


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No. 15-060</b></p> <p><b>[Published on 08 May 2015 and officially closed for comments on 22 May 2015]</b></p>

**Commenter 1: DHL Aviation EEMEA B.S.C. (c) – Andrew O' Reilly – 12/05/2015**

**Comment # 1**

With reference to the SB 72-AH972 (30TH April 2015) and EASA AD 2015-0058 (9th April 2015), the criteria for removing our affected engine (31361) are in conflict. SB 72-AH972 (Driven by PAD 15-060) is mandating removal within 118FC or by 30/06/2015 while AD 2015-0058 is mandating removal within 45 Days or 118FC.

DHL Question:

1. As the PAD supersedes 2015-0058 will we now use the 72-AH972 removal criteria (see below) ?
2. Assuming the PAD does not change – when will the clock start counting for the 118 FC as specified in AH972 – I'm assuming 30th April 2015, correct ?

**EASA response:**

1. *EASA AD 2015-0058 will be legally superseded as soon as the Final AD for PAD 15-060 becomes effective (at the time of the effective date as mentioned in the AD). As of this effective date, the applicable compliance times for removal will be those specified in Rolls-Royce NMSB SB RB.211-72-AH972. By the way, note that the compliance time required by AD 2015-0058 is within 45 days or 100 FC (not 118 FC), whichever occurs first after the effective date of the AD.*
2. *As mentioned in Appendix 4, paragraph 5 of the Rolls-Royce NMSB RB.211-72-AH972, the flight cycle limit must be counted from the initial issue date of the NMSB, meaning from 22 May 2015.*

*No changes have been made to the Final AD in response to points 1 and 2 of this comment.*

**Commenter 2: American Airlines – Ben Taylor – 22/05/2015**

**Comment # 2**

EASA PAD 15-060 is issued for comment and was prompted by Rolls-Royce Alert Service Bulletin (ASB) RB.211-72-AH972, dated May 22, 2015.

AAL has reviewed EASA PAD 15-060 and provides the following comments:

1. AAL would like paragraph (1) in Reference 1 revised to include the RB211-535E4B-37 and RB211-535E4C to eliminate any confusion between this paragraph and

the Applicability section.

2. The process of recalculating and revising individual parts lives is a very labour intensive process. AAL would like to have the AD revised to provide 6 weeks of time, as Rolls-Royce Alert Service Bulletin (ASB) RB.211-72-AH972 does, to allow this recalculation process and time control system updates to be completed.
3. EASA PAD 15-060, paragraph (5) appears to conflict with Note 3. Note 3 states that parts listed in Rolls-Royce Alert Service Bulletin (ASB) RB.211-72-AH972, Appendix 4 are not serviceable parts. However, Paragraph (5) states it is allowed to install parts listed in Appendix 4, "provided that, prior to installation, it has been determined that no part, identified by P/N and s/n in Appendix 4 of the NMSB has reached or exceeded its applicable compliance time or re-calculated life, as applicable, and as specified in the NMSB." AAL requests either Note 3 be removed from the AD, or Note 3 be revised to permit use of parts as identified in paragraph (5).

***EASA response:***

1. ***Comment not agreed. Paragraph (1) is not applicable for RB211-535E4-B-37 and RB211-535E4-C-37 engines because Flight Profiles A and B are not applicable for those engines.***
  2. ***Comment not agreed. NMSB has been issued on 22 May 2015 and allows 6 weeks for determination, i.e. possible until 03 July which, incidentally, is already too late for the first removal date on 30 June. To avoid this potential conflict, the Final AD (issued today) becomes effective on 09 June 2015 and allows 21 days for determination -> possible until 30 June at the latest.***
  3. ***Comment agreed. Note 3 has been removed from the Final AD.***
- No changes have been made to the Final AD in response to points 1 and 2 of this comment.***