



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-004 and 09-005
CLOSED FOR COMMENTS ON: 04 February 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General Comment	<p>We would like to suggest that instead of issuing the two new Ads as suggested (09-004 & 09-005), that EASA should issue one AD against SB RB211-72-F227 to be accomplished at next 05 module overhaul, but not later than 31 May 2014. In ACA's opinion, this new AD should not address the on-wing inspections. ACA's suggestion would be to keep AD's 2007-0260 and 2007-0255 active to track and mandate the on-wing inspections. The new ACA suggested AD would mandate the new standard of heatshields to be installed at shop visit.</p> <p>This suggestion has the following benefits, in ACA's opinion:</p> <ol style="list-style-type: none"> 1) Reduces the total number of AD's on this subject (new and superseded). 2) Reduces the number of new AD's to be issued. 3) Simplifies the instructions in the new AD, reducing risk of mis-interpretation. 4) Easier for the airlines to incorporate, since on-wing inspections are already being tracked against the existing AD's. 5) Carries out the intent of PAD 09-004 and 09-005. 6) Would not necessarily require revision to existing AD's. 	Daniel McKinley Air Canada Propulsion Engineering, Trent 772	20/01/2009	See response to Chris Lee below.
Applicability	<p>In paragraph APPLICABILITY, the terminative action VSB is mentioned, it seems that situation is no longer possible on A/C ADs. It seems there is discrepancy regarding the Revision level of a "Non Modification SB" which should be the same in the whole PAD text, or provide additional information to justify in some paragraph it is not the same Revision Level.</p> <p>§ (1) [...] SB RB211-72-AE792 R4 [...]</p> <p>§ (2) [...] SB RB211-72-AE792 R3 [...]</p>	Gilles JANEZ LR continued airworthiness AIRBUS EAL - Product Integrity	09/01/09	The comment is partially agreed. If the VSB including the AD terminating action are already accomplished before the AD effective date, then the AD shall be logged as "not applicable", otherwise in case of SB accomplishment after the AD

	§ Ref. Publication [...] RR Non-Modification Service Bulletin RB211-72-AE792 Revision 3 [...]			effective date, the AD will be logged as “complied with”. Regarding the apparent discrepancy on the SB revision level, the comment is agreed, and the AD text is revised in order to clarify when the use of previous SB revisions is acceptable to comply with the AD requirements.
General Comment	<p>Currently RR inspection SBs 72-AE792 and 72-AF045 are mandated by EASA AD 2007-0255 & 0260. These ADs have terminating actions which end the requirement those inspections.</p> <p>Today I have reviewed PAD 09-004 and -005 which at first sight appear to revoke some of those terminating actions. In reality, the terminating actions <u>for the inspections</u> are the same. What has changed is that a new problem has been identified (fretage caused by inner rather than outer heat shields) and it seems that EASA want to amend and complicate existing ADs to address this new problem.</p> <p>This unnecessary complexity leads to two ADs mandating one Service Bulletin (72-F227).</p> <p>I propose that the existing ADs, which are currently confined to problems & inspections of the outer heat shield, are left as they are. The new problem (fretage caused by the <u>inner</u> heat shields) is separate from the problem addressed by those SBs & ADs. Can a simple, new AD be released that mandates 72-F227 in the time scale required? No mention need be made about the already complicated SB & AD status relating to the outer heat shields.</p> <p>A benefit of this is that everyone’s AD records – which currently state termination of the inspection by one of the current means in the ADs – need not be altered. If we go with the current scheme, the AD records will have to be changed to reflect termination in accordance with a different clause of the new AD. This is unnecessary.</p> <p>In summary:</p>	Chris Lee bmi engineering Technical Services	08/01/2009	<p>EASA agree with this comment and have reviewed the strategy with Rolls-Royce. It has been agreed that the inner fretage concern be considered separately from the outer fretage, and the need for AD action also.</p> <p>The concern remained however that the unchanged ADs still may lead operators who have not yet complied to taking the heatshield removal option which is now believed to occasionally introduce additional concerns. These ADs have therefore now been revised/superseded (for the addition of RB211 TRENT 772C-60 engine models to the AD Applicability) to facilitate the embodiment of the F227 as the closing action. This revision /supersedure consist of the extension to the closing date with a recommendation to apply F227 as the preferred closing action.</p>

	<p>i) A new AD dealing with this new problem would be better than two amendments to two already complicated ADs, which in addition would require awkward and unnecessary amendment to airline technical records.</p>			
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