



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-128
CLOSED FOR COMMENTS ON: 20 November 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>BRITAIR comments concerning EASA PAD N° 09-128:</p> <p>Following the initial occurrence of Main Fitting cracks observed in the filler and bleeder port area in 2002, and some isolated landing gear events, the Messier Dowty F100 Landing Gear system has been subsequently placed under repetitive Eddy Current inspection programs introduced in 2005 and onward with defined limitations which have allowed a safe monitoring and operation of the F100 fleet since.</p> <p>Per se, these landing gears Sliding Member and Main Fitting have been respectively monitored since the issue of SBF100-32-144 dated September 19, 2005 and SBF100-32-146 dated February 02, 2006 with a 2000 Flight Cycle repetitive interval.</p> <p>As stated in PAD 09-128, such repetitive inspection requirements would now become superseded by SBF100-32-155 which would mandate the replacement of such gear Main Fitting by a new one at the next gear overhaul or before December 31, 2013, whichever occurs first.</p> <p>This position, opening to significant costs exposition, not to mention part availability issues, is not acceptable to the airline industry still crossing uncertain times, as the mandatory replacement does not stand necessary against the current monitoring program that has proven satisfactory.</p> <p>The current F100 Messier Dowty landing gear monitoring program, yet stringent, has been constitutive of an accepted and controlled way of operating this equipment in a safe manner.</p> <p>Again, and as stated by Fokker Services AOF100.093 <i>"With small cracks, depending on size and location, the gears still have sufficient strength capability for all certified loads"</i>.</p>	Alain Laboue Britair, France	04/11/2009	<p>The main consideration for mandating the redesigned MLG (Main Landing Gear) is that it is not found acceptable that the safety of a Safe Life Item is based on repetitive inspections. The repetitive inspections in combination with defined limitations reduced the risk to the extent that operation of the aircraft was considered acceptable while a final solution was under development. The introduction of the redesigned MLG will remove the risk that the repetitive inspections only reduce.</p> <p>The logistical aspects of the introduction of the redesigned MLG were taken into account when the compliance criteria proposed in PAD 09-128 were defined.</p> <p>Following the comments received, these compliance criteria were again reviewed. EASA concludes that the proposed compliance criteria should be maintained. In particular, rephrasing the compliance to "next MLG overhaul or within 48 months, whichever comes later" would lead to an ill</p>

	<p>There is a strong feeling among F100 operators that commercial reasons are behind this forced introduction of a new Main Fitting and Sliding Member.</p> <p>Fokker has been responsible for the design and Messier Dowty for the production of the Main Landing Gear. In case of design deficiency, the generally accepted way for a TCH and its selected OEM to tackle the issue is to introduce a replacement component free of charge for the operators. This is not the case, by far, for the subject matter. In contrary, Fokker Services initiated a commercial sales program.</p> <p>The continuation with the existing Main Fitting and Sliding Member, in combination with the repetitive inspection programs in place, up till and including 2013 or the next Main Landing Gear overhaul, which-ever-comes-later will, to our experience, be a controlled way of operation as already being proven over the last 4 years.</p> <p>For this reason, and with the scope of PAD09-128, we would like to continue the operation of our Fokker F100 fleet with the current Main Landing Gear using this existing inspection programs and associated limitations as an alternative means of compliance.</p> <p>We urge you to review and soften the compliance requirements mentioned at SBF100-32-155 so as to implement an AD program shall not compromise safety but that shall also be taking into account the interest of the F100 Operators and of the airline industry in general.</p>			<p>defined compliance time as the number of flight cycles remaining before the next MLG overhaul on the affected fleet is such that for many aircraft this could mean far more than 48 months of operation.</p> <p>The risk of continued operation, for a period longer than 48 months, based on repetitive inspections, is considered to be unacceptable.</p> <p>The Final AD has not been changed as a result of this comment.</p>
Required Action(s) and Compliance Time(s)	<p>In reference PAD 09-128 EASA it is stated that the production of a strengthened main fitting and sliding member terminates the option for continuation of the repetitive inspection in according to Fokker services SBF100-32-137 Rev.2 February 9, 2004 or later Rev. and Messier Dowty SB F100-32-104 Rev.2 October 30, 2003 or later Rev.</p> <p>However over the past years the repetitive inspection in combination with defined limitations has been proven to be an accepted and controlled way of operating the existing Fokker 100 with the Messier Dowty Main Landing Gear. As stated by Fokker Services AOF100.093: <i>"With small cracks, depending on size and location, the gears still have sufficient strength capability for all certified loads"</i>.</p> <p>The Fokker 100 aircraft have reached an age whereby in foreseeable future various aircraft will be taken out of operation. The development and production of a new fitting and sliding member has taken more than 6 years and in between operators</p>	Theo Hermans KLM Cityhopper	18/11/2009	Please see the response to the comment above.

	<p>had no choice but to execute and invest in a large number of MLG overhaul. For many operators this modification comes too late and will hardly create any benefit.</p> <p>We understand the introduction of these new designed gears as an ultimate solution and also resolve any future parts obsolesce. Though the enforcement of this AD, on or before December 2013 whatever comes first, is strongly felt as a commercial program and not as an enhanced safety case. Fokker Services was responsible for the design and Messier Dowty for the production of the Main Landing Gear. The regular way that Type Certificate Holders and Original Equipment Manufacturer resolve failing designs is offering free of charge replacement parts or a form of compensation for loss of residual life time. Neither one is offered. The total financial burden is imposed to the airlines.</p> <p>The continuation with the existing Main Fitting and Sliding Member, in combination with the repetitive inspection, up till and including 2013 or MLG overhaul which ever comes later will, to our experience, be a controlled way of operation. This has already been proved over the last 7 years.</p> <p>For this reason we like to continue the operation with the MLG using this existing alternative means of compliance but in line with <u>"whatever comes later"</u> replacement limitation in stead of whatever comes first.</p> <p>We kindly but urgently request you to review the compliance requirement as proposed in SBF100-32-155 and we highly appreciate that in a final decision the position and interest of the operators is taking more into account.</p>			