


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 10-125</b> <b>[Published on 17<sup>th</sup> December 2010 and officially closed for comments on 14<sup>th</sup> January 2011]</b>

**Commenter 1: Air France – Didier BEDU –21/12/2010**
**Comment # 1**

Please find here after Air France comments concerning PAD 10-125 :

- Cases of overhauled gears that have been recently installed on A/C are not described. Please indicate that inspection has to be performed 26 months after a/c first flight of overhauled gears installation at the latest but not before 12 months (identical as a new aircraft).

Further, we would like to report the following :

Airbus SB does not minimize works to be accomplished to perform this inspection.

In particular, no special recommendation is given to avoid operators to perform unnecessary tasks after bogie pivot pin reinstallation as : brake bleeding, bogie stop pad adjustment check, electrical operational tests, landing gear operational test and free fall test. These tests and checks are not required because only bogie pivot pin will be removed, the bogie and dressing remain in position, connected to the aircraft and will be not electrically or hydraulically disconnected.

Airbus will be contacted to take into account these last comments in order to reduce unnecessary aircraft grounding time and workload.

**EASA response:**

*In other required landing gear inspections the thresholds have been modified to take into account the Overhauled parts (ex: EASA AD 2011-0032 “NLG Main Fitting - Modification”), but PAD 10-125 does not cover the same issue. A probability approach at A/C level was performed to define the threshold; this is the reason why the threshold is related to the A/C and not to the MLG. Even if an operator has changed the landing gear several times, the inspection has to be done within 26 months after the effective date of the AD.*

*The second comment from the operator is not related to the AD, therefore is directly answered by Airbus.*

**Commenter 2: Thomas Cook Aircraft Engineering – Daryl Thomas – 23/12/2010**

**Comment # 2**

Thomas Cook UK & Scandinavia have overhauled the MLGs on the majority of their A330 fleets over the last two years, with one as recently as late September this year.

During the overhauls seven of the subject pins were replaced due to corrosion at the Shurlock spline area (this information has been relayed to both Airbus and Messier-Dowty).

The proposed AD inspection (SB A330-32-3240) is accomplished IAW Messier-Dowty SB A33/34-32-285. This VSB requires the visual examination the chromium plated surfaces of the bogie pivot pin, and if there are findings a Magnetic Particle Inspection (MPI) should then be accomplished and all findings reported to Messier-Dowty.

But the inspections accomplished during overhaul (CMM 32-12-02) are more detailed and also include NDT inspections (MPI).

Therefore unless this requirement is for data retrieval, as a consequence of overhaul information not been volunteered by operators during overhaul, Thomas Cook cannot understand why a second inspection would be necessary in such a short timescale.

**EASA response:**

***AD requirements are not for data collection but to correct an unsafe condition.***

***The reaction time is based on safety assessment at aircraft level.***

**Commenter 3: Swiss International Airlines Ltd. – Lukas Zuellig – 05/01/2011****Comment # 3**

Please find below an input from Swiss International Airlines addressing the release of PAD 10-125.

Recommendation: At the moment there are several different documents released which talk about different intervals to lubricate the MLG and CLG Bogie Pivot Pins.

This is why SWR recommends to include also a request into the AD to have the inspection interval reported in addition to the inspection results. SWR is convinced that this gives a more meaningful picture to all.

**EASA response:**

*This suggestion is already included in the AD via the reporting requested as per Airbus SBs (referenced in the AD) which in turn call up for MD VSBs and associated proforma for reporting (such proforma request to report the lubrication interval as well).*

**Commenter 4: Deutsche Lufthansa AG – Brigitte Gilles – 12/01/2011****Comment # 4**

Regarding the PAD 10-125 (Landing Gear – Main and Central landing Gear Bogie Pivot Pins and Bushes – Inspection / Repair / Replacement), which was published December, the 17th 2010, Lufthansa have some comments to the upcoming AD.

In the last two years DLH did already some maintenance actions on the A330/A340 fleets at the pins and bushes. For example we did repairs on pins and bushes and changes of pins and bushes on wing and also during overhaul of the landing gears.

Due to the fact, that the upcoming AD will demand a detailed visual inspection of the MLG and CLG bogie pivot pins and pivot pin bushes within 26 months after effected date of this AD or since the aeroplane first flight, whichever occurs later, but not before the accumulation of 12 months after the aeroplane first flight, DLH propose to give a credit for already inspected and / or changed bushes and pins and also for landing gears getting already an overhaul.

Please check, if there is a possibility getting a credit for inspection / part change in the past and getting a longer compliance period in case of repairs.

**EASA response:**

*In other required landing gear inspections the thresholds have been modified to take into account the Overhauled parts (ex: EASA AD 2011-0032 “NLG Main Fitting - Modification”), but PAD 10-125 does not cover the same issue. A probability approach at A/C level was performed to define the threshold; this is the reason why the threshold is related to the A/C and not to the MLG. Even if an operator has changed the landing gear several times, the inspection has to be done within 26 months after the effective date of the AD.*