all belts repaired on all A/Cs – showing compliance seems to be a burden for operators
Why only 5 safety belt manufacturers are affected by this issue?
- Clarification applicability / effectivity: on the type of safety belts impacted (cockpit, crew, pax, 16g seats only, list of belts P/Ns)
- Are the safety belt and torso restraint systems impacted the cockpit crew or/and cabin crew or/and pax seats?
- Only Pacific’s SIL is referenced. What’s about for the other manufacturers? (ie similar lists of approved repair organizations for all parts affected by this AD)
- Appendix I not accurate.
- For conformity aspects, need to have a paragraph specifying that the A/C delivered with new safety belts are not affected.
- Paragraph that clarify that no required actions for new safety belts approved by DOA
- Why does the AD allow as long as 6+18 months to replace non compliant belts (on which basis the compliance has been defined?)
- Proposal of rewording Section Required Action:
1 paragraph only: 18/24 months after effective date of this AD, remove the non compliant belts (list of non-compliant belts to be provided in Appendix)

Then an AMOC section stating that new belts and belts repaired by authorised repair organizations are N/A

EASA response: acknowledged

FAA regulations are different from the EASA rules but in both cases the organisation carrying out seat belt repair/overhaul has to be in possession of an appropriate set of applicable maintenance data to be able to release the repaired/overhauled parts accordingly.

It is impossible for EASA to know all repair stations and or affected seat belt P/Ns and as such it is the only feasible way to have the operator to carry out a check if affected seat belts would be installed on their fleet.

The seat belts or restraint systems from manufacturers currently named on the PAD were the ones installed on seats certified according to CS2X.562. However, if equipment from a different manufacturer would be found in the future the AD would have to be superseded by EASA.

Basically all kind of seat belts and torso restraint systems for passenger and/or crew could be affected, under the conditions specified in the AD "Applicability" section.

In addition to the information already provided by PacSci in the PAD, the final AD contains information released by all restraint system manufacturers named in the AD.

The AD compliance time was decided on the basis of the potential risk, combined with EASA forecast of delivery times needed by restraint system manufacturers and authorized repair stations to replace restraint systems non-compliant with the AD requirements.

An AMOC section is not necessary because the AD is not applicable to new or correctly maintained/repared safety belts and torso restraint systems.

Commenter 22: LTB Schlemann – Dieter Schlemann – 24/12/2012 and 03/01/2013

Comment # 22

Sent on 24/12/2012

Wir lehnen eine AD zu Ihrem Entwurf der PAD 12-151 ab und fordern sie hiermit auf, auf eine AD zu verzichten.

In der PAD 12-151 beziehen Sie sich auf eine Untersuchung, die von Ihnen nicht veröffentlicht und nicht belegt wurde.

Das halten wir für unseriös.

Um glaubhaft zu sein, müssen Sie nachprüfbare Fakten vorlegen, und wenn Sie das nicht können, dann lassen Sie alles bleiben wie es ist. So lange Sie die Untersuchungsergebnisse nicht veröffentlichen, überzeugen Ihre Behauptungen nicht.

Auch gab und gibt es keine Beanstandungen. Da Sie Ihre Behauptungen, die überholten Gurte wären unsicher, nicht belegen, halten wir diese für falsch. Und weil Sie es nicht belegen, müssen wir davon ausgehen, dass Sie es nicht belegen können.

Demnach kann also von einer unsachgemäßen Instandsetzung auch keine Rede sein.

Solche Behauptungen müssen Sie durch einen unabhängigen Sachverständigen belegen können.

Beim Einbau und bei den jährlichen Nachprüfungen in und an den Flugzeugen wurden auch keine Fehler festgestellt. Es wird

also kein Gurt versagen. Sie produzieren durch eine entsprechende AD nicht mehr Sicherheit, sondern bürden den Haltern nur mehr Kosten auf. Auch das ist unseriös und unnötig. Nach Selbstauskunft der Hersteller hat keiner der Hersteller sich bei Ihnen beschwert oder eine Anzeige erstattet. Ganz gravierend ist, dass die von Ihnen erwähnte Firma Davis Aircraft Products Co. über keine Gurte, die mit einem 16g Sitz getestet wurden, verfügt. Hier stimmen Ihre Behauptungen schon mal nicht. Aus Erfahrung wissen wir, dass derartige ADs wie die von Ihnen geplante, nach einer gewissen Zeit nicht mehr beachtet werden, und die AD läuft ins Leere. Auch können Gurte, die ohne Hersteller -Instandsetzungsunterlagen überholt wurden, nur schwer identifiziert werden. Und überholte Gurte, bei denen das alte Label wieder aufgenäht wurde, werden nicht erkannt.

Sie verursachen mit einer AD nur überflüssige Kosten und Streit. Wir sind der Meinung, dass ausgelieferte Gurte, die mit einem EASA FORM ONE überholt oder repariert wurden, ihre Lufttüchtigkeit behalten und weiterhin in den Flugzeugen verbleiben sollten.

Es gibt keine Beweise, dass diese Gurt unsicher sind. Sie sind keine Gefahrenquelle. Unserer Meinung nach sollten Sie sich, anstatt an einer AD zu arbeiten, besser überlegen wie Sie die Gurtüberholung und das REWEB einvernehmlich regeln können (und das so regeln, dass das Geld in Europa bleibt). Über eine DOA geht es nicht. Die FAA hat es geregelt und das wird von Ihnen ja auch anerkannt. Jetzt kann und muss die EASA zeigen das sie flexibel ist.

Sent on 03/01/2013

Betr. der geplanten AD zur PAD 12-151 erlauben Sie uns bitte noch den Hinweis, dass bei der Überprüfung einer erlaubten Instandsetzung, alleine aus einer EPA-Kennzeichnung, nicht erkannt werden kann, ob sich um eine Erlaubnis für Gurte an 16 g Sitze handelt oder nicht. Wenn Sie das nicht eindeutig regeln, kommt genau das heraus was Sie eben nicht wollen. Nämlich unerlaubte Instandsetzung.

EASA response: not accepted

As explained in the “Reason” section of the AD, various certification tests involving seat belts with different webbings had been performed also in the frame of recent STC projects concerning seat belt replacement on dynamically tested seats. It became evident that different webbing material properties may have a detrimental influence on occupant protection as well as structural integrity of the seat- seat belt system.

Since the technical details of the above tests are proprietary data of the STC holder EASA cannot reveal more details.

The manufacturer Davis Aircraft Products is one of the restraint system suppliers for a major European operator having in their fleet large aeroplanes of types A330, A340 and A380. The combinations of seats-, seat belts and the attachment on cabin floor on those aeroplanes are qualified dynamically in accordance with JAR/CS25.562.

In both systems (FAA and EASA) an organisation carrying out seat belt repair/overhaul has to be in possession of an appropriate set of applicable maintenance data to be able to release the repaired/overhauled parts accordingly. The Technical Implementation Procedures (TIP) of the bilateral agreement between the USA and EU contains provisions for accepting dual release certificates (8130-3, EASA Form 1).

Please refer also to EASA response to comment #1 in this CRD.

Response to comment from 03/01/2013;

Per EASA part 21 marking requirements it is not necessary that the EPA marking on a seat belt or torso restraint system would indicate whether it is capable to be installed on a 9g or 16g seat.

The installer of a seat belt or torso restraint system needs to have the appropriate data (e.g. Service Bulletin) from the design organisation who designed the repair. If the EPA marked seat belt would be installed on a 16g seat correctly there would need to be an additional marking on the seat structure (close to the seat identification plate) where a reference to the EPA seat belt P/N or the applicable Service Bulletin is given.

This additional marking on the seat structure is the indication that the EPA seat belt has been assessed to be acceptable for installation on that specific seat P/N.

The additional marking on the seat structure is not considered necessary for 9g tested seats (static seats).

No changes have been made to the Final AD in response to this comment.

Commenter 23: Gerhard Pachowsky – 26/12/2012**Comment # 23**

1. Der Agentur ist sicher bekannt, dass ein deutscher Sicherheitsgurt-Instandhalter mit Part 145 Anerkennung über viele Jahre bis zum heutigen Tag den textilen Teil (webbing) von Sicherheitsgurten austauschte und so die weitere Nutzung der Sicherheitsgurte bis zu einem erneuten fälligen Austausch des textilen Teils der Sicherheitsgurte ermöglicht. Für die instandgesetzten Sicherheitsgurte wurde von dem Sicherheitsgurt-Instandhalter eine EASA Form 1 ausgestellt, die ein Release to Service gemäß Part-145.A.50 beinhaltet. Die Authorisierung zur Ausstellung der EASA Form 1 wurde dem deutschen Sicherheitsgurt-Instandhalter durch das Luftfahrt-Bundesamt der Bundesrepublik Deutschland erteilt.
2. Der Einbauer und Nutzer der so deklarierten Sicherheitsgurte genießt Vertrauensschutz nach deutschen Recht d.h. er kann auf das vertrauen, was in der EASA Form 1 ausgewiesen ist nämlich das „Release to Service“. Dies bedeutet, dass kein Anlass besteht, die von dem deutschen Sicherheitsgurt-Instandhalter instand gehaltenen Sicherheitsgurte nicht weiter zu benutzen.
3. Eine Stilllegung bzw. der Austausch vorgenannter Sicherheitsgurte gemäß den im Abschnitt „Required Action (s) and Compliance Time(s) der PAD 12-151 genannten Fristen wäre nur dann zu akzeptieren, wenn die Sicherheitsgurte nachweislich nicht den technischen Anforderungen entsprechen, die zum Zeitpunkt der erstmaligen Verwendung der Sicherheitsgurte gültig waren (z.B. CS 23.562).
4. Darüber hinaus ist es für den Nutzer der Sicherheitsgurte nicht relevant, ob die „Repair Station/Maintenance Organisation“ für das „Rewebbing“ eine Authorisierung des „Design Apporval Holders besitzt oder auch nicht. Die Nichtanwendung dieser Forderung kann nicht dazu führen, dass alle durch Sicherheitsgurte-Instandhalter bearbeiteten Sicherheitsgurte technisch unbegründet vorzeitig, d.h. vor dem Ende der vorgegebenen Betriebszeit stillzulegen sind.

5. Dadurch, dass das Luftfahrt-Bundesamt der Bundesrepublik Deutschland dem deutschen Sicherheitsgurt-Instandsetzer eine Genehmigung Part 145 erteilt hat, und dieser die von ihm instandgesetzten Sicherheitsgurte entsprechend dem vom LBA anerkannten Handbuch zur Qualitätssicherung bearbeitete, wäre für diese Sicherheitsgurte nur bei erkannten technischen Mängeln eine EASA AD gerechtfertigt. Begangene formale Fehler, wie das in der PAD 12-151 genannte „approval by the design approval holder“ sind bedauerlich, jedoch ungeeignet als Begründung herangezogen werden für den Austausch der Sicherheitsgurte an den ca. 12000 betroffenen deutschen Luftfahrzeugen und dem dann einhergehenden volkswirtschaftlichen Schaden von mehr als € 3 000 000.

6. Die Agentur wird gebeten, in die geplante AD den vorgenannten Sachverhalt einzuarbeiten.

EASA response: not accepted

1. *The oversight for production- as well as maintenance organisations is the responsibility of the National Aviation Authority (NAA) of the country where the organisation is located. In the frame of standardisation audits carried out by EASA after 2009 it was found that in some countries the regulations of EASA part 21 were not entirely followed. The LBA did react accordingly and withdrew for some organisations the authorisation of seat belt repair/overhaul based on the fact that those companies were not in possession of current applicable maintenance data as required by EASA part 21. Pending final decision of the withdrawal some companies did continue their practice and released seat belts with an EASA Form 1.*
2. *After issuance of the AD the operators as well as the installer have to remove the affected seat belts from their a/c within the compliance time given by the AD. The parts are officially declared not airworthy by the AD and as such the EASA ruling supersedes any national law.*
3. *If it could be proven (e.g. by testing) by the installer, operator or the organisation who issued the EASA Form 1 that the affected seat belts would comply with the requirements of the type certification basis of the aircraft on which they are installed, then the seat belts could be considered acceptable. The AMOC process could be pursued accordingly.*
4. *As explained in the PAD it is not necessary that the repair/overhaul would have to be carried out by the OEM or an OEM authorized organisation. Refer also to EASA response to comment #12 in this CRD.*
5. *Refer also to EASA response to comment #9 in this CRD.*
6. *Refer also to EASA response to comment #1 in this CRD.*

No changes have been made to the Final AD in response to this comment.

Commenter 24: HELOG AVIATION – Wolfgang Zagel – 27/12/2012

Comment # 24

Als Operator wir lehnen eine AD zu Ihrem Entwurf der PAD 12-151 ab und fordern sie hiermit auf, auf eine AD zu verzichten.

In der PAD 12-151 beziehen Sie sich auf eine Untersuchung, die von Ihnen nicht veröffentlicht und nicht belegt wurde.

Das ist nicht nachvollziehbar und erscheint auch nicht sehr seriös, solange keine nachprüfbaren Fakten vorgelegt werden. Dies scheint nicht möglich zu sein daher fordern wir sie auf, den alten Zustand, der bislang keinerlei sicherheitsrelevante Defizite hatte, so zu belassen.

Ihre Behauptungen, die überholten Gurte wären unsicher, können sie nicht belegen und wir halten diese für schlichtweg falsch.

Wir haben bisher noch keine Gurte von zugelassenen Überholungsbetrieben Solche Behauptungen müssen Sie durch einen unabhängigen Sachverständigen belegen

können.

Beim Einbau und bei den jährlichen Nachprüfungen in und an den Flugzeugen wurden auch keine Fehler festgestellt. Es wird also kein Gurt versagen!!!

Sie produzieren durch eine entsprechende AD nicht mehr Sicherheit, sondernbürden den Haltern nur mehr Kosten auf. Das ist leider gängige Praxis der EASA. Wir haben erfahren dass hat keiner der Hersteller sich bei Ihnen beschwert oder eine Anzeige erstattet hat und dass sie offensichtlich mit falschen Behauptungen agieren. Das ist strafbar, auch eine EASA hat sich an Recht und Gesetz zu halten und nicht mit Wild West Methoden zu agieren!

Sie verursachen mit einer AD nur überflüssige Kosten und Streit. Wir sind der Meinung, dass ausgelieferte Gurte, die mit einer EASA FORM ONE überholt oder repariert wurden, ihre Lufttüchtigkeit behalten und weiterhin in den Flugzeugen verbleiben sollten.

Es gibt keine Beweise, dass diese Gurte unsicher sind. Sie sind keine Gefahrenquelle. Es gibt daher keinen Grund, aus reiner Gschafflhuberei und vielleicht Beschäftigungsmangel neue Verfahren einzuführen. Diese belasten die ohnehin schon weit über das notwendige Maß hinaus belastete General Aviation auf ein weiteres.

EASA response: not accepted

Please refer to EASA response to comment #9 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 25: Aero-Club of Switzerland – René Meier – 27/12/2012

Comment # 25

We think in an open market where competition brings best results and better products aircraft owners should have a free choice to re-web the belts of the aircraft, provided of course the safety standards are maintained. All companies should have the opportunity to demonstrate the safety levels of their products, the Agency should set the standards and allow any manufacturer to meet those, not just the OEM.

In doing so costs could be kept down, a sound competition could be maintained, and a level playing field could be created.

EASA response: acknowledged

Please refer to EASA response to comment #1 in this CRD.

No changes have been made to the Final AD in response to this comment.

Commenter 26: KLM – Maarten Lammers – 09/01/2013

Comment # 26

Despite the fact that the official consultation period is closed, which I unfortunately missed due to the christmas holidays, I would still like to react on subject PAD for the following reason:

Looking at the applicability description of subject PAD, it describes that a future AD will be applicable to : “All part numbers of safety belts and torso restraint systems installed on any aircraft where dynamically tested seats are required in accordance with Certification Specifications (CS) para. 23.562, 25.562, 27.562 and 29.562.....”.

When looking at the Type certificate Data Sheet of the Fokker F28 mk 070 (TCDS No. EASA.A.037 issue 03), page 30 under “elect to comply”, it describes that: “Passengers seats are dynamically tested in accordance with JAR 25.562(b), (c)(4), (c)(7) and (c)(8) at Change 13 (not applicable to floor structure and seat tracks)”.

The above information shows that the floor structure and seat tracks will not be able to withstand inertia forces under 16G dynamic crash conditions. In this case, elongating seatbelts will not be the main problem, because complete seats will become detached from the aircraft structure. For this reason KLM Cityhopper does not agree with subject PAD and we therefore propose to remove the Fokker F28 mk 070 from the applicability of subject PAD, because it is not fully compliant with all requirements of JAR 25.562.

I hope you will still be able to review my comments. Thank you in advance.

EASA response: not accepted

Please refer to EASA response to comment #14 in this CRD.

No changes have been made to the Final AD in response to this comment.