


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14.034 [Published on 06 February 2014 and officially closed for comments on 06 March 2014]</p>

Commenter 1: Air Contractors – Darren O'Regan – 20/02/2014

Comment # 1

My one comment on this PAD is in relation to the exact wording in Row A of Table 1 of this PAD.

The current wording from the PAD is "Before next MLG overhaul after the effective date of this AD".

I believe the use of the word "before" leads to ambiguity, as this could be interpreted that the relevant MBD SB's listed in paragraphs 3, 4, 5 & 6 of the PAD must be accomplished prior to the next MLG overhaul but not during the next MLG overhaul.

I believe the intent of this PAD is to accomplish the relevant MBD SB's listed in paragraphs 3, 4, 5 & 6 of the PAD during the next scheduled MLG overhaul, so may I suggest the alternate wording for Row A "The next scheduled MLG overhaul after the effective date of this AD"

EASA response: Partially agreed.

The Row A of table 1 'Compliance Time' will be amended in order to propose a deadline beyond which identification and replacement of the pins, targeted by paragraphs 3, 4, 5 & 6, must be accomplished.

In the final AD, the Row A of table 1 'Compliance Time' will be replaced by : 'No later than the next MLG overhaul scheduled after the effective date of this AD'

Commenter 2: Nordic Aviation Capital A/S – Brendan Hoare – 05/03/2014

Comment # 2

In response to the consultation process for this pad we have the following comments.

- Section "Reason", mentions that other pin P/N's have been identified that could be affected but no details or reference to other data is provided to deal with any non conformance related to these other P/N's
- Section "Required Actions and Compliance Times", not all of the Service Bulletins listed are available to fully understand what pins are affected
- Section "Required Actions and Compliance Times", Table compliance within 20,000 flight cycles or 9 years is confusing because the TBO for ATR 72-200/212A are not in line with the limits in Table 1B
- Section "Required Actions and Compliance Times", concerns about the practical application of the replacement program by the OEM may lead to supply

delays and aircraft being grounded because of the lack of useable spares.

EASA response:

a) Disagreed.

The other affected pins having such a variety of P/N, and name designation, that it is been decided to not exhaustively list them through the 'Reason' section, as well as in the Required Actions and Compliances Time' section.

EASA intention, behind this choice, was to get two groups for which associated requirements and compliance time have been defined.

Those 'other P/N' (different from the rear hinge pin P/N D61000) are identified through the dedicated Messier SBs.

b) Agreed.

The two last Service Bulletins listed in the PAD (without issuance date) could only be available in draft version during the consultation process.

EASA try to minimise, as much as possible, this kind of inconvenience.

However, for this particular case, the compliance time is deemed 'wide' enough to give the operators time, from the AD publication, to review the SBs contents and comply the AD requirements.

c) Disagreed.

20000 FC is consistent with the 9 years of operations (based upon average yearly cycle accumulation), and not with the MLG TBO. This latitude, compared to the published 18000 FC TBO, introduces *de facto* a grace period (circa. 10%) to limit requests for potential TBO extension/escalation.

d) Disagreed.

Industrial constraints have been considered and specific dispositions have been taken into account in closed cooperation with MLG manufacturer.