


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-135 [Published on 22 December 2011 and officially closed for comments on 19 January 2012]

Commenter 1: Deutsche Lufthansa AG – Brigitte Gilles – 16/01/2012

Comment # 1

Regarding the PAD 11-135 (Landing Gear – Main Landing Gear Bogie Beam – Inspection / Repair / Modification) which was published December, the 22th 2011, Lufthansa have a comment to the upcoming AD.

In the last years DLH did already some maintenance actions on the A330/A340 fleets at the Bogie Beams. Because of the requirements of AD 2007-0314R1 and AD 2011-0141 Lufthansa did the required inspections on Bogie Beams sometimes shortly after the overhaul.

For example: The overhaul was in Dec. 2008 and the inspection was done in April 2009. Due to the compliance time for the Repeat inspection, which is written in the PAD §1, Table 2, the repeat inspection must be done not later than 6 years since its first flight after MLG bogie beam overhaul which occurs after the last inspection. In this case it means next overhaul after last inspection is in 2018. So the next inspection must be done before 2024. Is this understanding right or should it means: No later than 6 years after MLG bogie beam overhaul OR after last inspection

EASA response:

Comment understood. However, in the case as presented by the commenter, the modification SB (A330-32-3237 or A340-32-4279), which as per paragraph (8) of the AD constitutes terminating action for the inspections required by paragraph (1), would be required to be accomplished before the MLG bogie beams accumulate 21 years since first installation on an airplane which, in case of the commenter's example, would translate to a compliance date in 2019.

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