

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-172 [Published on 12 December 2014 and officially closed for comments on 09 January 2015]

Commenter 1: Azul Linhas Aéreas Brasileiras – Paulo César Chaves – 15/12/2014

Comment # 1

Regarding the step 2 into the REQUIRED ACTIONS AND COMPLIANCE TIME, AZUL Brazilian Airlines request you the possibility to have at least 3 FLIGHT CYCLES, due a wide fleet and a country dimension (Brazil).

AZUL have a MRO at SBBH and a maintenance hub at SBKP.

And the best to AZUL in order to accomplish this corrective actions, if necessary, will be at the MRO.

EASA response:

Noted – This request deals with an operational matter, and then has to be instructed with the State of Registry of the concerned aircraft.

No change in the AD wording.

Commenter 2: Stobart Air – William Murphy – 17/12/2014

Comment # 2

Stobart Air have reviewed the content of PAD 14-172, and are of the opinion that there is an issue with the structure of the “Required Action(s) and Compliance Time(s)”, and how it relates to aircraft that were not previously subject to the requirements of EASA AD 2013-0280.

In relation to ATR72 aircraft, the proposed AD lists applicability as ATR72-212A aircraft, on which ATR mod 6517 has been performed in production, but ATR mod 7294 has not been embodied in production.

In the “Required Action(s) and Compliance Time(s)” section, paragraphs 1, 2 and 3 restate the requirements of EASA AD 2013-0280, while paragraph 4 states a new requirement.

The applicability for EASA AD 2013-0280 was: ATR 72-212A aeroplanes, all MSN, on which ATR mod 6517 has been embodied in production, except MSN 1089, 1094, 1095, 1097, 1098, 1099, 1100, 1101 and 1102, and except those aeroplanes on which ATR mod 7152 has been embodied in production.

Paragraphs 1, 2 and 3 of the PAD are restating the requirements of EASA AS 2013-0280, but these were in effect only applicable to post production aircraft. Aircraft

which had the intent of the AD performed during production, demonstrate compliance by means of concession or mod 7152.

However, for aircraft which had the AD addressed in production, the PAD as it currently stands does not allow for compliance with paragraphs 1, 2 and 3 by the same method as 2013-0280.

For paragraphs 1, 2 and 3, the PAD does not differentiate between aircraft which had the AD complied with during production, and those which were subjected to the AD post production.

Stobart Air request EASA to amend the PAD in relation to paragraphs 1, 2 and 3 of “Required Action(s) and Compliance Time(s)”, and specify that these requirements apply to : ATR 72-212A aeroplanes, all MSN, on which ATR mod 6517 has been embodied in production, except MSN 1089, 1094, 1095, 1097, 1098, 1099, 1100, 1101 and 1102, and except those aeroplanes on which ATR mod 7152 has been embodied in production.

We would suspect that the same situation applies to ATR42 aircraft subject to this AD.

EASA response:

Agreement –

PAD 14-172 is not targeting the same aircraft population as EASA AD 2013-0280, therefore the applicability, as written, is confirmed.

However, it appears that the requirements (1) to (3), taken over from EASA AD 2013-0280, and repeated to keep a temporary measure in place until achieving the required final fix, have introduced some confusion.

Therefore, it is proposed to amend the current wording of PAD 14-172 Required Action(s) and Compliance Time(s) section by precisising the applicability of the various requirements.

Commenter 3: Air Tahiti – YP SEUNG Raimana – 19/12/2014

Comment # 3

According to PAD 14-172, effectivity is defined as hereafter:

*ATR42-500 applicable to aircraft with MOD6518 and except aircraft with MOD7294.

*ATR72-212A applicable to aircraft with MOD6517 and except aircraft with MOD7294.

As PAD14-172 superseded AD-2013-0280, could you please advise if the correct reference is “except aircraft with MOD7152 instead of except aircraft with MOD7294”.

EASA response:

Disagreement – ATR Mod 7152 was a modification embodying a temporal fix (temporary measure), whereas the ATR Modification 7294 introduces a final fix (terminating action) –refer to Reason AD section.