

From: [McCully, William \(FAA\)](#)
To: [Jose, Gideon \(FAA\)](#); [Showers, David R \(FAA\)](#); [Wessley, Scott \(FAA\)](#); [Reyer, Michael \(FAA\)](#)
Cc: [Underwood, Christina \(FAA\)](#); [Capezzuto, Rob \(FAA\)](#); [Noles, Gregory \(FAA\)](#); [Spiegel, Corey \(FAA\)](#)
Subject: RE: Docket No. FAA-2018-1046 - PA-28 Main wing spar crack
Date: Friday, February 01, 2019 7:03:51 AM
Attachments: [image001.png](#)
[image002.png](#)

All but comment #4 are duplicated in comments already received to the docket as of yesterday. The topic of #4 was discussed /resolved during the CARB meetings.

Dan McCully

Airframe Branch, AIR-7A1
Atlanta Aircraft Certification Office
404.474.5548

From: Jose, Gideon (FAA) <Gideon.Jose@faa.gov>
Sent: Thursday, January 31, 2019 5:02 PM
To: Showers, David R (FAA) <David.R.Showers@faa.gov>; Wessley, Scott (FAA) <scott.wessley@faa.gov>; Reyner, Michael (FAA) <michael.reyer@faa.gov>
Cc: Underwood, Christina (FAA) <Christina.Underwood@faa.gov>; Capezzuto, Rob (FAA) <Rob.Capezzuto@faa.gov>; Noles, Gregory (FAA) <Gregory.Noless@faa.gov>; Spiegel, Corey (FAA) <Corey.Spiegel@faa.gov>; McCully, William (FAA) <William.McCully@faa.gov>
Subject: FW: Docket No. FAA-2018-1046 - PA-28 Main wing spar crack

Dave, Scott,

We received the following from our EASA counterpart today submitting their comment to us regarding the Piper wing spar crack AD. From their submission they wanted to have a "working level" discussion based on the TIP and BASA. Based on ex-parte requirements, I believe we cannot technically have the conversation that they are requesting, but I wanted to check with you to make sure that this is the case. As a note it appears from the e-mail that they are not planning to put their comments officially in the docket. We look forward to your guidance.

Best regards,
Gideon Jose
Continued Operational Safety Program Manager
FAA Atlanta-ACO
404-474-5569

" We value your feed back. [Click here to send us your feedback.](#) "

CONFIDENTIALITY NOTICE: THIS E-MAIL TRANSMISSION MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, PROPRIETARY, SUBJECT TO COPYRIGHT, AND/OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IT IS FOR THE USE OF INTENDED RECIPIENTS ONLY. If you are not an intended recipient of this message, please notify the original sender immediately by forwarding what you received and then delete all copies of the correspondence and attachments from your computer system. Any use, distribution, or disclosure of this message by unintended recipients is not

authorized and may be unlawful. Thank you for your cooperation.

From: FICO Stefano <stefano.fico@easa.europa.eu>
Sent: Wednesday, January 30, 2019 9:47 AM
To: Noles, Gregory (FAA) <Gregory.Noles@faa.gov>; Jose, Gideon (FAA) <Gideon.Jose@faa.gov>
Cc: william.mccully@faa.gov; 'hans.kellner@austrocontrol.at' <hans.kellner@austrocontrol.at>; Goudie Andrew <Andrew.Goudie@caa.co.uk>; REICHEL Manfred <manfred.reichel@easa.europa.eu>; airworthiness directives <ADs@easa.europa.eu>
Subject: Docket No. FAA-2018-1046 - PA-28 Main wing spar crack

Dear Keith, Gideon,

EASA has reviewed the proposed NPRM in subject and has some concerns regarding the implementation of the related actions in EASA member states. Details are in the comments below which have been coordinated with NAAs of UK and Austria, as Authorities responsible for the oversight of the implementation of the AD in their respective states. Furthermore, we have had the chance to review the attached letter provided by Piper.

At this stage we are sharing our comments only with the FAA PMs for Piper and we would like to have the chance to discuss them at working level in the spirit and boundary of the EU-US TIP and BASA (we do not plan to provide them through the comment tool in the Docket):

1. The proposed NPRM method for assessing the usage of the aeroplanes using “100 hour” inspections data does not appear to work in EASA member states (and possibly elsewhere in the world except US). EASA will need to propose some form of a different approach and would seek to coordinate such an approach with Piper / FAA. The “100 hour” inspections can be part of a maintenance programme of airplanes not necessarily used as “severe”.
2. EASA notes inconsistency between the two formulas SB 886 & 978A compared to that proposed in the AD (where training is now considered severe); EASA seeks further justification of the NPRM formula and whether this will reliably determine inspections for the most fatigue damaged aircraft that are most likely to be prone to potentially catastrophic cracking.
3. Further to the remarks above, has FAA considered whether the scope of the AD could be initially limited to those models / types with a higher stress level as proposed in the attached piper letter (more GAG, operation off unpaved runways, higher stress levels, high loads usage e.g.- operation below 100’ AGL such as patrolling, pipeline surveys). We understand Piper may support to narrow a selection of more exposed models.
4. Can FAA confirm whether it is sufficient to only inspect only the two most outboard spar lower bolt holes as currently proposed? in the old Piper SB the inspection was done on all the spar to centre section lower joint bolt holes, and given the nature of fatigue scatter it appears possible that cracking may exist further inboard on the

lower spar that will not be detected and may then grow to failure prior to further inspections?

5. Considering also that the removal and subsequent reinstallation of the spar bolts required to provide access for the inspections can introduce additional damages causing premature fatigue cracking thereafter, EASA would like to ask if such risk has been balanced with the safety risk behind this AD (criticality and mostly probability – see also comments 3). EASA would advise that such inspections are performed carefully to a process that meets with Piper recommendations, (additional reference Piper SL 997 may be suitable?).

Thanks in advance for your attention. We remain at disposal should any further clarifications be required on the comments above.

Best Regards

Stefano Fico

Senior PCM – Initial Airworthiness General Aviation & RPAS
European Aviation Safety Agency

Tel.: +49 221 89990-4355; **Mobile:** +49 151 46704280

Postal: Postfach 10 12 53, 50452 Cologne, Germany
An agency of the European Union 

This message is intended for the use of the addressee only and may contain information that is privileged and confidential. If you are not the intended recipient, you are notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by returning this e-mail. This communication does not constitute any formal commitment on behalf of the European Aviation Safety Agency (EASA).