

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-068

[Published on 16 June 2023 and officially closed for comments on 30 June 2023]

**Commenter 1: Delta Air Lines, Inc – Michael D. Tharp – 27/06/2023**

### **Comment # 1**

#### Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 23-068, dated 16 June 2023
- (B) Airbus SB A330-32-3305 Rev 00, dated 22 May 2023
- (C) RDAF 81138823/003/2022 issue A
- (D) RDAF 81159105/003/2022 issue A

#### **Comment A**

##### Commenter Request

Table 1 of Ref (A), "MSN" is used as a table header for the aircraft serial number.

##### Request justification

Using "MSN" could cause confusion as the affected part may be installed on another MSN.

##### List paragraphs that change; describe (nonobvious) changes

DAL proposes to change the table header in Table 1 of Ref (A) from "MSN" to "originally installed on Aircraft MSN" as the axle may have been moved to a different MSN aircraft since delivery.

#### **Comment B**

##### Commenter Request

Ref (B) paragraph B.(2) of the Summary states that a terminating action can be achieved through the permanent repair as defined by CMM 32-13-25. Ref (A) paragraph (5) does not mention this terminating action. DAL proposed adding another section to Ref (A) paragraph (5) that states "Terminating action can be achieved through permanent repair of the axle, defined as per CMM 32-13-25"

##### Request justification

Ref (B) offers a terminating action that is not mentioned in Ref (A). Including the terminating action from Ref (B) in Ref (A) allows operators to cease repeat inspections and prevents operators from seeking a chargeable RDAS from SAFRAN for terminating the inspection using an already approved method.



List paragraphs that change; describe (nonobvious) changes

DAL proposes adding another section to Ref (A) paragraph (5) that states "Terminating action can be achieved through permanent repair of the axle, defined as per CMM 32-13-25"

**Comment C**Commenter Request

DAL requests a grace period for the initial inspection after the AD effective date.

Request justification

DAL has not completed Ref (C) or Ref (D). Without a grace period, this AD would ground 3 DAL A/C on the AD effective date.

List paragraphs that change; describe (nonobvious) changes

DAL proposes the following verbiage to Ref (A) paragraph (1): "The initial inspection is required to be completed "within 24 months after the part entry into service" or "24 months after the AD effective date, whichever is later"

**EASA response:**

**Comment 1A: Comment noted. While it has to be noted that the information is provided in the definition of "affected part" and "Groups", which are called in the Title of Appendix 1, EASA agrees to restate that information to prevent confusion. Final AD has been updated accordingly.**

**Comment 1B: Comment not agreed. Current CMM does not include yet that repair procedure. It is already expected that, when such repair will be included in the CMM, this AD will be revised accordingly.**

**Comment 1C: Comment not agreed. Existing data does not support a general extension of the compliance time as proposed. Final AD has been updated to allow using inspections accomplished iaw the RDAF listed in paragraph (2) of the AD, even after the effective date of the AD, as method to comply with the initial inspection requirement of the AD.**

**Commenter 2: Cathay Pacific Airways Ltd – Bharat Yadav – 30/06/2023****Comment # 2**

For AD effectivity please refer to the Modifications that

a. install Enhanced MLG to aircraft

OR

b. NEO MLG to aircraft



OR

c. NEO components to Enhanced MLG

Not all A330/340 can install the suspect components on their MLG, so would be exempt from the AD. The AD should be exact as to which aircraft and landing gear are affected by this quality issue specified in the AD. At the moment the AD is not exact in that regard.

***EASA response: Comment not agreed. Enhanced MLG can be installed on aeroplanes having specific mod installed in production, or service bulletin in service. Consequently, the AD has to be applicable to all MSN of those a/c models on which an enhanced MLG is eligible for installation (either mod or SB). For an MSN not having mod nor SB allowing installation of enhanced MLG embodied, the AD allows embodiment of that SB, provided affected parts are (and will be) not installed.***

***Eventually, it is EASA opinion that the proposed text (specifically, paragraph 7, which is the only one applicable to Group 2 aeroplanes) makes the AD simpler, identifying a single clear requirement.***

***For an MSN on which an enhanced MLG is not eligible for installation (e.g., relevant mod and SB not embodied), EASA consider that paragraph 7 can be logged as accomplished by reference to aeroplane mod and SB configuration, provided the NAA, in charge for AD enforcement, agrees to that approach.***

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

