



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-025

[Published on 18 February 2016 and officially closed for comments on 17 March 2016]

Commenter 1: Swiss International Air Lines Ltd. – Lukas Zuellig – 23/02/2016

Comment #1

- (A) The review of recently issued PAD 16-025 revealed some questions to be addressed to EASA / Airbus: [paragraph] (10) Is it correct that the terminating action is not mandated by proposed AD for MLG P/N 10-210?
- (B) It is correct that the repetitive inspection could remain in place even after a landing gear overhaul on a MLG P/N 10-210 on which the terminating action has not been performed?
- (C) What is the reason that SB A330-32-3268 or A340-32-4300 or optional terminating actions only?

EASA response:

- (A) Comment noted. It is correct that the terminating action for the repetitive inspection is not required for MLG 10-210.**
- (B) Comment partially agreed. If a MLG P/N 10-210 is replaced with a MLG P/N 10-210 that does not have an improved bogie beam, the repetitive inspections must be continued.**
- (C) Comment noted. For an aeroplane equipped with MLG P/N 10-210 series, it has been determined that the repetitive inspection regime is sufficient to address the unsafe condition. As for an aeroplane equipped with MLG P/N 201252 series or MLG P/N 201490 series, recent analysis indicated that the repetitive inspection regime is no longer sufficient, hence the need to require accomplishment of the terminating action.**

Commenter 2: Lufthansa Technik AG – Matthias Oechsle – 24/02/2016

Comment #2

- (A) Please consider the following comments on PAD 16-025 from Lufthansa Technik on behalf of DLH. Paragraph (8): This paragraph is not very precisely formulated. We assume this paragraph should state, “do the Terminating Action during the next overhaul”. Correct?
- (B) Paragraph (11): For us this paragraph means we are not allowed to install a Pre Terminating Action MLG after the effective date of the AD. This may result in big problems for some operators. The MLGs for Gear changes in near future may be already at the overhaul facilities and the facility may certify the overhaul before



AD effective date. But when the installation is planned after AD effective date installation of the MLG is not allowed anymore. In addition the overhaul facilities need some time to adjust their processes for bogie beam modification iaw. SB 32-3275 / 32-4305. A grace period of 6 month which allows installation of Pre-Modification MLGs after AD effective date would be an acceptable compromise.

- (C) Another point is a Pre-Modification Bogie Beam replacement, e.g. due to a hard landing or reaching life limit, after the AD effective date. Is an installation of another Pre-Modification Bogie Beam allowed, provided that this Bogie Beam has accumulated less than 126 month since its first flight or last overhaul? In case installation of a Post-Modification Bogie Beam is mandatory this may result in complete MLG change since there is the concurrent requirement for modification of the shock absorber.

EASA response:

(A) Comment partially agreed. This paragraph has been reformulated and now requires replacement of a MLG with an improved MLG.

(B) Comment agreed. In the revised PAD, paragraph (11) has been separated into 2 paragraphs. The new paragraph (11) addresses the condition for installation MLG P/N 201252 series or MLG P/N 201490 series and a paragraph (12) has been added to address the condition for installation MLG P/N 10-210. For all MLG configurations, for an aeroplane that is already modified (2 MLGs with improved bogie beam), it is not allowed, from the effective date of the AD, to install a pre-mod MLG. For an aeroplane that is not yet modified (2 MLGs without improved bogie beam), the same prohibition applies as soon as that aeroplane is modified, as required by paragraph (8), or as specified in paragraph (10), as applicable.

(C) Comment noted. On a pre-modification aeroplane, as long as the MLG has accumulated less than 126 months since first flight on an aeroplane after entry into service or after the last overhaul, a pre-modification MLG can be installed. However, operators must comply with the requirements of the AD to embody the terminating actions on the aeroplane, appropriately and within the applicable compliance times.

Commenter 3: Cathay Pacific Airways Limited – Bharat Yadav – 16/03/16

Comment #3

With regards to the PAD 16-025 CPA have the following comment:

Step (11) “From the effective date of this AD, do not install on any aeroplane an affected MLG unless it complies with the requirements of this AD.”

Suggest that in the case of unscheduled gear change that the following scenario should be allowed. No pre-mod MLG should be installed on aircraft that previously had post mod MLG installed. Please review and add the statement above to point 11 to ensure that this requirement minimise any potential operational impact due to no AD compliant replacement gears being available.

EASA response:

Comment agreed. See answer to Comment #2, point (B).

