EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-169 **[Published on 19 November 2013 and officially closed for comments on 17 December 2013]**

Commenter 1: Camp Europe sas – Gaëtan Audevard –19.11.2013

Comment # 1

I'm writing you because of a confusion inducted in the EASA AD 2010-0226 and that we can maybe avoid in the supersedure release (PAD 13-169).

To give you the context :

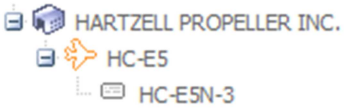
I'm part of a company that provide an aircraft maintenance tracking software and services. Our software, like almost competitors today, allow to manage your propellers in a separate profiles so that you can remove/install props from/to any aircraft and the prop data follow from one aircraft to the other.

Where the issue is :

- The EASA AD 2010-0226 & PAD 13-169 are written for the Piaggio P.180 & P.166 in terms of applicability.
- In terms of tracking software, it is logically supposed to be tracked within the airframe data. Operators, CAMO, inspectors are expecting for it, such as (within the airframe data).
- Technically, this EASA AD impact on the propellers and with an Hartwell supporting document. Moreover, it is tracked in propeller operating hours. For these reasons it have to be enrolled within the propeller data.

In other words we have an AD that technically have to be set on the propeller data, but, logically expected on the airframe data.

Why not addressing this unsafe condition with an AD that would be applicable to Hartzell Propeller Inc. HC-E5N-3 when installed on Piaggio P.180 and P.166?



I believe this is all a question of State of Design responsibility where a HC-E5 AD would need to be released by the FAA but the unsafe condition have been reported by Piaggio under EASA supervision?

Is there a legal possibility for the EASA to release an AD for a Hartzell model that is supposedly under FAA SoD supervision? But this would be enforceable in Europe only, is it the issue?

Do we have any idea why the FAA does not release its own AD that would be enforceable over the world?

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EASA response:

Noted.

The reason for having the AD in the aeroplane although mainly affecting the propeller is the fact, that it is an installation issue (use as pusher) and by that under the direct responsibility of Piaggo under the supervision by EASA. The Service Bulletin of Hartzell is to be seen as a supporting document.

Commenter 2: Piaggio Aero Industries S.p.A. – Carlo Cardu – 21.11.2013

Comment # 2

Following my first comment, here below you can find a further one:

AD 2010-0226, to be superseded by new AD, included a note to authorize pilots to perform the blade cleaning, in accordance with P145 (see below)

New PAD does not have it.

This note is extremely important for P180 operators, to ease operation of the aircraft.

To our knowledge, there are no reason to remove the alleviation of allowing crew members to perform the blade cleaning; we suggest to add a similar note in the new AD.

NOTE 3: the blade cleaning required at paragraph (1) of this AD may be

performed by appropriately trained and authorized flight crew members in

accordance with Part 145 provisions.

EASA response:

Agreed. Note 3 re-added in the AD text.

Commenter 3: Compagnia Aeronautica Italiana S.p.A. – Stefano Trevisan – 21.11.2013

Comment # 3

A:

Page 2 of 3 top of the page “For the reasons, described above, this AD retains the requirements of EASA AD 2013-0226, which is superseded.

I guess is not EASA AD 2013-0226 but EASA AD 2010-0226 like in page 1 of 3.

EASA response:

Agreed. Reference on superseded AD corrected

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B: Another comment on Note 1 present on page 2 of 3, almost for the P180 Avanti and Avanti II cannot be possible any synchronization of the required inspections with other required maintenance. This must be considered like an out-of-phase task only.
EASA response: ***Noted. Except for the comment EASA has no information on the possibility (or not) of any synchronisation of maintenance tasks. Since Note 1 allows some flexibility within a usual range for the operator, and no hazard has been developed out of that since first issue of the AD, it is sensible to keep it in the AD.***

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