


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-010 [Published on 16 January 2013 and officially closed for comments on 13 February 2013]

Commenter 1: Aer Arann – William Murphy – 11/2/2013

Comment # 1

Having reviewed EASA PAD 13-010, Aer Arann note with interest that the proposed AD advises that it has been issued due to a concern that dual distribution valve performance has a potential impact on the pneumatic de-icing system efficiency, which could reduce flight safety in icing conditions.

While Aer Arann are not directly impacted, as none of the listed part number/serial number combinations that the PAD is applicable to are installed on our ATR fleet, we have had significant reliability issues with dual distribution valve part number B03AA1040. This part is installed on ATR72-212A aircraft. On a fleet of 4 aircraft, Aer Arann had had 40 occasions which required valves of this part number to be replaced in order to clear reported defects over the past 4 years. Aer Arann has been in continuous communication with both the Type Certificate holder and the unit OEM on this issue, providing data on all events, removals, shop findings etc. There has been no such reliability issue on our ATR42-300, ATR72-201 or ATR72-212 aircraft.

Taking into account that ATR dual distribution valves are now the subject of a proposed AD, can EASA please advise if the scope of this PAD shall remain limited to the listed part number/serial numbers listed and the particular issue detailed, or will it be expanded to take account of the overall performance of other ATR dual distribution valves.

Considering the statement in the PAD about the potential impact on flight safety, Aer Arann are interested to know if EASA are of the opinion that a continuous reliability issue on the same part number would also constitute a potential impact on flight safety or not.

EASA response:

EASA disagrees.

The issue addressed by PAD 13-010 is the correction of a non-conformity in some DDV units. This discrepancy may generate a lack of efficiency in the de-icing cycle without being notified to the flight crew through system alarm. The criticality of the de-icing function alteration, together with the lack of warning for the crew, justifies this mandatory corrective action.

Regarding the safety aspect of the failures the commenter experienced in its fleet, it is noted that all the DDV failures evoked were reported to the flight crew through a system alarm [EASA assumption], thus enabling the flight crew to apply the appropriate procedure and to continue the flight safely. In addition, as to the defect described in PAD 13-010, ATR and the DDV manufacturer (Liebherr) had no in-service or shop finding records of a previous similar case. Liebherr also confirmed that, when the valve crimping fails, this is detected on the Liebherr repair test bench. Should the commentator know about DDV failures which have not triggered any pilot warning, please inform ATR Continued Airworthiness Service (cf. AD remarks section).

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