

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-009

Published on 22 January 2026 and officially closed for comments on 19 February 2026

Commenter 1: Turkish Airlines – Berkay Çakır – 26/01/2026

Comment # 1

In definition section, MLG Bogie Pivot Pin Bushes is included in the affected part list. This component is not repairable and is not tracked with the serial number. Could you please consider removing Bushes from the relevant section?

EASA response:

Comment not agreed. The investigation results confirmed that the bushes may also be subject to damage, and consequently the ISB requires the inspection of MLG bogie pin and bushes. In case of bush damage, the ISB and VSB 10-355-32-40 instruct Safran to be contacted for repairability and further instructions. Consequently, the operator shall refer to the VSB, and ensure that the bushes are repaired or replaced in accordance with Airbus approved instructions.

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

Commenter 2: Qatar Airways – Yacoob Jugoo – 27/01/2026

Comment # 2

Ref.1: EASA PAD 26-009

Ref.2: Safran Landing Systems VSB Ref. 10-355-32-40

Ref.3: Airbus SB A350-32-P059 Rev.01

Ref.1: EASA PAD 26-009, we would like to share the following comments:



A. Definition of “Affected Parts”

Affected parts: Main landing gear (MLG) bogie pivot pin and bushes on right-hand (RH) and left-hand (LH) MLG.

- a. Ref.1 does not list the PN of the affected parts in the definition of “Affected Parts” while this is available in the Ref.2 & Ref.3.

Proposal: QTR propose that the PN of affected parts are included in the definition of affected parts.

B. Definition of Serviceable Parts

Serviceable parts: Affected parts, which are new, or which have passed (no defect found) an inspection in accordance with the VSB, or **which have been repaired in accordance with the VSB**, as defined in this AD.

- a. Ref.1 defines repaired serviceable parts as “... *which have been repaired in accordance with the VSB...*”. QTR note that no repair is available in Ref.2 for the BPP, Bogie Beam and slider bushes that are inspected as per Ref.2.

Proposal: QTR believe that this may be misleading and propose that “**VSB**” in the statement is replaced by “**applicable approved repair instructions**” as approved repair, if possible, shall be provided by Safran Landing Systems (e.g. through RDAS) after damage evaluation

C. RACT 1 Note 1 – Repaired Parts

Inspection(s):

- (1) Before an affected part exceeds 70 100 flight hours (FH) or 13 700 flight cycles (FC), whichever occurs first since first installation on an aeroplane or since last overhaul, as applicable, and, thereafter, at intervals not exceeding 70 100 FH or 13 700 FC (see Note 1 of this AD), whichever occurs first, accomplish DET of that affected part in accordance with the instructions of the VSB.

Note 1: The 70 100 FH or 13 700 FC interval for repetitive inspections, as required by paragraph (1) of this AD, is applicable for unrepaired affected parts. For **parts that have been repaired in accordance with the instructions of the VSB**, the interval specified in paragraph (1) of this AD must be replaced by the interval(s) for post-repair repetitive inspections as specified for each affected part in the applicable approved repair instructions, as applicable.

- a. RACT 1 Note 1 in Ref.1 mentions “*For parts that have been repaired in accordance with the instructions of the VSB...*”. Similar to item (2) above, QTR note that no repair is available in Ref.2 for the BPP, Bogie Beam and slider bushes that are inspected as per Ref.2.

Proposal: Same as item (2) above.

D. RACT 2 – Corrective action(s)



Corrective Action(s):

(2) If, during any DET as required by paragraph (1) of this AD, any discrepancy is detected, as defined in the VSB, before next flight, replace the affected parts on that MLG with serviceable parts, in accordance with the instructions of the ISB.

- a. The inspection and corrective action may also be accomplished in shop
- b. This RACT mentions that in case of findings, replacement of affected parts is required iaw the instructions of the ISB (Ref.3) which is solely for on-wing units.
- c. This RACT instructs that replacement of parts is required before next flight in case of findings. However, Ref.2 is not only for the inspection of the BPP (Steps 3.C.3 & 3.C.4) but also covers the inspection of Bogie Beam & Slider bushes (Steps 3.C.5), and as highlighted in item a above, can be accomplished in shop. Ref.2 instructs the replacement of BPP in case of findings related to the BPP (step 3.C.3) and to contact Safran Landing Systems in case of findings during inspection of Bogie Beam & Slider bushes.

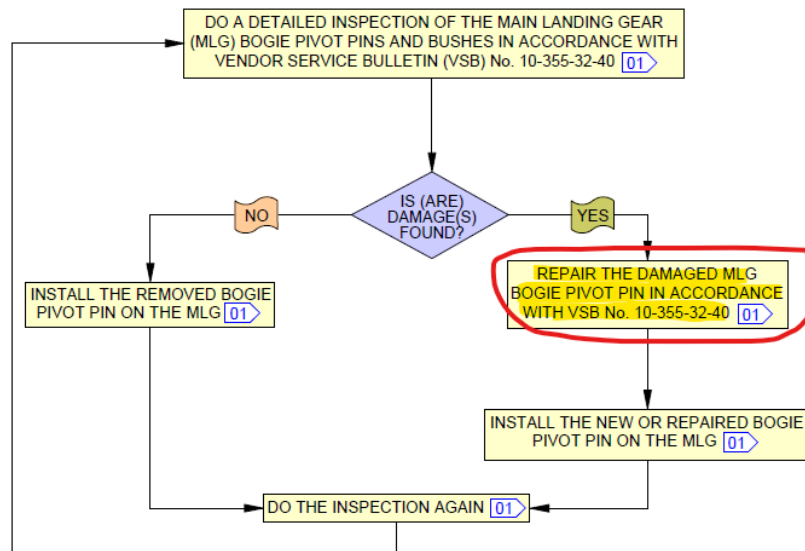
Proposal/Concern:

- i. While information on different types of damage to BPP is available in Ref.2 (step 3.C.4), this information is not available for Bogie Beam & Slider bushes (Ref. 2 step 3.C.5). QTR believes that Safran Landing System shall also provide information on the type of damage that Bogie Beam & Slider bushes are susceptible to.
- ii. QTR note that Ref.2 guides for the replacement of the BPP iaw CMM in case of findings. Consequently, QTR propose that the VSB Ref.2 and CMM are also reflected in RACT 2 to cater for corrective actions in shop
- iii. QTR propose that the statement in Ref.1 is updated to also allow obtaining / following approved repairs from Safran Landing Systems in case of findings for compliance (in addition to existing requirement of part replacement in RACT 2). This will be consistent with Ref.2 and also helpful for compliance in shop.
- iv. In reference to the word “replace” in this RACT, QTR will appreciate clarification and guidance on the following case: Inspection is performed in shop during MLG Assembly shop visit and reveal findings on BPP. The same BPP is repaired and re-installed on the same MLG Assembly.

E. Comments related to accomplishment instructions in Airbus SB Ref.3

- (a) Do a detailed inspection of the LH MLG bogie pivot pin, MLG bogie/slider bushings and MLG bogie/slider lug bores in accordance with Ref. SAFRAN LANDING SYSTEMS (K0654) VSB 10-355-32-40 within the threshold given in PLANNING INFORMATION paragraph 1.E.(2).
- 1 If damage(s) is(are) found:
- Repair the damaged LH MLG bogie pivot pin in accordance with Ref. SAFRAN LANDING SYSTEMS (K0654) VSB 10-355-32-40.
 - Install the new or repaired LH MLG bogie pivot pin in accordance with Ref. Task A350-A-32-XX-P059-03ZZZ-720Z-A.
 - Do the inspection again in accordance with Ref. Task set A350-A-32-XX-P059-01ZZZ-93BZ-A at the interval given in the PLANNING INFORMATION paragraph 1.E.(2).

CONF ALL



- a. The accomplishment instructions in Ref.3 mentions to repair the BPP in accordance with Ref.2 in case of findings. QTR note that no repair is available in Ref.2 for the BPP, Bogie Beam and slider bushes that are inspected as per Ref.2



Concern: QTR is concerned that the aforementioned instructions in Ref.3 may be misleading. QTR believe that the accomplishment instructions of Ref.3 must be corrected and made available to operators well before the issuance of the EASA AD.

- b. The accomplishment instructions in Ref.3 mentions to do DET of MLG bogie/slider lug bores iaw Ref.2

Concern: Ref.2 only covers the inspection of BPP, Bogie Beam & Slider bushes but not the MLG bogie/slider lug bore (which requires removal of the fitted bushings) and therefore there is a mismatch between Ref.3 & Ref.2.

F. Other comments

- a. For ease of identifying and tracking repaired units, QTR believes that physical identification on the repaired unit will also be useful (e.g. permanent marking of the repair reference on the repaired component).

G. RACT 1 – Initial compliance / Threshold

Inspection(s):

(1) Before an affected part exceeds 70 100 flight hours (FH) or 13 700 flight cycles (FC), whichever occurs first since first installation on an aeroplane or since last overhaul, as applicable, and, thereafter, at intervals not exceeding 70 100 FH or 13 700 FC (see Note 1 of this AD), whichever occurs first, accomplish DET of that affected part in accordance with the instructions of the VSB.

- a. For the Threshold / initial compliance, RACT 1 mentions “Before an affected part exceeds 70 100 flight hours (FH) or 13 700 flight cycles (FC), whichever occurs first since first installation on an aeroplane or since last overhaul...”. RACT 1 is not clear on the base line (since first installation on an aeroplane or since last overhaul), whether it is whichever occurs first or last. Ref.2 & Ref.3 mentions which ever occurs last.

Proposal: QTR propose that the above is clarified in the EASA AD

EASA response:

A. Comment not agreed. EASA decided to define the affected part without specifying P/N, as the relevant bushes do not have a P/N.

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

B. Comment agreed. The Final AD has been amended accordingly.

C. See answer to comment # B.



D. Comment not agreed. The ISB refers to the instructions of the VSB. Consequently, the operator shall refer to the VSB while complying with the required actions. The parts repaired in accordance with Airbus approved instructions are considered serviceable parts, as per the AD Definitions.

The AD raises requirement at aircraft level, so if an MLG assembly has an affected part installed and such part is found damaged, this MLG assembly can be reinstalled on an aeroplane only if the affected part meet the AD serviceable part definition.

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

E. Comment not agreed.

In case of bush damage, the ISB and VSB 10-355-32-40 instruct Safran to be contacted for repairability and further instructions. Consequently, the operator shall refer to the VSB, and ensure that the bushes are repaired or replaced in accordance with Airbus approved instructions. Airbus has been conacted and committed to correct the editorial typo in the ISB. It is to be noned however that paragraph (1) of EASA AD requires to accomplish the inpection in accordance with the VSB, which provides correct instructions by referring to bogie beam bush bores and sliding piston bush bores.

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

F. Comment noted. No need has been identified to require physical (re)identification of inspected/repared parts.

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

G. Comment agreed. The AD has been amended accordingly.

