

COMMENT RESPONSE DOCUMENT

CAA PAD No. 1991

[Published on 22 December 2021 and officially closed for comments on 19 January 2022]

Commenter 1: Company name – commenter's name – date

Comment # 1

1. The proposed compliance times should be amended to reflect possible changes to the periodicity of the World Magnetic Model; whilst the current Epochs are now set at 5 years, the unpredictable nature of magnetic polar movement may lead to early or delayed WMM publication in future. We suggest that the compliance requirements at paragraphs (1), (2) and (3) should therefore be amended to read at their beginning:

“Within 3 months of the effective date of this AD, and, thereafter, on issue of a new World Magnetic Model or at intervals not to exceed 5 calendar years (whichever occurs soonest) ...”

CAA response:

CAA agrees with the comment. The AD text will be amended to include the text; “*Within 3 months of the effective date of this AD, and, thereafter, on issue of a new World Magnetic Model or at intervals not to exceed 5 calendar years (whichever occurs soonest) ...*”

Commenter 2: Company name – commenter's name – date

Comment # 2

2. Additionally, we recommend that the PAD includes a requirement for affected aircraft to be updated with present-day MagVar values on change of operator by sale or by lease arrangements in excess of 3 months, unless being withdrawn from service. The rationale for this is to reduce the size of the affected fleet, and to limit oversight requirements and

mitigate against the transfer of a potentially unsafe condition to parts of the world where MagVar changes since 1990/1995 may have been more significant than in the UK.

CAA response:

CAA partially agree. Though we agree completely with the intent of the comment, it may not be feasible to update this data in the IRU. Consequently, the AD has been amended to state; *“Should the operator of an affected aircraft change, either by sale or by lease arrangements in excess of 3 months, then the operator should comply with paragraphs (1), (2), (3), and (4) of this AD, or be updated with present-day MagVar values, before further flight.”*

Commenter 3: Company name – commenter’s name – date

Comment # 3

3. On a minor note, the PAD requires operators “to comply with paragraph (1),and (5) below” but it does not include a paragraph (5).

CAA response:

CAA agree with this comment. Text has been amended to state; *“to comply with paragraph (1),and (4)”*

Commenter 4: Company name – commenter’s name – date

Comment # 4

4. Lastly, we note that the PAD refers purely to AVRO 146-RJ aeroplanes. It is suggested that consideration be given to the issuance of a broader AD to cover all platforms using legacy MagVar data.

CAA response:

CAA partially agree with this comment. We will proceed with this AD for the AVRO 146-RJ and at the same time we will consider if other aircraft types for which UK are the State of Design could be subject to issues relating to legacy MagVar data.