


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No.: 15-135</b></p> <p><b>[Published on 29 October 2015 and officially closed for comments on 26 November 2015]</b></p>

**Commenter 1: Lufthansa Technik AG – Stefan Spiesmacher – 29/10/2015**

**Comment # 1**

During the preparation of the accomplishment of Airbus SB A320-32-1429, which will be covered by your proposed AD, it proved difficult to obtain a sufficient and reliable supply of the material necessary for the accomplishment of the SB within the timeframe (72 months) stated therein. As the compliance time of 66 months stated in the AD is even shorter, the named difficulties may grow further. In the light that, according to the knowledge of LHT, no failure of a sidestay locking related to the design deficiency addressed by the PAD has ever occurred, we'd kindly ask Airbus and EASA to check whether the timeframe could be extended to ten years, which coincides with the scheduled overhaul of the affected landing gears. The modification campaign could then be accomplished in a way, which is far easier to organize, reducing the efforts for both the aircraft operators and MBD as the manufacturer of the affected parts significantly.

**EASA response:**

*Comment not agreed. The timeframe suggested by Airbus SB is 6 years (72 months) from June 2015; this timeframe was agreed with EASA, based on fleet risk and expected support capability from Airbus and MBD. The 66 months compliance time in the AD takes into account the time expired between the SB issuance and the AD issuance, and provides a requirement consistent with the initial assessment performed by EASA and Airbus. MBD SB, even if suggest accomplishment at LG OH, have a reference to Airbus SB suggested timeframe.*

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

**Commenter 2: easyJet Airline – Michael Foster – 29/10/2015**

**Comment # 2**

MBD VSB 200-32-315 states to perform this modification at OH or NSV, whilst the Airbus SB states an accomplishment timescale of 6 years, the PAD however states within 66 months of the effective date. Given that MBD, the design authority for landing gear components, under Compliance recommends the modification to be performed at OH, EZY believes that at the mandatory period should be at next MLG OH.

Given that there has only been one failure of this locking mechanism (that has been published), EZY would be grateful if EASA would consider this timescale.

**EASA response: Comment not agreed. See EASA response to Comment #1**

**Commenter 3: Sabena Technics Mir – Helmi Touel – 06/11/2015****Comment # 3**

According to VSB 200-32-315 (Apr 24/2015), Messier-Dowty recommends modification at overhaul or next shop (E. Compliance).

Same thing for VSB 201-32-63 (Apr 24/2015).

We suggest to take in account this recommendation.

We suggest a grace period for LDG having more than 66mo remaining for OVH.

**EASA response: Comment not agreed. See EASA response to Comment #1**

**Commenter 4: United Airlines – Tariq Siddiquie – 30/11/2015****Comment # 4**

United Airlines disagrees with EASA's recommended time of compliance of 66 months after the effective date of this AD. United Airlines recommends that EASA adopt a recommended time of compliance of "next shop visit" or 120 months after the effective date of the AD, whichever occurs earlier. This will be in line with the recommendations of Messier Dowty, the manufacturer of the landing gear on the A318/A319/A320 aircraft.

**EASA response: Comment not agreed. See EASA response to Comment #1**