


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-032 [Published on the 9th April 2010 and closed for consultation on the 30th April 2010]

Commenter 1 : ACT AIRLINES INC., Ülker ERDÖNMEZ / Burak DAYANÇ, 13th April / 7th May 2010

Comment # 1

“**Part A. (1)** and also **Table 1** of EASA PAD 10-032, do not include a compliance time for the first inspection of MLG Retraction Actuator Sliding Rods accumulated less than **12000 FC**. Could you please clarify this issue?”

Two of our A/Cs match the below scenario that we have explained earlier.

For each concerned A/Cs, one Retractor Actuator Sliding Rod fitted on the aircrafts (TC-ACY (MSN 107) and TC-ACZ (MSN 105)) had been replaced with a new one at an earlier shop visit which still have not accumulated more than 12000 FC.

The subject example rod fitted on TC-ACY (MSN 107) had been replaced at Lufthansa Technic on 04/12/97 with a factory new rod.

The rod had accumulated 3649 FC since then and under 12000 FC threshold which the PAD 10-032 did not take under consideration.

EASA response:

In the scope of this particular Airworthiness subject, not only the AD requirements have been put in place.

The inspection/maintenance program of the MLG has been also updated, including actions to be performed, at the next MLG overhaul opportunity.

According to this MPD update, at 12000 FC, every MLG Retraction Actuator Sliding Rods will be inspected.

Consequently, the need on which the AD requirements are focussing is the MLG Retraction Actuator Sliding Rods which are beyond the first MLG overhaul.

Referring to the example mentioned, EASA confirms that no specific action is required i.a.w. AD requirements.

Note:

When writing the EASA response, the responder should express first whether EASA agrees, partially agrees, or disagrees with the submitted comment /change proposal and should explain the grounds of the response.

[e.g. “we disagree. Vibration trend monitoring is successful in detecting cracked HPT seals, /... / and is the most practical way to prevent an unsafe condition due to cracked HPT seals. The AD remains unchanged.” or “we agree. We have added the aeroplane model to the applicability”]