

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-087R1

[Published on 24 November 2023 and officially closed for comments on 15 December 2023]

Commenter 1: Aer Lingus Limited – Sean Evans – 01/12/2023

Comment # 1

Ref PAD 23-087R1, EIN have 4 aircraft which have 'CIS' production mods embodied:

- A320-251N aircraft MSN 10712 – delivered in 2022 have mods 155374 and 153970 embodied at production. (Group 2 per the PAD)
- A320-251N aircraft MSN 10786 – delivered in 2022 have mods 155374 and 153970 embodied at production. (Group 2 per the PAD)
- A320-214 aircraft MSN 3789 – delivered originally in 2009 have mod 34650 embodied at production. Overhauled gear fitted in 2019 – see query below
- A320-214 aircraft MSN 3823 – delivered originally in 2009 have mod 34650 embodied at production. (Group 2 per the PAD due to having a new 'EV' NLG fitted in 2019)

EIN have reviewed PAD 23-087R1 and wish to query whether Landing Gear overhaul after 01 July 2018 should be considered as a terminating action for any repairs prior to 01 July 2018 which would require a review as the PAD is written currently.

For example, MSN 3789 has had its landing gears overhauled in 2019. The gears now fitted to that aircraft were not originally on 'CIS' aircraft so are these gears subject to the requirements of the AD/PAD?

Or is there a requirement to trace the gears which were delivered on MSN 3789 / 3823 and establish if they had any repairs performed prior to 01 July 2018 or does the overhaul on those gears satisfy any requirement of the AD/PAD?

EASA response:

Comment noted.

An NLG part (as listed in Table 1 of this AD) repaired after 01 July 2018 in accordance with Airbus or SLS repair instructions is considered to be a serviceable part. An aircraft, having mod 34650 embodied in production is considered to be a CIS aeroplane. A CIS aeroplane with an NLG part (as listed in Table 1 of this AD) repaired after the 01 July 2018 in accordance with Airbus or SLS repair instructions (serviceable part) is considered to be a Group 2 aeroplane. The purpose of the AD is to ensure that any repairs performed on NLG parts (listed in Table 1 of the AD) are CIS compliant when



installed on an aeroplane approved for operation in CIS wherever is the aeroplane currently operated. There is a need to demonstrate that the repair embodied in the NLG currently fitted on the aeroplane is compliant for CIS operation. After 01 July 2018 all repairs published by AIRBUS or SAFRAN are considering CIS operation limitations.

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

Commenter 2: American Airlines – Ben Niaki – 05/12/2023

Comment # 2

American Airlines (AAL) reiterates the comments given against EASA PAD 23-087 by offering two examples of where confusion was encountered when researching prior RDAS or RC approvals.

Example 1: NLG Barrel P/N D61506, S/N 125B – Airbus RDAS Minor Repair approval found dtd. August 16, 2017. When researching Back to Birth (BTB) Records for this part, the MTS shows prior installations on aircraft MSN's 081, 098 and 803. How does AAL know who operated these MSN's during the dates given on the MTS and consequently if the current NLG barrel installation deems that aircraft a Group 1 a/c?

Example 2: NLG Barrel P/N D61506, S/N B84-671 – Messier-Dowty (Now SLS) Repair Concession (RC) approval found dtd. July 25, 2006. As before, when looking at BTB Records, it shows prior installations on aircraft MSN's 626, 624 and 310 and we don't know who operated these aircraft during the dates given on the MTS. There is also a discrepancy on the repair classification category; page 2 of the RC shows a Minor Repair whereas the BTB form shows it to be a Major Repair. Which one is AAL supposed to use when completing the SLS Repair Assessment form? It should also be noted that this concession approval was granted during a previous overhaul and not the latest one but since it is prior to July 1, 2018 we assume that it is still needs to be reviewed.

These two examples were from three parts reviewed and we believe that we will encounter more inconsistencies going forward. We also believe that other operators will run into similar problems when reviewing RDAS and RC paperwork which can lead to non-compliances or excessive removal of non-affected parts. It is for these reasons, AAL believes that SLS SIL 580-32-3203 should be revised to include a specific list of affected part numbers and serial numbers that we and other operators can use to comply with this upcoming AD.

EASA response:

The operational history of the part as explained in the comment is not a determining factor. As explained in answer to Comment #1, the purpose of the AD is to ensure that any repairs performed on an NLG are CIS compliant when installed on an aeroplane approved for operation in CIS independently from the current area of the aeroplane operation. If the aeroplane is not approved CIS operation (Group3 aeroplanes), no action is required, except if the aeroplane becomes a CIS aeroplane (paragraph (5) of the AD).



Based on the numerous numbers of repairs published on A320 family NLG, it is not possible to establish a complete and accurate list of repaired parts versus the number of aeroplanes eligible for CIS operation. Affected parts are only those repaired prior 01 July 2018 AND installed on a CIS aeroplane.

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

