


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-110 [Published on 29 July 2013 and officially closed for comments on 26 August 2013]

Commenter 1: Sabena Technics – Gerrit Pronk – 05/08/2013

Comment # 1

Sabena Technics – Brussels is performing engineering activities for TNT Airways / Panair operated BAe 146 146-2/-3 Freighter aircraft. On their behalf and before the closing of consultation on 26 August I would like to give some comments on EASA PAD n°13-110.

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Applicability: BAe 146 and AVRO 146-RJ airplanes, all models, all serial numbers.

History ;

EASA AD 2012-0184, which covered the initial inspection ISB 53-239 which were done on the TNT / PANair fleet within the calendar backstop period of 6 months with Nil FINDINGS. And in advance of the publication of ISB 53-239 Revision 1 BAe systems approved TNT / Sabena Technics to carry out the above floor skin land inspection in advance of publication of ISB 53-239 Revision 1 on the following aircrafts (E2056, E2112 & E3166) which were in their C-check period, resulted with NIL FINDINGS and E3150 will be done during “C-check” in August.

The essential for us is that all other aircrafts could be done in their next C-check, meaning we would need more that 6 months time after effective date of the AD . 1000 cycles from effective date of AD, which we consider to be the most important parameter, wouldn't be a problem at all.

Proposal for inspection threshold;

Sabena Technics would like to propose that the inspection threshold is modified from 1000 Fc / 6 months wof after the effective date of AD to 1000 Fc / 12 months after the effective date of AD.

Or in some cases a “WAIVER” could be granted, for example for the TNT / PANair fleet for which C-check campaign is from December till September approx.

EASA response:

Not agreed. We have reviewed the proposal and while we accept that an extension to the calendar compliance period would assist in scheduling the inspection into the aircraft maintenance programme there is a need for this inspection to be carried out within six months. This six month period was the subject of specific discussion during the development of the proposed AD and was considered to be a good compromise between the need for the

inspection to be conducted as soon as reasonably practicable while still allowing the operators some flexibility as to when they should schedule the inspection into the aircraft maintenance programme. As a result of the comment the six month period has been reviewed again but it is still considered to be the best compromise period.

Commenter 2: Avalon Aero – Paul Harding – 20/08/2013

Comment # 2

With regards to EASA PAD 13-110 for the revised rear fuselage skin and frame inspections IAW BAE ISB 53-239R2, I currently manage 2 separate BAE 146/RJ fleets which are both on approved (LUMP) Low utilisation Maintenance Programmes, will there be any consideration taken for this type of operation with regards to the compliance criteria for the additional inspection requirements detailed in the BAE ISB. As it stands this will involve either positioning the aircraft to a suitable MRO or contracting in an “on-site” specialist in order to carry out these inspections as they are now likely to fall mid base check.

EASA response:

Not agreed. The response to Comment #1 is also applicable to this comment. In addition it is not considered that aircraft on low utilisation maintenance programmes should be treated differently to the rest of the fleet. The whole aircraft fleet is aging and there is a need to conduct the initial inspections in the relevant areas within the six month period.