

EASA PAD No. 06-071
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	Paragraph 1 seems to be applicable to all a/c without mod. 31152 even if not listed in the PAD Applicability. This misunderstanding is due to the fact that Compliance paragraph 2 is referred to a/c listed in the PAD applicability paragraph.	Luigi Visinalis Wind Jet S.p.A.	01/04/2004	Indeed title of Compliance paragraph 1 and 2 are not homogeneous. However it is to be made clear that actions in Compliance box are applicable to aircraft defined in Applicability box. The Type/Model designation box does not detail applicability but just the general type of aircraft concerned.
Compliance	Two comments about para 3 : application of SB A320-32-1310 : a) first neither SB nor AD take into account the possibility to reinstall a old standard of BSCU (BSCU 9.1 P/N : C202163382D32). Please note that this is possible for A/C pre mod 26965 Landing Gear - Wheels and brakes - introduce BSCU common standard. This is also linked to AIB SB A320-32-1912 (in service evaluation of EMM BSCU). So please could you clarify the actions and intervals to be applied on an A/C that was fitted with EMM (L4.1 and/or L4.5) BSCU and then re-normalized whit a standard BSCU (9.1). b) secondly this AD do not take in consideration the fact that gear can be replaced. As an example, further to one event of lug rupture, AFR had to remove the gear for full restoration (done under AIB and Messier Dowty control). In the mean time the A/C was retrofitted with EMM L4.8 BSCU. So, in the even of : 1) NLG replacement with a gear that was never installed on an A/C fitted with BSCU EMM L4.1 or L4.5 or, 2) NLG shop restoration with replacement of upper support and cylinder, associated with prior installation of a EMM BSCU L4.8, AFR considers that this correspond to the same configuration than an A/C that have been delivered new with BSCU L4.8 (the weaken parts as upper support and cylinder have been replaced). To cover this case please could you confirm if further to gear exchange or repair	N. GIGANDET Landing Gear Systems engineer Air France A320 fleet	10/04/2006	a) Following your comment, AD applicability is extended. Associated actions and intervals are defined in the AD. b) No further action is required by this AD on aircraft fitted with: - a NLG with new upper support anti-rotation lugs and new cylinders lugs OR - a NLG for which it can be demonstrated that it was never driven by a EMM BSCU L4.1 or L4.5 AND - a EMM BSCU standard L4.8 or a non EMM BSCU

	<p>associated with a BSCU retrofit in L4.8, A/C (previously fitted with EMM BSCU L4.1 or L4.5) are still concerned by this AD or not. If yes please could you provide more details to AFR on the reasons.</p> <p>These comments were already provided to AIB following SB A320-32-1310 issue.</p>			
Compliance	SB A320-32-1310 allows compliance with para. 3.1. & para 3.2. and NOT as mentioned with para. 2.1. & 2.2. because content of ref. SB is addressed to the same subject as para. 3. (also compliance schedule is the same).	<p>Erwin Fleberger</p> <p>Austrian Airlines</p>	21/04/2006	The wording has been improved in the AD to make clear that instructions for NLG pressure check (§ 2.1) and instructions for boroscopic inspection (§ 2.2) are also given in SB.