


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 15-138</b> <b>[Published on 09 November 2015 and officially closed for comments on 30 November 2015]</b>

**Commenter 1: Luftsport-Verband Bayern e.V. – Harald Goerres – 26/11/2015**

**Comment # 1**

Regarding the required action in (2.1) or (2.2) of PAD 15-138 to change of designation of an engine being installed in an aircraft may be very difficult or time consuming. As you can see in the example picture attached to this eMail the type label of the engine is often not accessible without removing a lot of engine parts/external equipment.



We therefore want to propose an alternative method:

As long as the engine is installed in the aircraft there seems to be no need to change the designation as long as the corresponding Form-One has been properly changed. A note on the Form-One should be placed by Certifying Staff that the type of motor is a "-01" and that the type label has not been changed so far. The tech log should also be changed to show the "-01" type.

If the engine is removed for overhaul or repair, the engine type label can be changed. The engine will get a new Form-One with correct data anyway.

If the engine is removed before the TBO is reached for the purpose to be built into another aircraft, the Form-One has to be passed on to that new aircraft. The Form-One will show the note that the type label hasn't been changed so there is the chance now to do so and the note on the Form-One should be deleted by the responsible Certifying Staff.

We hope this is a feasible solution too.

**EASA response:**

***Comment understood and partially agreed. It is EASA opinion that proper identification of the engine has to be accomplished in the shortest possible period; postponing this action to the next engine removal could increase the possibility of error or mistakes. Anyway, when – due to the peculiar installation on a certain aircraft type – the physical re-identification would require an "excessive" additional work, operators may require an extension of compliance time from their National Authorities (see also ["What is not an Alternative Method of Compliance \(AMOC\) to an Airworthiness Directive \(AD\)?"](#) on EASA website).***

***Due to several engine installations on different aircraft, verification of how many engine installations may require such extension would delay the issuance of the final AD. Consequently, also considering that no other similar comments were received, no changes have been made to the Final AD in response to this comment.***

**Commenter 2: Gerhard Pachowsky – 30/11/2015**

**Comment # 2**

Dieses AD-Proposal ist ein Beispiel dafür, wie man eine einfache Sache kompliziert darstellen kann um den "Umsetzer" der AD zu verwirren. Der laufende Bezug auf Tabellen und das Verlangen einer Änderungsgenehmigung des Inhabers der Musterzulassung sind wenig geeignet für eine zügige Aktion zur Umsetzung dieser AD. Das einfache Hinschauen auf den Motor zur Feststellung welchen Zylinderkopf man schließlich hat, genügt doch, die weiteren Schritte d.h. belassen, modifizieren (auch des Schmieröltemp-Anzeigegeräts), oder ausbauen vorzunehmen.

**EASA response:**

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