



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-085
 CLOSED FOR COMMENTS ON: 29 July 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>The effect of Par. 2 is that you allow us to extend the inspection until 24 months after the effective date, but if we do the inspection now, we ground the A/C if we cannot read the P/N or have suspected bolts.</p> <p>I would prefer In Par. 2 that you will allow [further flight, e.g.] until next A-check until replacement (but not to extend the 24 months), for planning and logistic purposes, then I would be able to perform the inspection now and if I have the suspect P/N I can have the bolts, manpower and tools ready for the next A-Check.</p>	Kristian Mortensen, SAS	30/06/2009	The compliance time has been modified to take into account this comment. Refer to AD for further details.
Required Action(s) and Compliance Time(s)	<p>Comments to PAD 09-085:</p> <p>The subject proposed AD mandates that operators complete Airbus Service Bulletin number A330-71-3020 "...At the next engine installation but no later than 24 months after the effective date of this AD...". Airbus Service Bulletin number A330-71-3020 instructs the operator to perform P&W Service Bulletin number PW4G-100-71-35. P&W SB 71-35 recommends to inspect and remove suspect bolts of the forward and aft engine mounts "at the next engine removal, but not to exceed the next engine mount inspection interval (refer to Reference 5, Maintenance Planning Document), of 8,000 Cycles or 24,000 Hours".</p> <p>The compliance requirements for the proposed EASA AD and the P&W SB are not consistent. Operator utilization rates of the A330 would cause most operators to exceed the AD compliance while still being compliant to the P&W Service Bulletin.</p> <p>The P&W Service Bulletin has been released for 16 months and P&W anticipates that operators have established their work-scope planning such that the proposed EASA compliance requirement could force some operators to perform the inspection and replace</p>	Philip E. Papadakis Pratt & Whitney	10/08/2009	<p>The compliance time has been modified to take into account this comment. Refer to AD for further details.</p> <p>In the reason paragraph, failure has been replaced by "non conformance" as per your suggestion.</p>

	<p>the bolts before (inside) the normal engine removal interval. Replacement of the engine mount bolts is best performed in the frame of an engine removal.</p> <p>Therefore P&W is suggesting that the compliance of the AD be re-assessed in line with A330 operator's engine removal rates.</p> <p>In addition, paragraph 2 of the 'Reason' section of subject AD uses the word 'failure'. 'Failure' is commonly thought of as a fracture. The bolt found in service with the FPI indication was confirmed by investigation to be a manufacturing issue that was not a crack and had no fatigue propagation. P&W suggests that the word be changed to 'non-conformance'.</p>			
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