



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-033

[Published on 17 March 2017 and officially closed for comments on 14 April 2017]

**Commenter 1: Avianca Brasil – Reinaldo Bortolote Nascimento – 13/04/2017**

### Comment # 1

The AD 2017-0003 and the RR SB 72-AH976 R01 are applicable to engines post repair FRSC005 and have a list of ESN and modules SNs that are subject of FPI.

The PAD 17-033 and the RR SB 72-AH976 R02 removes the list of ESNs, resulting in further doubts in regards of its real applicability. In Avianca Brasil's case, the ESNs of our fleet were not listed at the SB 72-AH976 R01 version, and never went to shop visit, meaning that the engines are not affected by the AD 2017-0003, the RR SB 72-AH976 (all revisions), nor PAD 17-033 requirements.

We need that the new AD have clear wording/requirements for engines that were never repaired.

### EASA response:

**Comment understood, but not agreed. As the “Reason” section of the PAD explains, “some doubt exists whether all post-repair FRSC005 engines are identified in the original NMSB”, a new AD is necessary to ensure that all engines are inspected (§1 requirement) to identify those with ‘FRSC005’ etched on the CIC. Further inspection (FPI) and corrective action §(2) is ONLY required for those engines with a CIC having this marking.**

**In addition, in case an ‘affected’ CIC is installed on another (not affected) engine, §(4) requires the necessary actions.**

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

