


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-074 [Published on 21 July 2011 and officially closed for comments on 18 August 2011]

Commenter 1: easyJet – Michael Foster – 25/07/2011
Comment # 1

PAD 11-074 references “EMM BSCU Std 10 (P/N C202163392E34) or of EMM BSCU std 10.1 (P/N C202163392E35)”. These two part numbers are conventional standard BSCU's, not EMM (ref Airbus SIL 32-126). The reference to EMM only applies to BSCI Std L4.1, L4.5, L4.8 and L4.9B.

EASA response:

Comment accepted. The Final AD has been amended accordingly.

Commenter 2: SAS – Lars N. Kragh – 27/07/2011
Comment # 2

The previous AD (2006-0174) was only related to A/C's with version L4.1 or L4.5 and this document includes version L4.8, but it is not clear what there has to be done to fulfill the requirements of this document.

We have 3 A319 which were delivered with L4.8 and 1 was delivered with L4.9 but all are upgraded to L4.9B according to SB A320-32-1350.

There are 2 paragraphs with (5), and my comment is only related to the first. The first paragraph (5) calls out these 4 A/C but SB A320-32-1310 Revision 01 specify: For Config. 01 aircraft (Twin Wheel MLG), if a BSCU standard L4.9B has subsequently been installed (by SB A320-32-1350 or SB A320-32-1361) or a BSCU Std 10 has subsequently been installed (by SB A320-32-1360 or SB A320-32-1336), the boroscope inspection detailed in this Service Bulletin will not be necessary

1) The requirements of this document allow the A/C to operate with L4.8 [installed], up to 6 months after the last inspection and does not call [for] any inspections after the installation of L4.9B (ref paragraph 3.2). So what is the purpose and [what is] required for paragraph 5 if the A/C have been upgraded to L4.9B after delivery and before effective date of this document?

2) If the total FH/FC for an A/C with L4.8 installed is lower than 6000 FH / 4500 FC is 1 inspection still required?

3) Is the installation time for version L4.9 considered to be within or outside the scope of this document?

EASA response:

- 1) Aeroplanes on which the BSCU L4.9B has been installed before the effective date of this AD are compliant with the requirements of this AD.**
- 2) Aeroplanes on which the BSCU L4.8 is installed have to comply with the requirements of paragraphs (1), (2) and (3) of this AD.**
- 3) It has been clarified by Airbus that there is no aeroplane in service with the standard BSCU L4.9 installed. This standard has been abandoned and is no longer available.**

No changes have been made to the Final AD in response to these comments.

Commenter 3: Air France – Nicolas Gigandet – 28/07/2011
Comment # 3

After review of proposed PAD 11-074, please find AFR comments :

- 1) title: " Nose Landing Gear Braking and Steering Control Unit – Inspection / Replacement" for better understanding EASA should dissociate both elements by inserting "and" between NLG and BSCU "" Nose Landing Gear AND Braking and Steering Control Unit – Inspection / Replacement""
- 2) Applicability: installation of BSCU L4.9B or std 10 is defined by AIB with a interchangeability code 01 (refer to SB). This means that aeroplane fitted since EIS cannot receive previous BSCU standard. So EASA AD effectivity may be limited to aeroplane PRE MOD 38973. The fact to open applicability to "ALL" will induce management difficulties as new aeroplane will always be affected by AD requirements.

Moreover this is in contradiction with :

- AD proposal para 3 that specify L4.9B installation as a terminating action (i.e. after AD is no more applicable)
- SB 32-1310 R01 effectivity that is limited to MSN 3696 (i.e. for MSN above para 1 and 2 of AD is not covered by any procedure)

- 3) terminating action : in reason para it is specified that terminating action is optional :

"For the reason described above, this ADintroduces the installation of BSCU L4.9B... ..as an optional terminating action for the repetitive inspection"

This is in contradiction with para 3 that mandates BSCU modification within 6 months, please review if final fix is mandatory or optional

- 4) general comments on BSCU denomination : BSCU std 10 and 10.1 are NOT "EMM" BSCU while in AD it is written several times "EMM BSCU std 10"

- 5) Required action para: in page 2 it is specified : "Paragraphs (1), (2) and (3) of this AD are applicable only to aeroplanes equipped with one of the following BSCU standards that have not received Airbus modification 31152 in production (i.e. applicable only to aeroplanes with the steering powered by the green hydraulic system):"

This means that aeroplanes driven by yellow hyd steering are not concerned by para (2) borescope inspection and (3) terminating action requirements. So as written, [the] AD does not mandate any action for aeroplanes with yellow steering.

Please confirm (note: this is not in line with previous AD and AIB SB 32-1310).

- 6) Regarding NLG leg, AIB and MBD had defined some specific actions to be applied during shop process as overhaul or unscheduled removal (NDT inspection of the lugs, upper support modification). AD proposal do not require such type of action. In order to facilitate understanding please could you clearly specify in AD that apart of BSCU replacement on A/C, no other action on the leg is mandated to terminate AD application.

7) table 2 "aeroplane configuration" 3rd line may be dedicated to bogie aeroplane while A/C mention "Twin wheels".

8) para 1.2 : 100F/C inspection in case of shock absorber fault :

After reviewing SB 32-1310 R01 accomplishment paragraph and associated synoptic, AFR noticed :

- such requirement was fully deleted from SB 32-1310 R01, this SB only covers the standard initial and repetitive inspection
- SB procedure states that if initial inspection has already been applied on the A/C, the pressure check is not to be done. This is in contradiction with para 1.2.1 and there is a heavy risk not to follow this mandatory requirement if SB procedure is followed.

Please could you review this point with AIB in order to have the same requirements in SB and AD

EASA response:

1) Suggestion accepted. The title Final AD has been amended with a "/".

2) Comment not accepted. The paragraph (5) considers the case of aeroplanes on which Airbus Modification 38973 has been embodied in production. We would like to remind that an AD remains applicable during the full in service life of the aeroplane, except if the AD is superseded or cancelled. In this particular case, since a BSCU can be moved from one aeroplane to another, with regards to the AD rules, the AD Applicability has to consider all aeroplanes for which the part has been certified for installation.

3) Comment accepted. The paragraph "Reason" has been amended accordingly.

4) Comment accepted. The Final AD has been amended accordingly.

5) Comment accepted. Airbus has clarified that the "Operational Procedure" of paragraph (1) is limited to aeroplanes with green steering. The Final AD has been amended accordingly.

6) Suggestion accepted. The paragraph "Reason" of the Final AD clarifies that no action is required on the NLG leg.

7) Comment accepted. The Final AD has been amended accordingly.

8) The operational check of the CFDS message of paragraph (1.2) of the AD was not part of the Airbus Service Bulletin 32-1310 at original issue. This procedure is included in the OIT 999.0090/05.