

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-151

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Commenter 1: Iberia – Carlos Marjaliza Fernández – 01/08/2019

Comment # 1

Regarding the time requirement shown in PAD:

[...] Within 6 years after the **last known overhaul date** as specified in Appendix 1 of this AD [...]

Should we take as starting point the exact OVH date or can we take the installation date after last OVH? Is it possible to clarify this point?

As you know, Landing Gear OVH is calculated from installation date after last OVH. Therefore, some affected a/c can be repaired at OVH instead of during operation.

EASA response:

Comment not agreed. For this specific unsafe condition, the risk assessment determined that the compliance time for the replacement must start from the last known overhaul date which is specified in the final AD.

No changes has been made to the final AD in response to this comment.

