


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No. 14-057</b></p> <p><b>[Published on 25 March 2014 and officially closed for comments on 08 April 2014]</b></p>

**Commenter 1: easyJet Airline Company Limited – Michael Foster – 26/3/2014**

**Comment # 1**

Under Appendix 1 of the PAD the NOTE numbering is either incorrect i.e. starts at NOTE 2, the list should start at NOTE 1 and end at NOTE 5; or the current list is missing NOTE 1.

**EASA response:**

**Comment partially agreed. Note 1 (of the AD) can be found in the RACT section of the (P)AD.**

**The reference to Note 1 in paragraph (2) of the Final AD has been amended in response to this comment.**

**Commenter 2: Air France – Olivier Demede – 3/4/2014**

**Comment # 2**

The life limit of Upper Cardan of 60 000 FC has been already demonstrated in ALS Part 1 AFR understand that this new limitation has been found on a single event. Please find AFR comments on this PAD:

- there is no AMM task for Upper Cardan replacement on A/C.
- A VSB to check Upper Cardan integrity would be easier to apply with on wing inspection.
- AFR has potentially 6 unit under PAD effectivity. What is the MBD support in term of spare?
- Can a on wing NDT inspection may reveal the crack. By FPI or ultrasonic inspection. MBD has a sample to develop such inspection.
- AD effectivity concerns A/C Pre or Post Mod 26644, the Mod Status of A/C coming from other airlines is unknown. Same problem for A/C WV of other airlines A/C.
- AFR raise a traceability concern regarding the weight variant and associated limitation to apply correct life limitation even though the note 4 refer to ALS process.
- AFR thinks that it would be better if AD effectivity concerns MLG P/N 201163620 fitted on the A/C A32x family and not the A/C model only.

**EASA response:**

**Comment not agreed. A sidestay can be removed and replaced in accordance with AMM instructions; a cardan can be replaced in accordance with respective CMM instructions; Airbus has defined life limitations based on certain Weight Variants of specific SA models.**

**These comments should have been addressed to Airbus at the time of communication of these new limitations. Depending on Airbus substantiation, EASA may revise / amend the AD accordingly. In case of non-traceability of a part, the most restrictive limitation applies. Continued operation of Safe Life components beyond demonstrated fatigue life, with or without inspection, cannot be justified.**

**As these comments are not relevant for the current AD, no changes have been made to the Final AD in response to these comments.**

### **Commenter 3: SAFRAN Messier-Bugatti-Dowty – Dave Parsons – 9/4/2014**

#### **Comment # 3**

**[A]** Reason section: “this AD requires implementation of the new life limits, as applicable, and replacement of any affected MLG upper cardan units that have already exceeded the reduced limit”. Comment: If we find the part out of life on receipt of the AD, is there a grace period?

**[B]** “...next revision of the Airbus A318/A319/A320/A321 ALS Part 1”. Comment: When will this be issued?

**[C]** RACT section: §(1) “within 3 months after the effective date”. Comment: Can this grace period be extended? When will the first aircraft drop dead date be due? Can this be stated within 3 months confirm the current FC of the part, advise Airbus? Then before it gets to the limit, replace. If we get the operators feedback on FC, then we can understand the timescale to produce the solution or manage spares.

**[D]** §(1) “replace each MLG upper cardan P/N 201163620 with a serviceable part”. Comment: could we add the post mod part number?

#### **EASA response:**

**Comments understood, but not agreed. Answers are as indicated below.**

**[A]** Yes, paragraph (1) of the (RACT section of the) AD allows 3 months after the effective date. Compliance times (or grace periods) are usually not stated in the Reason.

**[B]** Please contact Airbus for that information.

**[C]** Please note that the replacement requirement is stated as 3 months, or before exceeding the new limit, “**whichever occurs later**”, which means that the 3 months is only valid for those parts that, on the effective date, are close to, or have already exceeded the new limit. All other parts can be used until reaching the new limit. No AOG are expected. Operators should be aware of the FC accumulated by each part, as these are normally ‘tracked’ parts.

**[D]** The term ‘serviceable part’ is chosen deliberately to allow ‘later approved parts’ to be installed in future – not only the current post-mod P/N – without having to apply for an AMOC, or EASA having to revise the AD.

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

### **Commenter 4: Aer Lingus – David Burke – 28/05/2014**

**Comment # 4**

Aer Lingus have a query in relation to the life limits noted in PAD 14-057.

The PAD doesn't seem to address the case whereby a MLG upper cardan could have been installed on a gear which operated previously (with a different operator) at a WV015 / WV017 but is now installed, post overhaul, on the existing operators WV012, WV011, WV016 or WV018 aircraft.

Note 2 does mention the life limit accumulated by the MLG unit since its first installation on an aeroplane, therefore Aer Lingus would believe that previous operators WV would be relevant in terms of defining the correct life limit for a current operators existing MLGs.

Can EASA please confirm whether it is necessary for current operators to establish the back to birth WV of the MLG and if that life included operating at WV015 / WV017, that the current operator is forced to use the lesser life limit, even though they do not operate at WV015 / WV017.

The above criteria is also relevant to an A319, whereby a previously operated A320 MLG at WV015/WV017, which post overall if installed on an A320 would have a life limit of 42,140 but if installed on an A319 would have a life limit of 56,480 as WV is not noted in Appendix 1 for the A319 in determining the life limit. Can EASA please address this case and identify what life limit should be applied to an A319 in this case?

**EASA response:**

***Comment not agreed. Note 4 (see Appendix 1) of the AD provides the necessary guidance.***

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