



PAD/CESSNA 400/92 Amdt 2 was published on 28 March 2017 and was closed for comments on 28 April 2017.

Commenter 1

Comment: “My only issue here is in the compliance section.

We have 400 series Cessna’s here that operate as RPT aircraft. As such they don’t have a maintenance release (MR) or a maintenance release inspection.

Most MR’s in Charter aircraft run for 200 hrs. As such adding a compliance period of 200 hrs for RPT aircraft would be equivalent.

No greater than 210 hrs would allow some flexibility”

CASA Response: The compliance will account for this scenario. An initial inspection within 220 hours (200 hours + 10% tolerance) will be accommodated for parts that have already accumulated 1,000 hours or 3 years since new, to allow time to schedule the initial inspection. A new proposed AD, dedicated to only inspecting the J&R fitting - PAD/CESSNA 400/120 will address this.

Commenter 2

Comment: Due to the possibility of fitting preload stress being introduced when replacing fittings, perhaps a note on install fit/preload/shimming in the AD would assist the industry.

CASA Response: Comments regarding the fitting preload being a factor are noted. A note will be added to the AD about caution here.

Commenter 3

Comment: The submitter provided a marked up copy of the AD including clarification of diagrams and part numbers and also questioned the maintenance release interval.

CASA Response: There will also be a direct reference to the IPC so there is no confusion about which fitting is being inspected. A picture of the actual failed fitting is retained for clarity.

Also, we will be removing reference to maintenance release. The new interval will align with the current Cessna SIDS inspection of this area, affording maintenance convenience.

A new proposed AD, PAD/CESSNA 400/120 will address this.

Commenter 4

Comment:

“Having done a number of F&DT compliant approvals of repairs / rework in this area (generally arising from SIDs inspections), I offer the following comments:

- A. The AD should be absolutely clear as to which side of the joint should have the fitting inspected - stating the carry through side (centre), or the wing / outboard side, or both. I realise there is a fitting part number listed which will actually identify the part, however adding this clarification removes the requirement for the LAME to cross-match the IPC and potentially misidentify the fitting (this is compounded by issues listed in my Point B below).
- B. Figure A seems to show an outboard wing fitting (from a Cessna 310?) which will be confusing compared to Figure B (an inboard fitting), despite the attempt to indicate a sectional view in the Figure A caption. The parts are different. A correct photo or illustration of the actual fitting (preferably in-situ) should be used (or actual cross-hatched figure if a sectional view is really desired).”

CASA Response: The AD has been clarified to identify the part to be inspected, via direct IPC reference. A new proposed AD, PAD/CESSNA 400/120 will address this.

Commenter 5

Comment: “The JR Aerospace fitting pictured in the PAD is a replacement for 0811350-x however the illustration (figure A) in the PAD and the AD/ CESSNA 400/92 is that of 0822550. (IPC references are attached). To find a crack in the area of the one in the photo you would need a torch and mirror or borescope to see it with the wing fairing missing. Looking in the wheel well only gives access to the 0822550 fitting”.

CASA Response: A new proposed AD, PAD/CESSNA 400/120 will address this

Commenter 6

Comment: “I have an issue with the re-inspect intervals in PAD/Cessna 400/92 Amdt 2. As a Part 42 Operator, we no longer use a Maintenance Release. Currently, we are carrying out the repeat requirements each 200 hours as that was the validity of our previous MRs and coincided with our 200 hour inspection cycle. This also presents a problem in that now, under the AMP for the aircraft, the 200 hourly can be extended by up to 20 hours. For our operation, the most effective repeat interval would therefore be 220 hours”.

CASA Response: We have removed reference to next/subsequent maintenance release in the AD. The AD interval has been adjusted to align with the Cessna SIDS inspection of this area. There is a transitional provision of 220 hours (one typical maintenance cycle with 10% tolerance) for fittings that are already beyond the 1000hr/3 year initial inspection threshold.

Commenter 7

Comment: "I noticed that this PAD uses the maintenance release inspection as a limitation.

I suggest that the maintenance release interval is not the best option as a limitation. Some of the main reasons include:

- (1) A maintenance release interval is not a fixed interval.
- (2) The maintenance release concept doesn't exist in Part 42
- (3) The maintenance release concept may not exist in the future continuing airworthiness regulations."

CASA Response: We agree with the response, the AD will use a fixed hourly interval for threshold and repeat inspections which will be aligned with the existing SIDS inspection of the area.

Commenter 8

Comment: "We recommend that CASA develop a new airworthiness directive for all J&R fittings (both wing and fuselage side) and do not revise the existing airworthiness directive Cessna 400/92. The Cessna 0811350 fittings are not included in the original airworthiness directive. Based on the comments made in the background section about material and manufacturing processes as well as the review of recent SDRs, it appears that all J&R fittings need to be inspected more often than Cessna produced fittings to assure continued airworthiness".

CASA Response: We agree with this response. CASA AD/CESSNA 400/92 will not be revised. A new AD will be developed – PAD/CESSNA 400/120 which will cover the inspection of the J&R fitting P/N JRA-445-1 exclusively, to avoid confusion about which fittings are being inspected.