

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-041 [Published on 19 February 2014 and officially closed for comments on 19 March 2014]

Commenter 1: Aer Arann – William Murphy – 26/02/2014
Comment # 1

Aer Arann have reviewed the content of EASA PAD 14-041 concerning production issues on ATR42 and ATR72 fuel probes and have a number of comments.

1. Can EASA confirm that complying with the content of this proposed AD will not compromise the CDCCL integrity of an aircraft?

A practical example of this is if an ATR72 aircraft has a probe currently installed (i.e. prior to the effective date of the AD), with a part number and serial number listed in table 1, but has ATR Mod 04686 embodied, then per the PAD, no action is required. However, the operator is now aware that there is possibly an issue with the integrity of the probe. It would be reasonable to interpret the description in the PAD of the issue (...loss of ground connection on the terminal block of the fuel probe, due to an incorrect application of wiring instructions in production...) as a defect which could impact on the CDCCL integrity of the unit, and therefore compromise the CDCCL integrity of the aircraft. Aer Arann accept that a risk analysis or equivalent has been performed which allows continued use of installed affected probe part number serial number combinations as long as an independent fuel low level detection system is installed. Nevertheless, Aer Arann request clarification that compliance with the PAD in the above scenario would not compromise compliance with the requirements of CDCCL.

2. Aer Arann request that the AD includes reference to the OEM approved data (CMM/Component SB etc) which adds the suffix “C” control tag on the probe serial number.

EASA response:

- 1- ***Noted - The CDCCL aspect, and potential impact, has been considered during the technical investigation. The aircraft manufacturer has confirmed that no safety issue other than the one described in the PAD reason section was expected. The technical issue does not compromise compliance with the requirements of CDCCL.***
- 2- ***Agreed – PAD will be amended accordingly.***