


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 12-103</b> <b>[Published on 6 August 2012 and officially closed for comments on 3 September 2012]</b>

**Commenter 1: Air France – Baptiste Hericher – 08/08/2012**

**Comment # 1**

Regarding the PAD 12-103 (AIRBUS: Time Limits and Maintenance Checks – Safe Life Airworthiness Limitation Items – ALS Part 1 –) which was published August, 06th 2012, AFR have a comment to the upcoming AD.

As noted on PAD 12-0103, this AD supersedes only EASA AD 2010-0253 dated 03 December 2010.

As ALS Part 1 rev 06 incorporated the requirements of EASA 2011-0212 (Landing Gear – Main Landing Gear (MLG) Bogie Beam – Life Limit ) dated October, 31th 2011 and the requirements of the EASA AD 2011-0122-E (Landing Gear – Main Landing Gear (MLG) Bogie Beam – Life Limit) dated June, 29th 2011, it will be very appreciable that the upcoming EASA AD supersedes EASA AD 2010-0253, 2011-0212 and 2011-0122-E.

**EASA response:**

***Superseding the subject EASA EAD 2011-0122-E dated 29 June 2011 and EASA AD 2011-0212 dated 31 October 2011 would provide one additional year to comply with the reduced instructions and airworthiness limitations applicable to the concerned bogie beams PNR (while grace period of these ADs are already overdue). Therefore, EASA has decided not to supersede those 2 ADs and it is expected that they should be superseded in the framework of the next AD mandating the subsequent ALS Part 1 revision.***

**Commenter 2: Deutsche Lufthansa – Brigitte Gilles – 30/08/2012**

**Comment # 2**

Regarding the PAD 12-103 (Time Limits and Maintenance Checks – Safe Life Airworthiness Limitation Items – ALS Part 1 – Amendment) which was published August, the 06th 2012, Lufthansa have a comment to the upcoming AD.

With the A330 ALS Part 1, Revision 06 respectively A340 ALS Part 1, Revision 06, Life Limits which are required by EAD 2011-0122-E respectively EAD 2011-0212 are now included in the ALS Parts, so that the AD 2011-0122-E and AD 2011-0212 could be superseded by the upcoming AD. To simplify the documentation, please

add the AD 2011-0122-E and AD 2011-0212 in the Supersedure Section of the upcoming AD.

***EASA response: See above answer.***