

COMMENT RESPONSE DOCUMENT

CAA PAD No. 1987

[Published on 17 February 2022 and officially closed for comments on 17 March 2022]

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

Comment # 1

I am contacting you with regards to PAD 1987. We have a doubt on the new requirement of this AD for the termination action. When is mentioned on the PAD " Within 12 months or at the next scheduled service whichever occurs latest after the effective date of this AD". It can be implemented on the next schedule C check even if later of 12 months?
Thank you in advance

CAA response:

CAA acknowledged this comment but no changes to the text were deemed necessary. The interpretation is correct in that, for the terminating action, the modification and re-identification of the seat can take place more than 12 months from the date of the AD, to coincide with the next scheduled service. This is on the basis that the scheduled inspections, at 750FH continue, until such time that the terminating action is completed.

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

Comment # 2

The Operations Engineering Bulletin (OEB) mentioned in the **Credit** paragraph and **Reference Publications** no longer exists. Indeed, the content of the OEB (requiring seat adjustment) has been directly integrated in the normal ATR procedures as it should be a normal practice. Therefore, my proposal would be to reword the **Credit** paragraph (as shown below):

From:

For affected seats installed on ATR aeroplanes only: If, during any inspection as required by paragraph (1) of EASA AD 2018-0262, any damage or incorrect installation of only one affected spring (as identified in the inspection SB) is found on the pilot or co-pilot seat, it is allowed to defer

accomplishment of the corrective actions as required by paragraph (2) of this AD for that seat by up to 10 calendar days, provided a copy of the ATR Operations Engineering Bulletin (OEB) “Untimely Pilot Seat Unlocking” is included in the applicable Aircraft Flight Manual, pilots are informed, and the aeroplane is operated in accordance with the instructions of that OEB.

To:
For affected seats installed on ATR aeroplanes only: If, during any inspection as required by paragraph (1) of EASA AD 2018-0262, any damage or incorrect installation of only one affected spring (as identified in the inspection SB) is found on the pilot or co-pilot seat, it is allowed to defer accomplishment of the corrective actions as required by paragraph (2) of this AD for that seat by up to 10 calendar days, **the aeroplane is operated in accordance with the instructions of AOM 42/72/2018/04 issue 5.**

And to mention the AOM in the **Reference Publications** instead of OEB.

AOM 42/72/2018/04 issue 4 is the current latest issue and issue 5 is currently being written. Please find enclosed the draft issue 5 which contains the wording below:

If, during any inspection, any damage or incorrect installation of only one spring is found on the pilot or co-pilot seat, it is allowed to defer accomplishment of the corrective actions for that seat by up to 10 calendar days, provided that:

- Pilots are informed
- Before each takeoff and landing, and after each adjustment of the seat, the pilot ensures that the seat is correctly locked in a secure position.

If you agree with this proposal, we would release AOM issue 5 prior CAA AD release.

For your information, this proposal has also been discussed with EASA stakeholders who are in copy.

CAA response:

CAA accepts the response in principle. References to the OEB have been removed. Reference to the AOM has been made following concurrence by the EASA who are the State of Design regulator for the ATR 42 and 72 aeroplanes.

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

Comment # 3

On this subject, it must be noted that for aircraft ATR 72, ATR has issued SB 72-25-1207, now at revision 01, which gives instructions to modify the affected seats in accordance with applicable IPECO service bulletins.

Given that the IPECO SBs are component SBs, the reference in AD only to the component SBs seems to restrict making the modification of the seats other than in specialized shops, which subsequently would increase the costs for making the modification.

Is this the intent of the future AD or the AD will also make reference to the TCH SB(s)?

{operator] is already modifying the affected seats using the ATR SB as a reference.

CAA response:

Following discussion and agreement with ATR and EASA, reference is made to “applicable aircraft Type Certificate Holder Service Bulletin or AMM which reference the IPECO Service Bulletins.” to address the concern of this comment regarding inadvertently limiting the performing of corrective actions to specialized component rated workshops.