

EASA PAD No. 07- 040
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 16 April 2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Supersedure	Document "EASA AD 2006-0069R1.AMOC.0002" should be stated as well as "EASA AD 2006-0069R1" as this document has been used by the operator since 2nd August 2006 using the revised relaxed inspection frequencies of 150FC DVI and 940FC Ultrasonic.	Alan Woods, British Airways Engineering	15/03/2007	An AMOC only provides an acceptable alternative method to address part or all of the problem described in an AD. An AMOC does not supersede an AD, hence it is not referenced here.
Reason	<p>End of the first paragraph, "the structural integrity of the MLG" will not be affected. The "structural integrity of the MLG Installation" may be affected.</p> <p>Page 1 Paragraph 2. It is stated that "EASA AD 2006-0069 was issued to address this condition and required repetitive inspections and, if cracks were found, the replacement of the fitting.</p> <p>This is not necessarily true and should be clarified. As always has been the case, if a crack is found on a visual inspection then yes the MLG Rib 5 fitting would need to be changed prior to further flight, however as AD paragraph 2 Compliance states "in case of findings as per NTM requirements, the repair of the fitting will have to be performed". The Rib could still need replacing but that would depend on the severity of the findings whilst embodying repair as per SB A320-57-1118 and/or SRM 57-26-13. This statement on the PAD should be amended.</p> <p>Page 1 Para 2. Ref to "AD 2006-0069R1". Reference should also be made to "EASA AD 2006-0069R1.AMOC.0002" as this document is the current compliance. Also include the word "and" after the AD ref. and prior to the word "mandates" to ensure correct grammar.</p>	Alan Woods, British Airways Engineering	15/03/2007	<p>The AD identifies the worst case unsafe condition. It is accepted that it is the MLG installation that is affected. PAD amended.</p> <p>PAD clarified as suggested.</p> <p>The AMOC is a stand alone document with a clear applicability. It is not necessary to be mentioned within the AD. Grammar corrected.</p>
	Inspections: Item 1.1. Final Statement. The following AMM extract task number "Sub task 05-51-11-210-105" should be included. This quickly gives the operator the information to ensure that compliance is maintained.	Alan Woods, British Airways Engineering	15/03/2007	The required action following a hard landing is the inspection in accordance with Service Bulletin A320-57-1138. No amendment is

	<p>"Subtask 05-51-11-210-105 A. General inspection recommendations NOTE: Refer to the latest revision of the EASA AD 2006-0069 (or any related local Airworthiness Authorities directive) for other possible inspection requirements for the wing bottom skin area at MLG support Rib 5, before the subsequent flight."</p> <p>Inspections: Item 1.2. Final Statement. Again, the following AMM extract task number "Sub task 05-51-11-210-105" should be included. This gives the operator the information to ensure that compliance is maintained.</p> <p>2. Final Fix. Final Paragraph. The PAD states "A MLG support Rib 5, is in compliance with the requirements of this directive." A statement should be made, as is in the paragraph above, that the completion of the SRM repair constitutes terminating action and cancels the inspection requirements.</p>			<p>considered necessary.</p> <p>Statement clarified.</p>
Compliance	<p>With reference to Compliance / 2. / Final Fix, MON feel that the embodiment of SB A320-57-1118 Rev.02 within 5 years from the effective date will increase the maintenance burden for some operators as the 10 year landing gear overhaul interval may fall beyond the compliance time, thus necessitating a standalone task to embody the SB. This could affect aircraft between approximately MSN 1750 to 1823 which were built between Spring and Autumn 2002.</p> <p>If you concur with this statement then the final fix could read as "within five (5) years or next landing gear overhaul whichever is the later after the effective date...."</p>	Ash Phillips, Monarch Aircraft Engineering Ltd.	29/03/2007	<p>The compliance time is based on in service experience, including the rate of crack development and risk exposure across the fleet. In order that the aircraft remain in compliance with the certification requirements we can not concur with the proposal made. AIRBUS may be able to support individual operator requests for extended compliance times on a case by case basis – this would, of course, require approval by the NAA of the operator.</p>
Required Actions, Compliance Time	<p>ATA received comments from a member, US Airways, which are detailed as follows:</p> <p>"US Airways would like to point out that there is a lack of a requirement for an NDT inspection, in particular dye penetrant, if the MLG Rib Lug Bore is found without any corrosion. The current SB A320-57-1118 does not mandate it, though the SRM 57-26-13 repair requires the inspection after honing of the bore to remove corrosion. SB A320-57-1118 relies on a visual inspection for crack, which US Airways feels is inadequate. This dye penetrant inspection</p>	<p>Gabriel Okolski, Air Transport Association of America, Inc.</p> <p>Mark R. Rudo, Managing Director Technical Services,</p>	<p>13/04/2007</p> <p>03/04/2007 [e-mail to ATA]</p>	<p>Current in service experience is that cracking is only suspected after corrosion is evident. The approach therefore only requires crack detection if corrosion was found. Operators may, of course, adjust the inspection techniques in accordance with national procedures.</p>

	<p>requirement should be added to the SB regardless of findings.</p> <p>US Airways would also like to point out that the terminating action time limit of 5 years from issuance of the AD may cause operational and planning complications. This is due to the fact that USA's newest aircraft without Mod 32025J2211 has an Entry Into Service (EIS) of June 9th, 2002. The approximate schedule for MLG change is 10 years from EIS date, which will approximately be in 2012. The required terminating action, if the AD is released this year, would require implementation within 5 years or in 2012. US Airways would like to request the terminating action to be extended to 6 years. This would provide some flexibility on scheduling and ensure [that] the terminating can be accomplished during the gear change, NOT required to be accomplished just beforehand due to a time limit not in-sync with the gear change. We would accept the fact that continued Visual or NDT inspections be carried out until the modification is completed."</p>	US Airways		Refer to response to similar comment from Monarch Aircraft Engineering Ltd.
Ref. Publications	The SB revision that will be released mandatory is 57-1118 Rev.3. Airbus is ready to issue this Revision. Airbus thinks that this should be updated in the PAD, which currently states rev 2.	Christine Escala, Airbus	16/04/2007	Agreed, R3 mentioned.
Applicability	Delete reference to SRM 57-26-13 Paragraph 5.B. The reason is that the repairs 5B (A319/A320/A321) depicts the replacement of the bushes by new ones of the same standard (pre-mod by pre-mod or post-mod by post-mod). The upgrade (pre to post mod 32025) is done through the SB 57-1118 only. Furthermore, the repairs 5C (A319) and 5D (A320/321) lead to the installation of repair bushes with high interference fit.	Christine Escala, Airbus	16/04/2007	Agreed.
Compliance (final paragraph)	Delete reference to SRM 57-26-13 Paragraph 5.B. Reason as above.	Christine Escala, Airbus	16/04/2007	Agreed.