



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-177

[Published on 22 December 2016 and officially closed for comments on 19 January 2017]

**EASA has withdrawn PAD 16-177 – see published Decision**

**Commenter 1: Air France – Loic Bourdais – 13/01/2017**

### Comment # 1

Paragraph (5) Part / Engine Installation:

“From the effective date of this AD, it is allowed to install an engine on an aeroplane, or a new / replacement P30 sense line air tube in an engine installed on an aeroplane, provided the P30 sense line air tube is compliant with paragraphs (1) and (3) of this AD.”

Comment: it has been identified some circumstances for which the requirements of the AD cannot be met.

Example of scenario: unscheduled Engine#2 removal (AOG). Replacement engine has 0 cycle since inspection per NMSB 73-AH925 R02 whereas opposite Engine#1 was inspected 10 cycles before during previous routine check. In this situation, the 20 EFC offset between the two inspections is not met and therefore, as this is mandatory per AD requirement, the configuration is not airworthy and aircraft would be grounded.

Please, can the EASA study the possibility to add a paragraph in the AD to cover this type of situation (reduced interval for one of the two engines until the 20 EFC offset is met for example). Or, by anticipation, to prepare Alternative Methods of Compliance that would be released quickly on a case by case basis for an aircraft on AOG.

### EASA response:

**Comment agreed, but no longer relevant. PAD 16-177 has been withdrawn and no Final AD will be published at this time.**

**Commenter 2: Cathay Pacific Airways Limited – Anthony Shum – 19/01/2017**

### Comment # 2



After reviewing the EASA PAD No. 16-177 Cathay pacific would like to provide you feedback regarding two issues on Paragraph (2), stating “the inspection as required by paragraph (1) of this AD for each engine must be accomplished with a minimum of 20EFC inspection offset between the engines installed on that aeroplane.” I would like to put the following proposal forward for your consideration:

- A. Previous communication from Rolls-Royce confirmed that by incorporating the latest EEC software 4.2.2 as per RR NMSB 73-AJ707 (Airbus SB 73-P003) could terminate the staggering requirement as required in RR NMSB 73-AH925 Rev02. In light of this, could this Paragraph (2) include this software upgrade as an alleviation of the 20 cycles staggering requirement for any engines which had the latest EEC software 4.2.2 or above installed as per either the RR NMSB 73-AJ707 or the Airbus SB 73-P003?
- B. If in any scenario that the inspection as per paragraph (1) was done in less than 20 cycles offset between sister engine for any reason, could paragraph (2) add a further statement like “in the case the inspection was carried out with less than a minimum of 20 cycles offset, the most recent inspection must be discounted and it must be re-done once 20 cycles minimum offset limit since the last accomplishment of paragraph (1) inspection is reached.” This is to provide an exit criteria on any engines which may have the inspection as per paragraph (1) carried out in less than a minimum of 20 cycles inadvertently.

**EASA response:**

**A. Comment agreed, EASA has now concluded that the PAD maybe withdrawn on this basis.**

**B. Comment agreed. See EASA answer to Comment #1 above.**

**Commenter 3: Lufthansa Technik AG – Binai Mathew – 19/01/2017**

**Comment # 3**

With regard to PAD 16-177, Trent XWB P30 Sense Line Air Tube inspection, we have the following comments:

- A. The inspection and draining in accordance with RR SB 73-AH925 Rev 2 is applicable and required according to Rolls-Royce SB policies during shop visits. This is also allowed in accordance with paragraph 5 of the PAD. This essentially will reset the accomplishment on wing for the engine position when this engine is installed on an aircraft. How the accomplishment in shop is accommodated into the on-wing policy, especially with regard to the requirement of maintaining minimum of 20 FC between the two engine positions when engine change is made is unclear.  
  
For example, if an engine change occurs at position 1 when the inspection on engine position 2 is due in less than 20 FC since the mentioned engine change on position 1, how do we proceed? If we delay the inspection on Engine 2 to maintain 20 FC off-set, it will not have compliance with the repeat interval requirement of 100 FC. If we perform according to 100 FC requirement, we do not comply with the 20 FC off-set requirement.



The same is true, if an inspection was performed on say engine position 1 and within 20 FC an engine change was required at engine position 2. How are we to provide compliance?

- B. It was our understanding that the EEC Software update which has been instructed via Aircraft SB 73-P003 and RR SB 73-AJ707 addresses the dual event issue, or at the least alleviates the safety concerns due to dual event. The EEC Software version and its effect on the requirement of off-set between engine positions are not stated. Is it EASA's view that the software improvement has no effect on safety improvement or could this be considered when issuing the AD?

***EASA response:***

***A. Comment agreed. See EASA answer to Comment #1 above.***

***B. Comment agreed. See EASA answer to Comment #2, point A, above.***

