

COMMENT RESPONSE DOCUMENT

CAA PAD No. 1999

[Published on 14 June 2022 and officially closed for comments on 12 July 2022]

Commenter 1: EASA – 21 June 2022

Comment # 1

This PAD, like most, contains the wording “Required as indicated, unless previously accomplished”, which gives an implied credit for ANY action as required by the AD, already accomplished before the effective date of the AD.

Paragraph (6) of the PAD gives credit for exactly the AMM Revision (95) that is required by the AD. This kind of credit paragraph is redundant because of the statement quoted above.

CAA response:

CAA agrees with this comment. The CAA have reviewed the Credit section and have identified that this TC holder does not publish ‘compliance times’ (grace periods) within their ALI publication. The Credit section has been deleted.

Commenter 2: EASA – 28 June 2022

Comment # 2

The Table A in Appendix 1 provide all the new tasks introduced by this AD. The table indicates MRBR tasks which seems to me confusing as the MRBR is not mandated by AD, only the ALS. Can this be clarified?

CAA response:

CAA agrees with this comment. Text has been added to explain that reference to MRBR tasks is for information only.

New AD text:

“Additionally it should be noted that Table A includes reference to MRBR ITEM No & MRBR SSI No. The MRB Item Numbers are only included for reference, as the ALLs in the CAA mandated AMM 05-10-17 are replicated in the ATP MRBR Appendix E.”

Commenter 3: EASA – 28 June 2022

Comment # 3

The Table A in Appendix 1 provide all the new tasks introduced by this AD. In addition the new task associated with SSI 52-33-101C is not included in this table. The PAD describes there is a new task coming from this SSI, but the task is not described anywhere. Can you please check it?

CAA response:

CAA agrees with this comment. The word ‘new’ has been replaced.

PAD text:

“Note: SSI 52-33-101C is new. The following SSIs have been updated and reissued to include more restrictive inspection requirements:...”

Revised AD text:

“Note: SSI 52-33-101C is amended with a reduced threshold and a reduced repeat interval. The following SSIs have been updated and reissued to include more restrictive inspection requirements, (inspections were, Detailed Visual Inspections and are now NDT):”

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

Comment # 4

The Table A in Appendix 1 provide all the new tasks introduced by this AD. It might be necessary to reflect on which ALS of the AMM chapter 05, changes are performed (Structure ALL...)

CAA response:

CAA disagrees with this comment. The CAA consider that both within the Reason section and Required Action(s) and Compliance Time(s) section, the AD identifies that the changes relate only to SSI Chapter 05-10-17.