


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-111 [Published on 30 July 2013 and officially closed for comments on 27 August 2013]

Commenter 1: Cobham Aviation Services – Davide Alleva – 05/08/2013

Comment # 1

- 1) PAD13-111 refers to RUAG TLMCM Temporary Revision TR05-05. This TR has been cancelled in 2006 and not in 2011. TR05-05 was embodied into 05-22-00 Zonal inspection programme (which is not an airworthiness limitations section) with a 1200FH inspection interval and no calendar limit. Subsequently this interval has been reduced to 600FH by Temporary Revision 05-34 (still valid).
- 2) PAD 13-111 refers to RUAG TLMCM as a manual containing mandatory actions for continued airworthiness. The TLMCM contains airworthiness limitations only within section 05-05-00, all other sections are not airworthiness limitations therefore the AD should only make reference to 05-05-00
- 3) Although AD D-2005-438 mandates the inspection of overhead panels 5VE and 6VE, TLMCM 05-05-00 does not list this inspection. The only inspection listed on the TLMCM is a zonal inspection (TR 05-34 refers) behind overhead panels 5VE and 6VE every 600 FH, this is not an airworthiness limitation.
- 4) The intent of PAD 13-111 is not clear: is the PAD a straight forward supersedure of D-2005-438 (hence applicable to overhead panel 5VE and 6VE only), or is it to make sure the tasks identified within TLMCM 05-05-00 airworthiness limitations are incorporated in the approved maintenance programme and identified as such? If so, is this a terminating action? (we already identify ALI in our maintenance programme, based on the TLMCM 05-05-00)
- 5) Following on item 2 and 4, the required action field of the PAD should only refers to TLMCM 05-05-00 ALI; as it reads at the moment, it is making the whole TLMCM (including non ALI sections) subject to the AD.

EASA response:

- 1) Disagreed, it may happen from time to time that a TLMCM is supplemented by a TR. Mentioning “TLMCM” automatically means “TLMCM including all valid TR’s”.**
 - 2) Disagreed, although the limits given in other sections than 05-05-00 are no authority (EASA) approved airworthiness limitations, it is necessary to adhere to them in order to avoid the development of unsafe conditions. An AD can use all references necessary to describe the problem and the necessary corrective action. AD references by their nature are not restricted to documents covering authority (EASA) approved airworthiness limitations, only.**
 - 3) Disagreed, references to the necessary measures (detailed in AMM) are given in TLMCM 05-22-10 respectively TR 05-34. An AD can use all references necessary to describe the problem and the necessary corrective action. AD references by their nature are not restricted to documents covering authority (EASA) approved airworthiness limitations, only.**
 - 4) Disagreed, the intent of the PAD is described under “Reason” at the bottom of that subchapter. It is a terminating action for EASA AD D-2005-438.**
- No changes have been made to the Final AD in response to the above 4 comments.**

5) Partially agreed; the Final AD has been amended to include a reference to “Zone 321 overhead panels 5VE/6VE” at the beginning of the “Required Actions...” section.