



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-044

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Commenter 1: Lufthansa Technik AG – Mustafa Akkaya – 06/04/2018

Comment # 1

One intention of PAD 18-044 is to implement reduced life limits for affected MLG wheel axles. With implementation of the PAD 18-044 requirements we will have on some affected components an increment of the life limit in comparison to the ALS Part 1 requirement.

Is this really the intend of the PAD 18-044?

For example:

Affected Part- and Serial number combination:	P/N 201272649, S/N SER8832/02 equipped on A330-343 A/C with WV 052
Date of Repair as per SB A330-32-3282 R/I 03:	25.10.2006
MRO as per SB A330-32-3282 R/I 03:	MRO 002
Accumulated life time since new until repair (25.10.2006):	12735 FH, 1807 FC
Post Repair Life Limit as per PAD 18-044 Table 2:	75000FH, 50000 FC
Life Limit as per PAD 18-044 since new:	75000 FH +12735 FH, 50000 FC + 1807 FC > 87735 FH, 51807 FC
Life Limit as per A330 ALS Part 1 Rev. 9:	115000FH, 30000 FC

In comparison of the PAD 18-044 with ALS Part 1 Rev. 9 the Flight Cycle limit of PAD is substantial higher with 51807 FC than the ALS Part 1 limit with 30000 FC, which is in dissent to the intention of the PAD 18-044 to introduce reduced life limits.

Which life limit has to be applied for the mentioned Part- and Serial number configuration in this case? The life limit of PAD 18-044 with 87735 FH, 51807 FC or most restrictive of both requirements (PAD and ALS Part 1), which will be in this case with 87735 FH or 30000 FC?

Any clarification about this subject is highly appreciated.



EASA response:

Comment understood. Please note an important statement at the beginning of Appendix 1 of the Final AD. It is mentioned that regardless of the applicable post repair life limits as specified in all Tables of the final AD, the life limits as specified in ALS Part 1 can never be exceeded. In the case specified above, 87 735 FH or 30 000 FC, whichever occurs first, are the applicable life limits.

Paragraph (2) of the Final AD has been amended in response to this comment, emphasising that the applicable ALS limit(s) cannot be exceeded.

