


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-061 [Published on 10 June 2011 and officially closed for comments on 08 July 2011]

Commenter 1: SAS (Scandinavian Airlines System) Airbus LR Engineering – Carsten Trige Pedersen – 15/06/2011

Comment # 1

Just received EASA PAD no: 11-061. I have a question to this PAD/AD. SAS has just started Overhaul of the MLG's(10 years old) and during this OVH Messier Dowty SB A33/34-32-284 is carried out – does that mean that SAS has complied with para (4)? And further could this SB A33/34-32-284 not be mentioned in the AD, because I assume that many Airlines have this SB carried out at OVH and at the MRO's only work to the Messier Dowty SB and not the Airbus SB?.

In the PAD you mention Messier Dowty SB A33/34-32-271 but shouldn't it be SB A33/34-32-272?

EASA response:

EASA agrees. An additional paragraph has been added in the Final AD to clarify that Accomplishment of the instructions of Messier-Dowty SB N° A33/34-32-278 and Messier-Dowty SB N° A33/34-32-283, or Messier-Dowty SB N° A33/34-32-284, as applicable to the MLG type, is an acceptable method to comply with the requirements of paragraph (1) of this AD.

The reference to Messier Dowty SB A33/34-32-271 in paragraph (2) is correct. However, Messier Dowty SB A33/34-32-272 is as well, when applicable, an acceptable method to comply with the requirements of paragraph (1) of this AD. Paragraph (2) of the Final AD has been updated accordingly.

Commenter 2: EIALA - AIRBUS Central Entity – Jorge Monzon – 17/06/2011

Comment # 2

We have reviewed the PAD after some operator questions. As you know this new AD (PAD 11-061) supersedes AD 2008-0093, and therefore the inspection is to cover the same applicability: "except those on which AIRBUS modification 54500 has been embodied in production or AIRBUS Service Bulletin (SB) A330-32-3212 has been embodied in service". This MOD/SB introduces the Enhanced MLG, [which] is why we propose to modify the PAD to include this clarification for the inspection.

EASA response:

EASA agrees. Paragraph (1) of the Final AD has been updated to clarify that this paragraph is not applicable to aeroplanes on which AIRBUS modification 54500 in production or AIRBUS Service Bulletin (SB) A330-32-3212 in service.

Commenter 3: Delta Airlines – Brian J Erickson – 17/06/2011**Comment # 3**

Delta offers the following comment on PAD 11-061 "Main Landing Gear (MLG) Bogie Beam – Inspection / Repair / Modification":

PAD Paragraph (6) of "Required action(s) and Compliance Time(s)" section is currently written as:

"After the effective date of this AD, do not install any MLG Bogie Beam on an aeroplane, unless it has been successfully inspected and modified in compliance with the requirements of this AD."

Delta will appreciate EASA and Airbus consideration to change ... "do not install any MLG Bogie Beam" ... to ... "do not install any replacement MLG Bogie Beam"

The proposed change is significant because it would allow operators with affected bogies to remove and re-install them for access only purposes such as MLG shock absorber seal replacement and also bogie pin removal for inspection (recent EASA AD 2011-0040) and would not require the PAD accomplishment during that immediate maintenance visit.

EASA response:

EASA disagrees. A MLG Bogie Beam which has not been inspected nor modified in accordance with the instructions Airbus SB A330-32-3237 or Airbus SB A340-32-4279, as applicable, can be installed on aeroplane if the compliance time specified in paragraph (4) have not been exceeded. Nevertheless, paragraph (6) of the Final AD has been updated for clarification.

Commenter 4: Thomas Cook Aircraft Engineering – Daryl Thomas – 21/06/2011**Comment # 4**

The publications issued prior to this PAD recommend that this inspection/modification is accomplished at next overhaul or shop visit, but the PAD appears to have reduced this to 6 years post last inspection. Can I suggest that the previous recommendation is utilised.

EASA response:

EASA disagrees. Airbus SB A330-32-3237 and A340-32-4279 have to be accomplished within the compliance time specified in paragraph (4).

No changes have been made to the Final AD in response to this comment.

Commenter 5: SR Technics Switzerland – Andreas Jenny – 24/06/2011**Comment # 5**

The Proposed Airworthiness Directive (PAD 11-061) gives information about an upcoming inspection/modification of the Main Landing Gear Bogie Beam. In accordance to Para (4) a modification of the bogie beam is mandated before the MLG Bogie Beams have accumulated 15 years since their first flight on an aeroplane, or within 6 years after the accomplishment of the inspection as required by paragraph (1) of this AD, whichever occurs later.

Several aircraft were inspected with SB A330-32- 3225 and A340-32-4268 during last overhaul. Under these circumstances the modification has to be performed within 6 years since inspection. SB A330-32-3237 and A340-42-4279 refer to Messier-Dowty VSB A33/34-32-283 and -284 which has to be performed during Shop Visit. Due to this fact a replacement of the Bogie & Dressing is necessary. This has a great impact for your customers.

Question to EASA / Airbus:

Would it be possible to perform a second inspection i.a.w. SB A330-32- 3225 and A340-32-4268 to avoid replacement of Bogie & Dressing prior next overhaul? The final/terminating action could be postponed to the next scheduled Landing Gear overhaul. If yes, the AD should include a procedure for a second inspection (i.a.w. SB A330-32- 3225 and A340-32-4268).

EASA response:

EASA disagrees. Airbus SB A330-32-3237 and A340-32-4279 have to be accomplished within the compliance time specified in paragraph (4).

No changes have been made to the Final AD in response to this comment.

Commenter 6: Swiss International Air Lines Ltd. – Lukas Zuellig – 29/06/2011**Comment # 6**

SWR Engineering likes to provide the following comment on PAD 11-061:

Assuming that SB A330-32-3225 / SB A340-32-4268 (Ref. PAD 11-061, paragraph 1) has been performed on a large number of landing gear bogie beams so far, the focus is on paragraph 4.

The proposed time requirement (15 years since first flight on an airplane or within 6 years after accomplishment of SB A330-32-3225 / SB A340-32-4268, whatever occurs later) will cause unacceptable burden to airlines operating older aircraft with landing gears that have already been overhauled in the last few years. Pending the date of accomplishment of SB A330-32-3225 / SB A340-32-4268, the proposed AD due date will be significantly before the next landing gear overhaul.

Since the new requirements per SB A330-32-3237 / SB A340-32-4279 (VSB A33/34-32-289) can only be performed in a shop, the time requirement of the new AD must be chosen so that all bogie beams (pre and post SB A330-32-3225 / SB A340-32-4268) can be performed during the occasion of a planned landing gear overhaul in the shop.

Otherwise this AD will have an unacceptable impact to the operation (ground time planning) and will in addition cause logistical burden for the landing gear shops to

have sufficient spare bogie beams available on time.

SWR asks EASA to get into the time requirement details again to allow the future operation of the A330 and A340 fleet without any additional significant impact to the airlines.

EASA response:

EASA disagrees. Airbus SB A330-32-3237 and A340-32-4279 have to be accomplished within the compliance time specified in paragraph (4).

No changes have been made to the Final AD in response to this comment.

Commenter 7: AIR FRANCE / KLM – Farid Aouraghi – 04/07/2011

Comment # 7

Please find below comment of AFR regarding the PAD 11-061 :

1. Paragraph (4) : my understanding is that :

- the visual inspection of MLG bogie beam internal bores iaw SB A330-32-3237 and A340-32-4279 will be performed through VSB A33/34-32-278 , and
- the modification of the MLG bogie beam iaw SB A330-32-3237 and A340-32-4279 will be performed through VSB A33/34-32-284 or 283 .

These SB must be done before the MLG BBs have accumulated 15 Years since their first flight on a AC, or within 6 years after the accomplishment of the inspection as required by paragraph (1), whichever occurs later.

However, this VSB A33/34-32-278 (inspection of the bogie beam internal diameter for corrosion at overhaul) and VSB A33/34-32-284 or 283 (introduction of a new bogie and dressings with a new two coat paint procedure) must be performed in shop as required by these VSB.

In that case a Bogie beam with the AD deadline is reached before the overhaul, have to be removed in service for VSB application in shop (A/C downtime about 1 month); this situation will deeply impact the operation schedule.

Actual example :

- A bogie beam with first flight on A/C on 30 OCT 2000.
- Overhauled on 18 MAY 2010 (with inspection of BB performed iaw VSB A33/34-32-271), and installed on MSN 377 on 04 JUN 2010.
- The calculated AD deadline is 18 MAY 2016 while the overhaul deadline is 04 JUN 2020.

Could you review this compliance time and associated required actions to be in line with overhaul?

2. The paragraph (4) is the final fix of this bogie beam defect, could you mention that the application of the SB A330-32-3237 and A340-32-4279 cancel requirements of paragraph 1, 2, 3 and 5 of this AD.

3. The SB A330-32-3237 and A340-32-4279 require to check if the SN of bogie beam is listed in appendix A of VSB A33/34-32-284 and 283. If the SN of BB is in the appendix A these SB required only to re-identify the PNs of BB (so requirements referenced in the paragraph (4.1) and (4.2) have not to be applied).

- Would you add this SN check requirement in this AD and its compliance time?
- Could you mention that the SNs of bogie beams listed in appendix A of the VSB A33/34-32-284 and 283 are not concerned by the paragraph 1, 2, 4.1, 4.2, 5 of this AD?

4. Mistake in the paragraph 4.1) and (4.2): SB A340-32-4279 instead of A340-42-4279.

EASA response:

1. EASA disagrees. Airbus SB A330-32-3237 and A340-42-4279 have to be accomplished within the compliance time specified in paragraph (4).
 2. EASA agrees. Modification of an aeroplane in accordance with the instructions of Airbus SB A330-32-3237 or Airbus SB A340-42-4279, as applicable to the aeroplane type, cancels the requirements of paragraph (1) of this AD. The Final AD has been updated accordingly.
 3. EASA disagrees. The Bogie Beams having SN as listed in Appendix A of Messier Dowty SB A33/34-32-283 or 284 have to be re-identified in accordance with the instructions of Airbus SB A330-32-3237 and A340-32-4279. These specific SNs are therefore to be modified as per SB/VSB, the modification being the re-identification to the correct PN.
 4. EASA agrees. The correct reference is A340-32-4279. The Final AD has been amended accordingly.
- No changes have been made to the Final AD in response to comments 1 and 3.

Commenter 8: Lufthansa – Rolf Schweitzer – 04/07/2011

Comment # 8

Regarding the PAD 11-061 (A330 and A340-200/300 - Landing Gear – Main Landing Gear (MLG) Bogie Beam – Inspection/Repair/Modification)), published June 11th 2011, Lufthansa would like to comment the upcoming AD as follows:

1. In para. 2 of the ref. PAD (and also within the List of Ref. Publications), Messier-Dowty SB No. A33/34-32-271 is referenced. Within Airbus SBs A330-32-3225 / A340-32-4268, only Messier Dowty SB No. A33/34-32-272 is referenced for the inspection details.

EASA is kindly asked to clarify if in para. 2 of the ref. PAD the ref. Messier-Dowty SB No should be A33/343-32-272 instead.

2. EASA is kindly asked to add a statement in para. 4 of the ref. PAD that declares accomplishment of A330-32-3237 / A340-32-4279 prior to AD-effective date as sufficient for AD-compliance.

3. In para. 4.1 of the ref. PAD, a visual inspection of the MLG Bogie Beams is required in accordance with the instructions of Airbus SBs A330-32-3237 / A340-32-4279. These two SBs unfortunately do not contain any inspection instructions - they only describe the corrective actions after the inspection. EASA is kindly asked to clarify the references in this paragraph of the ref. PAD. We assume that the Inspection-SBs A330-32-3225 / A340-32-4268 are meant instead.

4. In para 4.2 of the ref. PAD Airbus SB A340-42-4279 is referenced. EASA is kindly asked to clarify if there is a typing error and ATA 32 (SB A340-32-4279) is meant instead as ATA 42 is not defined.

EASA response:

1. The reference to Messier Dowty SB A33/34-32-271 in paragraph (2) is correct. However, Messier Dowty SB A33/34-32-272 is as well, when applicable, an acceptable method to comply with the requirements of paragraph (1) of this AD. The paragraph (2) of this AD has been updated accordingly.
2. EASA disagrees. MLG bogie beams which have been inspected and modified in accordance with the instructions of Airbus SB A330-32-3237 or A340-32-4279 before the effective date of this AD are compliant with the paragraph (4) of this AD. This is covered by the statement “Required as indicated, unless accomplished previously”.

3. Instructions of the visual inspection of internal bores of the MLG Bogie Beams are detailed in the subtasks “MODIFY THE BOGIE BEAM AND AXLE SUB-ASSEMBLY, BOGIE BEAM SUB-ASSEMBLY AND BOGIE BEAM M/C” of Airbus SB A330-32-3237 or A340-32-4279, as applicable, as these subtasks indicate to do the inspection as per VSB A33/34-32-278.

4. EASA agrees. The correct reference is A340-32-4279. The Final AD has been amended accordingly.

No changes have been made to the Final AD in response to comments 2 and 3.

Commenter 9: SIA Engineering Company Ltd – Samantha Wang – 05/07/2011

Comment # 9

I refer to PAD 11-061 Landing Gear – Main Landing Gear (MLG) Bogie Beam – Inspection / Repair / Modification.

This AD retains the requirements of EASA AD 2008-0093, which is superseded requiring an additional modification of the left-hand (LH) and RH MLG bogie beam.

EASA AD 2008-0093 was not applicable to a/c [that] has embodied 54500 in production. However no mention was made in PAD 11-061 with regards to such a/c.

Would a/c on which airbus mod 54500 embodied in production be affected by paragraph (1) of PAD 11-061 which is similar to the requirements of AD 2008-0093?

EASA response:

EASA agrees. Paragraph (1) of the Final AD has been updated to clarify that this paragraph is not applicable to aeroplanes on which AIRBUS modification 54500 in production or AIRBUS Service Bulletin (SB) A330-32-3212 in service.