

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-134 [Published on 05 September 2013 and officially closed for comments on 03 October 2013]

Commenter 1: EasyJet – Michael Foster – 08/09/2013

Comment # 1

Ref PAD 13-134 regarding the mandatory requirement to overhaul MLG retraction actuators, within the “Reason:” there is a note which states:

“Note: This requirement was previously introduced in Airbus A318/A319/A320/-A321 ALS part 4 original issue approved on January 8, 2008”.

The ALS Part 4 actually stipulates the ultimate scrap life limit of the retraction actuator parts, not the overhaul requirement of the retraction actuator; it would be more accurate to state that the requirement for MLG Retraction Actuator overhaul is stipulated in the MPD Appendix 7.

Further to this, within the “Required Action(s) and Compliance Time(s):”, it can therefore be stated that “any retraction actuator that has been overhauled IAW MPD Appendix 7 requirements is not affected by the requirements of this AD”.

It would be appreciated if EASA would consider these comments with a view to amending the AD IAW these remarks before issuing the AD.

I look forward to EASA adjudication on these remarks in due course.

EASA response:

Comments accepted. The related requirements are actually in the MRBR, task 32.11.00/14.

The Final AD has been amended accordingly.

Commenter 2: Avianca (Brazil) – Diogo Bertoldi Youssef – date

Comment # 2

In regards to the PAD 13-134 analysis it was observed that:

- (PARAGRAPH 1) The use ALS Part 4 limits to control the compliance time of mandatory requirements can induce into a mistake, once the ALS Part 4-2 indicates different life limitation for Retraction actuator parts in Sub-Par 4-2-1 and 4-2-2, but neither one indicates a control period for the Retraction Actuator P/N mentioned in PAD Paragraph 1, the AD could clear state which Period Control must be used.

I hope this comment help with the future AD development.

EASA response:

Comment agreed. ALS part 4 indicates subparts of the MLG retraction actuator that have a life limitation.

The 'Reason' and the 'Required Actions' sections of the Final AD have been amended accordingly. See also comment #1.