

**EASA PAD No. 07- 209**  
**COMMENT RESPONSE DOCUMENT**  
**[officially closed for comments on 19 December 2007]**

| PAD / DOC<br>PARAGRAPH<br>COMMENTED | COMMENT / PROPOSAL   | AUTHOR OF<br>THE<br>COMMENT  | DATE OF<br>COMMENT | PCM RESPONSE  |
|-------------------------------------|--|--|--------------------|---|
| Reason                              | <p>Messier-Bugatti suggest to add in the reason of the AD:</p> <p>"Robustness improvements of the BSCU/tyre compatibility to restore margin in the frame of the correction of the loss of braking efficiency at low speed"</p>   | <p>Sophie<br/>GEISTEL</p> <p>Systems<br/>Business Team<br/>Design Office</p> <p>MESSIER-<br/>BUGATTI</p>           | 17/12/2007         | <p>The "reason" Paragraph of the AD is intended to describe the failure/unsafe condition that is addressed by actions specified the Airworthiness Directive. It is recognised that the PAD noted that BSCU Std 10 includes other improvements but as these are fully described SB A320-32-1336 it is not proposed to address these in the AD.</p>   |
| Compliance /<br>Reason              | <ul style="list-style-type: none"> <li>• BSCU standard 10 and standard L4.9 should be fully interchangeable for purposes of compliance with the AD.</li> <li>• Accomplishment of Airbus SB 32-1335 should be an optional terminating action.</li> <li>• The proposed rule should identify the "other improvements" of BSCU standard 10 and their relevance to the issue.</li> <li>• The proposed rule should clarify the root cause of the event mentioned as the impetus for its issuance.</li> </ul> | <p>Craig Fabian</p> <p>Director of<br/>Technical<br/>Operations</p> <p>Air Transport<br/>Association<br/>(ATA)</p> | 19/12/2007         | <p>These two standards of BSCU are not interchangeable for the purpose of addressing the unsafe condition as described in this AD.</p> <p>As SB A320-32-1335 addresses the installation of BSCU Std L4.9 which as stated above is not an acceptable method to address this unsafe condition, is not therefore an acceptable terminating action.</p> <p>It must now also be noted that Airbus has determined that it is necessary to withdraw the BSCU Std L4.9 (refer to OIT/ FOT REF: SE 999.0142/07/LB dated 21 DEC 2007 and AOT A320-32A1343</p> |

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|  |  |  |  | <p>dated 10 JAN 2008).</p> <p>Please see above comment/response in respect of "other improvements".</p> <p>the intent of the AD is to describe the failure, the resultant unsafe condition and the means established to correct this</p> <p>As such the description of the failure (displacement of the nose wheels from center resulting in runway excursion) is considered appropriate to describe the cause, effect and hence the need for corrective action.</p> <p>However, the "Reason" is amended to clarify the possible consequence of the failure condition.</p> |
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