



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-064

[Published on 10 May 2016 and officially closed for comments on 07 June 2016]

Commenter 1: Lufthansa Technik AG – Alexander Böckling – 23/05/2016

Comment # 1

The new requirement (12) of PAD 16-064 references “instructions of Part 3 of RR SB RB.211-73-AJ366”.

I assume you wanted to refer to section 3. Accomplishment instructions. Since this SBE has two parts (page 7), the wording in the PAD should be changed to avoid confusion.

EASA response:

Comment agreed. The final AD has been modified accordingly.

Commenter 2: American Airlines – Hung Nguyen – 31/05/2016

Comment # 2

On the subject proposed Airworthiness Directive, American Airlines has a concern with the complexity of the new requirement to incorporate the terminating action with SB RB.211-73-AJ366. The prior terminating action, SB 73-AH619, had problem and RR had stop implementation. We are concerned that 73-AJ366 is also complex and it does not seem that experience has accumulated.

American Airlines would like to see more on-wing experience with 73-AH366 prior to implementation of the proposed ruling. Ideally, 6-12 months of on-wing service time would be ideal. This comment is coming from an operator who has been watching this issue for a long time and we appreciate that the ideal solution is not easy in this area of engine hardware.

EASA response:

Comment not agreed. The modification described is mandated as in-shop activity. The Agency considers the action specified appropriate..

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



Commenter 3: Cathay Pacific Airways – Anthony Shum – 01/06/2016**Comment # 3**

New requirements of this AD:

(9) During the next qualified shop visit (see Note 3 of this AD) after the effective date of this AD, modify the engine in accordance with the instructions of Part 3 of RR SB RB.211-73-AJ366.

Note 3: For the purpose of this AD, a qualified shop visit is where non-modular rework, or refurbishment, or check and repair, as applicable, is accomplished on the engine.

For the term non-modular rework, please kindly clarify the definition as we are unclear about what kind of work carry out on the engine will be classified as non-modular rework? The reason is that sometimes we will carry out the off wing repair/component replacement (i.e. fan case acoustic panels repair, SAGB replacement, fan blade replacement etc), which may not be resulted in shop visit and also will only last for few days, therefore it may not be ideal to incorporate the terminating modifications due to the short TRT.

As the term of non modular rework is too wide and to avoid misinterpretation we request the term non modular rework is removed from the AD.

EASA response:

Comment partially agreed. Following discussion with the engine TC holder a change is made to the text of the final AD, which is consistent with the TC holder's NMSB.

