


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 12-016</b> <b>[Published on the 16 February 12 and officially closed for comments on the 15 March 12]</b>

**Commenter 1: Swiss International Air Lines Ltd. – Lukas Zuellig – 07.03.12**

**Comment # 1**

“Please find below SWR comments / questions related to PAD 12-016:

The main problem on the bogie pivot pin, which finally led to the release of AD 2011-0040 and now PAD 12-016 is caused over time of aircraft operation and MLG in service. So, to an operator, it would be more feasible to have an AD compliance time requirement on the MLG, not on an AD effective date. How the AD is currently set up, it just seems that Airbus / EASA / Messier-Bugatti-Dowty want to have all the inspection results within 26 months as soon as possible, even the possibility of any problems on new aircraft is very little.

Can EASA please explain why a compliance time based on the AD effective dates have been chosen instead of a MLG counter (FC/FH)?

Also in the same context:

Reading the EASA response to enquiries from AFR and DLH of the previous PAD 10-125, I read “..... a probability approach at A/C level was performed to define a threshold; this is the reason why the threshold is related to the A/C and not to the MLG...”.

Honestly I have some problems to understand this reason, I cannot fully see what EASA wants to tell with this statement. A more open explanation would be highly appreciated.”

**EASA response:**

***This issue is the result of a combination of several factors and is not linked to ageing, FC or FH. It is the reason why a probabilistic approach at aircraft level has been initially used to calculate the inspection threshold and interval which correspond to an acceptable risk exposure time.***

***No changes have been made to the Final AD in response to this comment.***

**Commenter 2: Lufthansa Technik AG – Elvio Damian Marinelli – 13.03.12****Comment # 2**

“The pivot pins as well as the concerned bushes are inspected during the Main Landing Gear (MLG) shop visit (overhaul) with the same or higher level which is being required by the maintenance instructions (SBs) listed in the PAD. Refer to flaw detection and corrective actions sections of applicable CMM.

EASA should take this into consideration when defines required actions as well as accomplishment timeframes.

For example, if inspection was carried out on an A/C in-service, whose MLGs have been later overhauled (or replaced with overhauled gears), the threshold for re-inspection should be 26 months counted from first flight after MLG overhaul.”

**EASA response:**

***We disagree. This AD is at A/C level and not at LG level (we refer in the AD to the A/C first flight and not the first flight of a part on an A/C).***

***This is because the threshold and interval are not based on any FC/FH or calendar limits. By having this regular check of the fleet we ensure an acceptable global level of safety.***

***No changes have been made to the Final AD in response to this comment.***

**Commenter 3: Deutsche Lufthansa AG – Brigitte Gilles – 20.02.12****Comment # 1**

Regarding the PAD 12-016 (Landing Gear – Main and Center Landing Gear Bogie Pivot Pins – Inspections) which was published February, the 16th 2012, Lufthansa have a comment to the upcoming AD.

Under Para (1) the Note describes, that an overhaul of the landing gear does not substitute the accomplishment of an inspection as required by paragraph (1) of this AD. But is it possible to take a note in the upcoming AD, that the accomplishment of the Vendor SBs A33/34-32-285, A34/56M-32-46 und A34/56C-32-117 are acceptable for compliance with the requirements?

**EASA response:**

***We disagree. The threshold and compliance time in the present AD are calculated at A/C level and are not valid at LG level (we refer in the AD to the A/C first flight and not the first flight of a part on an A/C).***

***No changes have been made to the Final AD in response to this comment.***