



Airtourer Co-operative Ltd.

P.O. Box 778
Tewantin QLD 4565

15th June 2015

Manager, Airworthiness and Engineering Standards
GPO Box 2005
Canberra ACT 2601

Reference A: Proposed Airworthiness Directive PAD/PROP/1 Amdt 3 April 2015

Dear Sir,

I am writing on behalf of the Airtourer Co-operative Ltd. regarding the proposed amendment 3 at reference A.

The Airtourer Co-operative holds the Type Certificates for the Airtourer series of aircraft and is responsible to various NAAs for the continuing airworthiness of the type. The Co-operative does not mandate inspection, maintenance and overhaul intervals for propellers but rather refers owners to Airworthiness Directives and the manufacturers recommendations.¹

Nevertheless, the Co-operative has been approached by a number of members with concerns over the apparently arbitrary nature of some of the requirements in Reference A.

The "Background" paragraph of Reference A states that the amendment is required due to information from the CASA Service Difficulty Report system. The Summary of Proposed Change accompanying the PAD gives a little more information citing amdt 2 failing to keep aligned with manufacturers TBO recommendations and misunderstandings regarding calendar time. Unfortunately the detailed information that would allow the industry to provide informed feedback was not supplied. In particular, the data and logic that has led to the intervals and requirements of Appendixes 1 and 2.

If industry wishes to make changes to approved data such as maintenance requirements it is required to provide detailed justification based on supportable and relevant data. It is appropriate that CASA hold themselves to the same standards and allow industry the opportunity to critically review the data and logic. CASA is fortunate to have the services of highly capable engineers, however by reason of numbers alone, the industry also has broad and deep experience. Unfortunately the lack of sufficiently detailed information to support this PAD does not allow CASA to benefit from this talent pool.

Considering the lack of supporting data, the Airtourer Co-operative believes the consultation period needs to be extended while that data is released allowing the industry to provide informed feedback and possible alternative means of compliance.

Yours Faithfully,

John O'Halloran.
Chairman, Airtourer Co-operative Ltd.

¹ Airtourer Maintenance and Repair Manual, AL 2 Jan 2010, para. 5a-00.1