


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14-025 [Published on 30 January 2014 and officially closed for comments on 27 February 2014]</p>

Commenter 1: JAPAT AG – Martin Hermansson – 19.02.2014

Comment # 1

I have read the EASA PAD 14-025 and I don't understand why you are planning on releasing an AD on this issue.

Dassault released an SB calling out for replacing the springs, no later than the next A-inspection. This is only applicable for aircrafts that have already performed the C inspection.

For all other aircrafts, the task to replace the springs was implemented in chapter 05-10 under the C-inspection, see picture.

25-10	COCKPIT				
25-11-13-640-801 25-100	GREASING OF THE PILOT SEAT ACTUATOR ROD END-FITTINGS	1 B			
25-11-19-960-801	REPLACEMENT OF THE PILOT SEAT LOCKING PIN SPRINGS	1 C	A/C with (P/N 132050-103 or P/N 132050-113 or P/N 132051-103 or P/N 132051-113 or P/N 1421320-17 or P/N 1421321-17)		For A/C which have not performed this replacement during their last C check at the reception of revision 3 of this document, comply with the first replacement no later than the next A check unless SB F900EX-446 has been complied with.
25-11-25-200-801 25-105	INSPECTION OF THE PILOT SEAT ROLLER PINS	1 C			
25-12-00-210-801	GENERAL VISUAL INSPECTION OF THE THIRD CREW MEMBER SEAT	2 A	A/C with third crew seat	SUPPL ICA	

Since the release of this SB, more than 1.5 years ago, a lot of more aircrafts have performed the C-inspection and replaced the springs in accordance with the C-inspection package, based on chapter 05-10.

If you release this AD, it will become applicable for a lot of aircrafts that have already performed the task to replace the springs during their C-inspection.

This AD will have an financial impact and will cause a lot of confusion among us operators.

There is already a fix in place so I really don't see the necessity of an AD like this.

EASA response:

Comment understood. However, it is to be noted that, in the reference Dassault Aviation SB F900EX-446, this SB calls for the “Replacement of the Pilot Seat Locking Pin Springs” task 25-11-19-960-801. Under this condition, required actions by this AD can be considered as already accomplished when either the SB or the maintenance task are performed. Then compliance with this AD can be directly logged in the aeroplane logbook.

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