COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 08-120
CLOSED FOR COMMENTS ON: 21 November 2008

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required action(s) and Compliance Time(s)	Within the 'Required action(s) and Compliance Time(s)' wording: the second paragraph states "For aircraft with less than or equal to 2 500 Flight Cycles (FC) and 22 months from the first flight... Should this not read "For aircraft with less than or equal to 2 500 Flight Cycles (FC) or 22 months from the first flight.."?	Ken Delaney Aer Lingus Engineering	22/10/2008	The initial wording has been kept because if both conditions are not met: with less than or equal to 2500 FC **and** 22 months, the next paragraph is applicable. It avoids the sentence “which ever occurs first”.
General	Associated with release of the AD-note Airbus should be advised to update the „Crew and maintenance observations“ section of the Trouble Shooting Manual (Airn@v TSM) as well, taking into regard similar findings during routine maintenance inspections; e.g. crew or technical walk-around. The required trouble shooting task should reflect state-of-the-art corrective action and fly-on limits (!), when a bogie beam stop pad is found damaged, dislocated, cracked or without the required teflon pad.	Christian Brinkmann	22/10/20008	Airbus will take into account this remark to check if it’s possible to implement it.
Required action(s) and Compliance Time(s)	I think the wording of Compliance Time, item 1 should be changed from "For aircraft with less than or equal to 2500 Flight Cycles (FC) **and** 22 months" to "For aircraft with less than or equal to 2500 Flight Cycles (FC) **or** 22 months".	Elvio Damian Marinelli System Engineer Aircraft Systems Lufthansa Technik AG	23/10/2008	Same comment as above

Required action(s) and Compliance Time(s)	In this PAD, the case of this inspection will be performed accordingly to the during landing gear overhaul is not referred. Consequently in case this inspection is performed during overhaul could you confirm that no additional inspection will be required on the bogie once it will be reinstalled an aircraft. In addition in order to perform this inspection during C check, could you extend the grace period to 24 months (in this PAD it is 18 months), to allow that all C checks are covered (currently for AFR and their costumer the C check interval is 21 months and it will be increased to 24 months).	Didier Bédu Engineering 330/340 Group Manager Air France	29/10/2008	As written in Airbus SB which details instructions for one-time inspection of all bogie beams for deformation or impact damage, if an acceptable bogie beam inspection report has been sent to AIRBUS in the last year, this inspection is not necessary on the applicable bogie beam. The safety justification for the threshold and grace periods is currently being re-investigated in the light of the latest finding of bogie beam cracks under the stop pad. Until this is complete, EASA and Airbus is not in a position to extend the times given in the PAD. All findings of damage or no findings to inspections must be reported to Airbus customer service. This is will be used to further justify the inspection thresholds and may also **lead to up-dates** to the grace period given.

	South African Airways and Messier-Dowty are finalizing the details for replacing the main landing bogies (MLG) on the A340-600 fleet. All our aircraft is fitted with 50-1217001-00 MLG bogies that have to be replaced on 29000 FH or 4800 FC, whichever occurs first. Refer to Airbus SB A340-32-5092. The aircraft with the highest hours is 26315 FH and it is planned to replace the bogies starting the January 01, 2009. Depending on the starting date of the AD, it is possible that all the affected aircraft will have their MLG bogies replaced before the expiry of the 18 month period stated in the PAD. Please consider this matter.	André Serfontein. Engineering Analyst South African Airways	14/11/2008	If these bogie beams are being replaced with new parts before the 18 months period of the AD, the new bogie beams will have to be inspected at the next convenient maintenance opportunity that occurs after the 2500 FC or 22 months threshold, whichever occurs first, but not later than 40 months. The removed BB's returned to Messier-Dowty will be inspected by Messier-Dowty for this issue for information gathering.
Required action(s) and Compliance Time(s)	1. Accomplishment timescale (para 1). The proposed accomplishment timescale in incompatible with the C Check interval in use by several operators, CPA and HDA included. Currently we have an interval of 21MO however several operators have a C Check interval of 24MO. The consequence of the proposed threshold, is that the work will have to be performed outside of a hangar maintenance opportunity. We are concerned that the work involved which involves paint and cadmium stripping/reapplication is best performed in the controlled setting of hangar maintenance. Furthermore the proposed 18MO grace period will result in significant additional groundings of aircraft and maintenance burden. On review of our fleet, we have determined that 23 out of 62 affected aircraft will require inspection outside of a scheduled C Check. We are aware of the long duration between the in-service findings prior to issue of the inspection SB, and we are of the opinion that the application of the inspection with a grace period of 24MO would actually increase airworthiness as the rework/reprotection would be done in a more suitable work environment. We are well aware of the maturity issues surrounding surface corrosion underneath the stop pad, however, it is also our	Martin Downey Technical Services Engineer - Airbus Fleet Cathay Pacific Airways Ltd.	19/11/2008	The safety justification for the threshold and grace periods is currently being re-investigated in the light of the latest finding of bogie beam cracks under the stop pad. Until this is complete, EASA and Airbus are not in a position to extend the times given in the PAD. All findings of damage or no findings to inspections must be reported to Airbus customer service. This is will be used to further justify the inspection thresholds and may also **lead to up-dates** to the grace period given.

	experience that we have overhauled 31 sets of MLG without any cracking detected, and our understanding is that over 250 sets of A330/A340 MLG have been overhauled without crack findings in this area. Therefore we propose the following wording: "For aircraft with less than or equal to 2 500 Flight Cycles (FC) and 24 months from the first flight of the aircraft or from the first installation of the bogie beam in-service on an aircraft or from the date of the last bogie beam overhaul, at the effective date of this AD: - at the next convenient maintenance opportunity that occurs after the 2 500 FC or 24 months threshold, whichever occurs first, but no later than 48 months from the first flight of the aircraft or from the first installation of the bogie beam in-service on an aircraft or from the date of the last bogie beam overhaul. For aircraft with more than 2 500 FC or 24 months from the first flight of the aircraft or from the first installation of the bogie beam in-service on an aircraft or from the date of the last bogie beam overhaul, whichever occurs first, at the effective date of this AD: - at the next convenient maintenance opportunity or within 24 months from the effective date of this AD, whichever occurs first." 2. Application of the Inspection during overhaul. For aircraft having overhaul due within the grace period, or in the case that the Messier-Dowty SB has been previously accomplished, please provide reference within the AD to the fact that the requirement is satisfied by the application of SB A33/34-32-279 or A33/34-32-280 or A33/34-32-281 (as applicable) during repair or overhaul.			There is no need to revise the AD because the Airbus SB 32-3220/4264 are published to cover Messier-Dowty VSB No. A33/34-32-279 for 'Basic' MLG, A33/34-32-280 for 'Growth' MLG and A33/34-32-281 for 'Enhanced' MLG.

	3. Reporting Period (para 2) We consider that 30 days is an appropriate period for reporting the inspection results to Airbus. Therefore we propose the following wording: "The results of this inspection, whatever they are, must be reported to AIRBUS within 30 days from the accomplishment date of the inspection."			30 Days is acceptable.
	There is an ambiguity in the Messier-Dowty SB A33/34-32-280 (covered by Airbus SB A330-32-3220 and SB A340-32-4264). We have noted that SB A33/34-32-280 (Airbus SB A340-32-4264) has an issue on Figure 3, as only the 'common bogie' configuration is illustrated (post SB A33/34-32-107). Due to the differing bogie stop pad standards pre and post SB A33/34-32-107 (introducing the 'common bogie' to supersede the 'growth bogie') there is a risk that this ambiguous documentation could result in the incorrect bogie stop pad being installed. Due to the different profile of the growth and common bogie beam, the installation of the incorrect pad could damage the bogie beam. Therefore I have requested that this SB A33/34-32-280 shall be revised to avoid any discrepancy or maintenance error. I have proposed to Airbus that there shall be separate illustrations for bogies in pre and post SB A33/34-32-107 configuration. I would request that this SB shall be revised prior to the issue of the AD to avoid the potential for maintenance error.	Martin Downey Technical Services Engineer - Airbus Fleet Cathay Pacific Airways Ltd.	20/11/2008	The ability to fit a stop pad other than the one removed during the inspection is controlled via the text in the VSB, not via the drawing in figure 3 of this VSB, as it is for the associated VSB's for each standard of stop pad. This figure simply gives a pictorial view of the stop pad with the latest standard of bogie beam.

	Referring to Messier SBs A33/34-32-279 / 280 / 281 the inspections required are: (a) A one time only visual inspection of the sliding piston subassembly, where the bogie stop pad touches. (b) A one time only visual inspection for cracking and/or distortion of the bogie stop pad. (c) A one time only visual inspection for cracking of the surface of the bogie beam under the bogie stop pad subassembly. (d) A one time only visual inspection for corrosion of the surface of the bogie beam under the bogie stop pad subassembly. (e) A one time only Magnetic Particle Inspection of the surface of the bogie beam under the bogie stop pad subassembly. While PAD 08-120 requires only a detailed visual inspection of both MLG bogie beams under the bogie stop pad for detection of deformation or damage So is it mandatory to carry out all the five inspections mentioned above or just what the PAD 08-120 requests?	Fares Gharaibeh Supervisor Service Engineering Royal Jordanian	23/11/2008	All the inspections detailed in the VSB's must be performed. The AD wording has been revised to make the required actions less specific to prevent any misunderstanding : Required action(s)and Compliance Time(s): Required as indicated, unless already accomplished: 1. Perform **inspections** of both **MLG's in the region of the bogie stop pad** for detection of deformation or damage and apply the associated corrective actions in accordance with instructions defined in AIRBUS Service Bulletin (SB) A330-32-3220 or SB A340-32-4264 or SB A340-32-5087, as applicable;