


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-027</p> <p>[Published on 30 January 2014 and officially closed for comments on 27 February 2014]</p>

Commenter 1: Glasfaser Italiana S.p.A. – Andrea Pellicoli – 31.01.2014

Comment # 1

My opinion is that this PAD 14-027 DOES NOT FIT as well as written

REASON

In my opinion this change of pulleys is an improvement to be considered for Parts department: I mean, Lindner GmbH should discharge the plastic pulleys from his store, so no new plastic pulleys should be available.

I am working in Glasfaser Italiana SpA (EASA Part 145 n° IT.145.0062) since 2006, as technical office and maintenance support, and since 2009 as CAMO office too: I never get a replacement of pulleys due to cracks, but only to worn.

The pulleys does not undergo a very intense strength.

Usual customer or flight clubs are since 2010 really in economic difficult

SUGGESTION

issue an AD as following

- all models indicated in PAD14-027
- action : at next 100h/annual inspection, whichever occurs first, check type of pulleys (plastic or metal)
- if plastic, heavy check to discover if cracks existing
 - a) no cracks, repeat check every 100h or 1 year
 - b) cracks, replace plastic with metal pulleys
- replacing of pulleys for any reasons only with metal type
- no more plastic pulleys availability, and discount of 50% for everyone that send back plastic pulleys as new from his own stock to replace with new type, valid until 2015.
- customer choice to replace plastic pulleys if not cracked

EASA response:

EASA disagrees with the comment.

According to TC Holder information, one has to differentiate between two different plastic materials, a white material and a brown material. Nearly all white plastic pulleys which have been checked showed cracks of different length and have to be removed. The results of the checks of the brown pulleys are not as clear as for the white plastic pulleys. But also in this case cracks are possible.

According to the TC Holder, the owners of affected sailplanes have no problems with the exchange of the pulleys.

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

Commenter 2: Civil Aviation Authority of New Zealand – Owen Olls – 09.02.2014

Comment # 2

In the 'Reason' of the proposed AD you state 'Plastic cable pulleys may also be installed in the cable circuits of pedal adjustment and/or tow hook actuation, their replacement is not required by this AD'.

From the above statement I understand the AD will not mandate replacement of plastic pulleys in the cable circuits of pedal adjustment and/or tow hook actuation. Please advise the justification for this decision?

Will a pulley failure installed in the cable circuits of pedal adjustment and/or tow hook actuation not result in a loss of rudder control?

EASA response:

EASA disagrees with the comment.

Out of factory the pulleys are covered by a closed cable cage. Therefore, danger of jamming is limited even if the pulley breaks completely. The plastic pulleys in the cable circuits of the pedal adjustment and the tow hook actuation are located in the secondary control. Normally the pedal adjustment is operated on the ground. The cable to operate the pedal adjustment is only used to disengage the pedal adjustment. To move the pedal back one has to pull the cable or to hold the cable and push the pedals with ones feet. Securing the pedals in the new position is done automatically by a spring.

Thus, even if the pulley breaks this will not result in a loss of rudder control.

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