


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 13-064</b> <b>[Published on 08 May 2013 and officially closed for comments on 05 June 2013]</b>

**Commenter 1: HI FLY – Rui Cavaco – 09.05.2013**

**Comment # 1**

1. There could be a unnecessary circular reference on paragraph (5) (maybe it should be read “paragraphs (2), (3) and (4)” instead).
2. In order to improve readability on the entire document, “MLG uplock” could be referred to as “MLG leg uplock” (as seen on Reason details).
3. Regarding paragraph (3.1), we assume inspections to be carried out every 50 FC until an upper threshold of 1000 FC would apply only to those MLG leg uplocks spring pair(s) (see NOTE below) detected with one spring failed. However, the inspection is asked to be in accordance with paragraph (1) without conditions (i.e. all MLG/NLG leg/door uplocks).
4. Paragraph (4) addresses in detail the failure of both free fall springs on the same MLG/NLG leg uplock. Our current understanding is: if both MLG/NLG leg uplock hook springs are failed (or both MLG leg uplock lever springs are failed, if existing) would result in MLG/NLG leg uplock replacement before next flight.

By omission, please clarify the allowable damages that can be covered by paragraph (3) on MLG/NLG concerning hook springs and lever springs (if existing on MLG leg uplock).

**NOTE:** for A310 aircraft, in accordance with SB A310-32-3147 R1 and VSB 470-32-880 R1, our understanding is that it would be acceptable to have, at the same time, one failed lever spring (if existing on MLG leg uplock), one failed hook spring and one failed free fall spring, ensuring that paragraph (3) conditions are met for subject MLG/NLG leg uplock(s).

5. Paragraph (6) could be incomplete, whereas the wording usually requires that Revision 1 of each SB reference would have to be used after the effective date on the final AD.
6. Concerning the requirements of VSB 470-32-880 R1, called by SB A310-32-3147 R1, paragraph 3.A.(2) NOTES could be incomplete/incorrect in terms of P/N numbering systems noted for RH MLG leg uplocks, because the following P/Ns may not explicitly covered by any of those systems:

A25452001  
A25452001-1  
A25452001-2  
A25452001-3  
A25452002-1  
A25452002-2  
A25452002-3  
A25454001

**EASA response:**

***Item 1: EASA agrees and accepts this comment, the final AD is updated accordingly.***

***Item 2: EASA agrees and accepts this comment, the final AD is updated accordingly.***

***Item 3: EASA agrees and accepts this comment, the final AD is updated accordingly.***

***Item 4: This comment is noted. The understanding is correct, a failure of one spring on each function on the same leg uplock (lever spring, hook spring and free fall spring) is acceptable.***

***Item 5: EASA disagrees and the comment is not accepted. Paragraph (1) of the Required Action(s) and Compliance Time(s) chapter, applicable from the effective date of the AD, requires the inspection of MLG and NLG uplock in accordance with SBs at revision 01. This paragraph cancels the need to mention in paragraph (6) SB revisions to be used after the effective date of the AD.***

***Item 6: EASA disagrees and the comment is not accepted. It concerns SB and VSB, not the AD. This comment has been transferred to Airbus for analysis outside this CRD.***