

February 9, 2010

Protest over EASA PAD No. 10-010

Comments from the Board of the Danish Powered Flying Union

The board of Danish Powered Flying Union (DMU) must strongly object to the EASA PAD No. 10-010 due to the following reasons:

- Normally EASA task is to ensure safety in European aviation, but with this PAD EASA is doing the exact opposite, because there is no evidence that shows, that there is any safety problems with the safety belts that is effected with this PAD
- The safety belts was released into services with a Form One
- The companies that is effected by this PAD has maintained the belts under this authorization for many years
- There hasn't been any change in the safety belts, and the quality of the belts, it is just the rules that have changed backwards
- The Luftfahrtbundesamt (LBA) in Germany has audited the companies affected by this PAD and EASA has audited LBA without any findings

In Denmark there are approximately 1.000 Danish aircraft owners, of small airplanes, that are effected by this PAD. And it is unrealistic that the manufactures of safety belts are able to produce enough new belts to replace those and there likes in Europe.

Therefore will EASA with this PAD ground the majority of the fleet across Europe not to mention the cost for replacement of the belts. Approximately we are talking about 1,2 million Euros just in Denmark.

The Civil Aviation Administration in Denmark (SLV) released a BL1-1 the 20. December 2007 that stated that all safety belts in all commercial and private airplanes had to be replaced after respectively 10 and 14 years before 1. January 2009.

In an AIC released by SLV the 15. January 2009 the date was chanced to the 1 of April 2009.

And finally in an AIC released by SLV the 23 of March 2009, SLV gave a general exposure until further notice.

But by that time a lot of Danish aircraft owners had changed the safety belts due to the originally BL 1-1 and the first AIC from SLV.

Those aircraft owners are now in a position where it will cost large sums of money, and possible ground the aircraft for a longer period, just because they did what the Danish Civil Aviation Administration demanded and in good time, and therefore wasn't rescued by the last AIC from 23 of march 2009.

Those aircraft owners' safety belts were chanced to safety belts, which were released into service by a Form One from a company that was approved by the German Luftfahrtsbundesamt.

This PAD No. 10-010 from EASA now puts these aircraft owners in a situation where they have

followed the Danish Civil Aviation Administration, in good faith, but by doing so they are going to pay because EASA make rules backwards, and not only forward, although there are no safety reasons to consider.

The board of Danish Powered Flying Union must therefore strongly object to this PAD and ask EASA to give the companies, and aircraft owners, affected by this PAD time to correct this problem - if there is any at all – instead of just require replacement of safety belts that are likely perfectly safe.

And if EASA think there is safety problems at least inspect a percentage of the belts, from each of the companies affected by this PAD, and if there isn't any indications of safety problems, release the belts back into service. But please do this before EASA are grounding a large percentage of the airplanes in Europe.

Best regards
Danish Powered Flying Union



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