



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-025R1

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Commenter 1: Air France – Baptiste Hericher – 10/05/2016

Comment # 1

The main reason for issued a new proposal Airworthiness Directive (AD) is the necessity to clarify some paragraphs however AFR would like some additional clarification:

- A. Is it allowed to install, after the effective date of the future AD, on pre-mod aeroplane, a pre-mod MLG P/N 201490 series, which has been overhauled in 2015?
- B. Is it allowed to install, on pre-mod aeroplane, a pre-mod MLG P/N 201490 series, which has been overhauled after the effective date of future AD (for example: modification not performed in shop due to kit not available)?
- C. The paragraphs 11.2 and 12.2 should be reformulated indeed if an aeroplane is modified as per paragraph 8, this one cannot be pre-mod 205289 or 204421, pre SB 32-3275 or 32-3268 or pre SB 32-4305 or 4300. If actions stated in paragraph 8 are applied, the applicable paragraphs will be necessarily 11.1 or 12.1.

EASA response:

- A. *Comment understood. It is confirmed that a pre-mod MLG P/N 201490 series overhauled in 2015 can be installed on a pre-mod aeroplane. Once the aeroplane is modified, as required by paragraph (8), pre-Mod MLG can no longer be installed on that aeroplane.*
- B. *Comment understood. It is confirmed that a pre-mod MLG P/N 201490 series overhauled after the effective date of this AD can, in principle, still be installed on a pre-mod aeroplane. However, Airbus informed EASA that from some time before the effective date of this AD, all MLG P/N 201490 which go in shop for overhaul are modified to post-mod configuration during that overhaul.*
- C. *Comment understood, but not agreed. Paragraph (11) provides conditions for pre-mod MLG P/N 201252 or P/N 201490 installation on an aeroplane. For aeroplanes equipped with these MLG P/Ns, the modification of these MLGs is required (see paragraph (8) of this AD). For an aeroplane that is already post-mod on the effective date of this AD, installation of a pre-mod MLG P/N 201252 or P/N 201490 on that aeroplane (effectively de-modifying the aeroplane) is not allowed – see paragraph (11.1) of the Final AD. For an aeroplane that is still pre-mod on the effective date of this AD, until it becomes post-mod (both MLG replaced with post-mod units), a pre-mod MLG P/N 201252 or P/N 201490 can still be installed on that aeroplane – see paragraph (11.2) of the Final AD. Similarly, for the optional modification of an aeroplane with MLG P/N 10-210 series per paragraph (10) of the Final AD (Airbus SB A330-32-3268 or SB A340-32-4300), including post-mod 204421 aeroplanes, de-modification is not allowed – see paragraph (12) of the Final AD.*

No changes have been made to the Final AD in response to these comments.

