


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-108 [Published on 29 July 2013 and officially closed for comments on 26 August 2013]

Commenter 1: BAE Systems (Operations) – Iain Deed – 30/07/2013

Comment # 1

BAE SYSTEMS have the following comments on PAD No.: 13-108 - Landing Gear – Main Landing Gear – Inspection / Replacement:

1. Required Action(s) and Compliance Time(s): para (5): The PAD states that the visual inspection does not start until after the NDT inspection (para 2, Part A of BAE SYSTEMS' SB 32-A-JA851226, Rev 5) has been accomplished. However, the SB (para N(2)) states that the visual inspection has to be performed every 300 landings / 3 months, hence, this could occur before the next NDT inspection is due. BAE SYSTEMS propose that the PAD is reworded to align with the SB compliance requirement.
2. Required Action(s) and Compliance Time(s): para (7): BAE SYSTEMS' SB 32-A-JA851226, Rev 5 (para N(4)) allows early accomplishment of APPH SB 32-40 to be claimed as the initial inspection. It (the SB) also states that any landing gear, which has been in storage, must be inspected prior to installation on the aircraft, however, there is no equivalent statement in the PAD. BAE SYSTEMS propose that the PAD is reworded to align with the SB compliance requirement.

EASA response:

Item 1. While the PAD wording does not exactly replicate that in the SB, it is considered that the intent of the SB has been covered in the PAD such that visual inspections are required at 300 MLG FC or 3 month intervals between the NDT inspections. We do not therefore intend to amend the PAD.

Item 2. First comment. It is accepted that the option of using the accomplishment of APPH SB 32-40 as the initial inspection was omitted from the PAD. The following statement will be added to para (7): "Accomplishment of APPH Service Bulletin 32-40 at Initial issue or Revision 1 satisfies the requirements of the initial inspection."

Second comment. The statement in the SB regarding the inspection of any main landing gear in storage only covers those landing gears with a microswitch hole. In practice it would be expected that any landing gear to be fitted to an aeroplane would be in compliance with the AD and therefore it is considered that including a statement about the inspection of main landing gears with a microswitch hole in storage would not be of any benefit. We do not therefore intend to amend the PAD in this area.

Commenter 2: BAE Systems (Operations) – Pete Titterington – 02/08/2013**Comment # 2**

PAD 13-108 references the 3100 Series aircraft, we believe that this should be removed as the 3100 Series is covered by PAD 13-109 on the same subject. Can you please give this your consideration.

EASA response:

While the two PADs are linked they cover different Service Bulletins which have different applicability's. We do not therefore intend to amend PAD 13-108.