



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-135

[Published on 20 September 2016 and officially closed for comments on 18 October 2016]

**Commenter 1: Lufthansa Technik – Stephanie Schott – 17/10/2016**

### Comment # 1

- A. Note 2: All the Service Bulletins listed here have been revised. Why is there shown '(any revision)' only with SB 73-AG948? Could you please add '(any revision)' close to every SB or delete it at SB 73-AG948?
  - B. Paragraph (3): Please clarify if also 'Hospital Shop Visits' require an inspection i.a.w. this AD, e.g.: [...] During each engine shop visit (including hospital shop visits) and during each engine overhaul [...]
  - C. Note 3: Please clarify statement: from "[...] may substitute [...]" to "[...] substitutes [...]" to ensure there is no doubt that in-shop inspection substitutes on-wing inspection. Please define "substitute" in separate note. Does the accomplishment of a shop visit inspection set the on-wing counter on zero EFH?
  - D. Paragraph (4):
    - 1. The LP Fuel tubes are always exposed as long as the engine is not prepared for shipment or installed on an aircraft. Therefore the area is always exposed when the engine is in-shop and it would help to delete the section "to the extent where the affected parts are exposed".
    - 2. Please exchange the wording "before release to service" by "before dispatch of the engine" to ensure that engines currently parked as spare engine are not affected by this AD.
    - 3. Please clarify that inspections on spare engines already accomplished i.a.w. Revision 1 or Revision 2 of SB 73-AG948 are compliant with the requirements of this AD.
  - E. Section Ref. Publication(s): Please add SB 73-F737, 73-F738, 73-AG797, and 73-G723 in the referenced publications.
- Lufthansa Technik would highly appreciate if EASA takes our annotation into consideration when finalizing upcoming AD.

### EASA response:

- A. Comment agreed. The Final AD has been amended accordingly.**
- B. Comment agreed. A Note has been added in the Final AD, to clarify which shop visits are 'qualified' for the purpose of this AD.**



- C. Comment partially agreed. The use of the word 'may' does not signify any doubt, but rather that this is an 'allowance'. The wording of the Note (renumbered Note 5) has been amended to clarify this point.**
- D.1 Comment agreed. The Final AD is amended to include a reference to the new Note 4 (see EASA answer to point B. above.**
- D.2 Comment not agreed. This action clearly applies to engine in a shop visit, which by default excludes engines held as spare, which should be ready to be installed.**
- D.3 Comment not agreed. This AD re-starts inspections previously introduced, but does not require these new (NMSB at Rev.3) inspections before its effective date, therefore no credit needs to be given for previous actions per the NMSB at an earlier revision level.**
- E. Comment not agreed. These publications do not contain instructions for actions required by this AD, and cannot be used for compliance with any required action.**
- No changes have been made to the Final AD in response to points D.2, D.3 and E. of this comment.**

