



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-031

[Published on 16 March 2017 and officially closed for comments on 30 March 2017]

Commenter 1: American Airlines – Tim Cory – 30/03/2017

Comment # 1

- A. Under 'Applicability', change 'all serial numbers' to 'see Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) RB.211-72-AJ463 effectivity'.
Rationale: All ESNs are not effective.
- B. Under 'Reason', change 'To address this potential unsafe condition, RR identified the affected engines that have these A-frame hollow locating pins installed and intends to publish Alert Non-Modification Service Bulletin (NMSB) RB.211-72-AJ463, providing instructions for replacement of these pins. A draft of that NMSB is currently available on Rolls-Royce Care (see ref. WW11346-1 dated 15 March 2017) to invite operator comments.' To 'To address this potential unsafe condition, RR identified the affected engines that have these A-frame hollow locating pins installed and has published Alert Non-Modification Service Bulletin (NMSB) RB.211-72-AJ463, providing instructions for replacement of these pins.'
Rationale: RR NMSB is still out for comment, which may be revised based on operator feedback.
- C. Under 'Required Action(s) and Compliance Time(s):', Note 4, delete '[to be published]'. Rationale: RR NMSB is still out for comment, which may be revised based on operator feedback.
- D. Under 'On-wing Replacement:', Note 5, change '...engine installed that is close to, or has exceeded, the applicable compliance time, a single ferry flight...' to '...engine installed that has exceeded the applicable compliance time, a single ferry flight...'. Rationale: Requirements of the AD are not applicable to those engines 'approaching' the compliance time.
- E. Under 'In-shop Replacement:', Note 6, change '...subject to a serviceability check and repair,...' to '...subject to a serviceability, check and repair,...'.
- F. Regarding the balloted RR NMSB, AAL has submitted through its local Rolls-Royce representative, the attached comments that will be considered in the release of the NMSB.

EASA response:

A. Comment not agreed. The Applicability of the AD is determined by the nature of paragraph (4) of the AD: to ensure the installation prohibition applies to all engines, not only to those that have the part installed at this time. Consequently, the AD applies to all engines for which the



'affected parts' are eligible for installation, while only those that have the part installed must take corrective action. No changes will be made to the Final AD in response to this comment.

- B. Comment partially agreed. The Proposed AD refers to a version of the NMSB that is not 'published' in the sense that the instructions are final. Those instructions cannot be considered 'approved' and should therefore not (yet) be applied in service. Nevertheless, since EASA cannot issue a Final AD for an NMSB that is still 'on ballot', the AD will only be published after the NMSB is finalised (post-ballot) and is officially published. The Final AD will therefore refer to the 'published' NMSB, not to the 'ballot' NMSB anymore and the related AD text will be further amended accordingly.***
- C. See EASA answer to comment B. above.***
- D. Comment not agreed. After the effective date of the Final AD, an engine installed on a stored aeroplane, about to be brought back to service, can be 'close to' or have exceeded the compliance time stated in the NMSB. The Note provides for flexibility for engines installed on those aeroplanes. No changes will be made to the Final AD in response to this comment.***
- E. Comment agreed. The Final AD will be amended accordingly.***
- F. Comments noted and appreciated.***

