

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-097

[Published on 27 June 2025 and officially closed for comments on 25 July 2025]

**Commenter 1: European Air Transport Leipzig GmbH – Christian Köth – 01/07/2025**

### Comment #1

DHL still operates 35 A300-600 in Europe utilizing the two-piece cage in the MLG having Part Number (P/N) C66208 or P/N C66208EB. DHL understands that the inspection required by the AD is intended to be accomplished at the next overhaul of the MLG. Nevertheless, DHL has identified a burden that we would like to address to EASA.

In the last years, the supply chain for the landing gear components of the A300 has become very difficult. Also delayed repair concessions and parts shortages have resulted in extended turn-around times. Landing gears could not be provided in time from the MRO, also MRO Safran. DHL was required in the past to extend the landing gear OVH iaw. approved procedures beyond the 8-year maintenance program interval. The proposed AD would restrict the OVH period of the landing gears to 12 000 FC or 8 years without regular extension opportunity and overrule the operator maintenance program. An extension of the AD requirement on other hand would require additional administrative effort for operator, TC holder and also for the authority which is not necessary in fact because relating the AD to the OHV not mentioning the thresholds would be sufficient enough to secure the entire content of the AD.

The landing gear overhaul is already required as per Airbus MRB and it is thereby also a requirement of the approved operator maintenance program. Therefore, DHL does not see the necessity to restrict the overhaul accomplishment time to 12 000 FC or 8 years in this new AD.

DHL proposes to change the wording:

Replacement:

(1) For Group 1 aeroplanes: Before any affected MLG accumulates more than 12 000 FC or 8 years, whichever occurs first after the last accomplished overhaul of the MLG at the time of the effective date of the AD, replace that affected MLG with a serviceable MLG, as defined in this AD.

by:

(2) For Group 1 aeroplanes: At the next MLG replacement at the time of the effective date of the AD, replace an affected MLG with a serviceable MLG, as defined in this AD.

**EASA response:**



**Comment noted:**

*EASA acknowledges DHL concerns regarding the operational impact of the proposed compliance time and the suggestion to omit the 12 000 flight cycles (FC) or 8-year threshold from the AD. However, after careful review, we must respectfully maintain the inclusion of this compliance time in the final AD. The compliance time of 12 000 FC or 8 years was determined based on a risk assessment conducted by Airbus under its Design Organisation Approval (DOA). This assessment reflects the technical evaluation of potential failure modes and ensures that the inspection is performed within a timeframe that maintains an acceptable level of safety. As you correctly noted, only an AD can mandate compliance time. While the Airbus MRB and operator maintenance programs may include similar overhaul intervals, they are not enforceable unless referenced in an AD. Including the compliance time directly in the AD ensures regulatory clarity and uniform application across all operators. The compliance time aligns with the overhaul intervals already defined in Airbus maintenance documentation. Therefore, its inclusion in the AD does not introduce a new requirement but reinforces an existing one. EASA recognizes that operational constraints may occasionally necessitate deviations. The AD framework allows for the submission of Alternative Methods of Compliance (AMOC) requests, which can be evaluated on a case-by-case basis to accommodate specific circumstances without compromising safety.*

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

**Commenter 2: Safran Landing Systems – Olivier Bouchery – 01/07/2025**
**Comment #2**

May I suggest the following, for clarification purposes ?

AS IS:

“Replacement: (1) For Group 1 aeroplanes: Before any affected MLG accumulates more than 12 000 FC or 8 years, whichever occurs first after the last accomplished overhaul of the MLG at the time of the effective date of the AD, replace that affected MLG with a serviceable MLG, as defined in this AD.”

TO BE:

“Replacement: (1) For Group 1 aeroplanes, having fitted one or two affected MLGs overhauled before the effective date of this AD: from the effective date of this AD, before any affected MLG accumulates more than 12 000 FC or 8 years, whichever occurs first, after the last accomplished MLG overhaul, replace that affected MLG with a serviceable MLG, as defined in this AD.”

**EASA response:**

***Comment noted. The proposed revision to the sentence does not enhance the clarity or precision of the original sentence. The current version already clearly defines the conditions under which replacement of the affected MLG is required. EASA considers:***

***1. Redundant Specification of MLG Quantity***

***The phrase “having fitted one or two affected MLGs” is unnecessary. The definition of Group 1 aeroplanes already encompasses aircraft with at least one affected MLG installed, without limiting the number. Therefore, specifying “one or two” adds no meaningful distinction or value.***

***2. Unnecessary Temporal Clarification***

***The addition of “from the effective date of this AD” is redundant. All actions mandated by the AD are inherently required from its effective date, making this phrase superfluous in the context of the sentence.***

***3. No Substantive Change to Core Requirements***

***Aside from the above additions, the remainder of the proposed sentence mirrors the original wording. As such, the proposal does not introduce any substantive change or improvement to the AD’s requirements.***

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

