



GADRINGER GURTE GMBH



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TOP URGENT CUSTOMER INFORMATION

(February, 4th, 2010 - update)

EASA (P)AD 10-010 to maintenance of aviation safety belts

Dear Ladies and Gentlemen,

on Jan., 13th, 2010 the EASA announced a (P)AD, you can find the announcement under the following internet-link <http://ad.easa.europa.eu/ad/10-010>.

First of all:

the mentioned document is at the moment not a valid AD, which means it is an proposed draft with a **public comments dead line till 10th of Feb. 2010.**

We believe there is no reason for action at the moment. Only if the EASA issues an AD it is time to act. If, when and in which scale the EASA will issue an AD can't be answered seriously.

The background of this (P)AD is the „EC Regulation 145.45“, which says, maintenance just has to be carried out by using OEM-maintenance-manuals. Concerning safety belts these data were not available. Therefore maintenance was done in accordance with procedures approved by the LBA (the German Aviation Authority).

**Our own products (manufacturer: Gadringer-Gurte GmbH),
overhauled in our company are not concerned !**

The publishing of this (P)AD suprised us completely, as just in November 2009 we were visited by EASA+LBA. The missing OEM-manual were criticized but they made no remarks about any security concerns. There were no limitations or what so ever outspoken to our work of maintenance of aviation seat belts. In general we do not understand this proposed procedure by the EASA as our approval in accordance to EASA-Part-145 is still valid until today without any changes and all maintenance was always made in accordance to our approval.

We believe this (P)AD is:

- imbalance:** as only belts of some selected OEM / producers are effected
- unfair:** as within Europe only 4 German producers are effected
- disproportional:** as more than 40 years we produce and do maintenance on safety belts **without any complaints** as such as of the material nor safety.

In particular the back dated invalidation of all our work done under a valid approval is totally unacceptable.

We recommend and ask you to urgently make use of the public comments possibility under the above mentioned link, as this is actual the only possibility of reaction to the content of the (P)AD or to make the EASA think over that situation once again.

For further questions do not hesitate to contact us at any time.

Petra Gadringer / Harald Müller
(Manager)