



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-067

[Published on 06 June 2017 and officially closed for comments on 04 July 2017]

Commenter 1: MTU Maintenance Lease Services B.V. – Klaas Nijhof – 07/06/2017

Comment # 1

Our mount is recently inspected i.a.w. CMM 71-21-08 Rev 48 during last inspection, part released 31-JAN-2017.

Does this automatically fulfill the needs of the PAD and upcoming AD?

Repair 10 is not stated in the paperwork that this is performed.

EASA response:

EASA confirm that, for CFM56-5B engines, an engine mount, that did pass an inspection in accordance with Goodrich Aerospace CMM 71-21-08 rev. 48, and that, after that inspection, was not repaired in accordance with the instructions of CMM 71-21-08 repair 10, is not affected.

Please note that local CAAs, and not EASA, is responsible for AD enforcement

Commenter 2: SmartLynx Airlines Ltd. – Romans Zincenko – 08/06/2017

Comment # 2

We expect to have a problem with installed forward engine mount main beam assembly PN identification as this part doesn't go with engine to the shop. Could you please advise if it will be possible to identify installed engine mount main beam assembly PN based on Airbus SB A320-71-1065 and SB A320-71-1066 applicable MSNs?

EASA response:

Using maintenance records to determine aircraft configuration is in principle acceptable, provided those records are reliable. Local CAAs are responsible for AD enforcement and, if in doubt, EASA recommend to seek for CAA advice.



The applicable MSN as listed in the SBs are based on aircraft configuration at delivery and other information available to Airbus. Consequently, the information provided in the SB has to be read in conjunction with maintenance records.

Commenter 3: Lufthansa Technik AG – Carsten Burk – 26/06/2017

Comment # 3

3A) I would like address a concern/complaint in regards to the understanding/content of PAD 17-067 in relation to SB A320-71-1065 with corresponding SBC RA32071-159. The content of the documents give different understandings in applying the necessary actions to comply with the corresponding Requirements:

The PAD tells: for Group 1 aeroplanes within 48 months, or 10.000 flight cycles, or 15 Flight hours, whichever occurs first after the effective date of this AD, replace each affected main beam in accordance with the instruction of applicable SB A320-71-1065 and A320-71-1066.

While the SB A320-71-1065 tells: It has to be verified, if the CMM 71-21-08 Repair 10 (Revision 1 to 46) was applied on the Engine Mount snouts assembled on CFM56-5A & -5B Engines (CMM 71-21-08 Revision 47 is applicable since 15.07.2016) according Compliance time 10.000 FC/ 15.000 FH (see SB A320-71-1065 page 25/26). Or at Engine removal:

If the Repair 10 has been applied, a corresponding special detailed inspections has to be launched before next flight (see SB A320-71-1065 page 26-29).

By checking the Maintenance records, it is today not clear what result will be achieved in regards to findings. Therefore a Grace period of “before next flight” is not realizable. The risk of grounding a big part of the fleet would be very high in case of an AD note.

The current understanding of the SB and corresponding Flow chart (page 47) give a wrong understanding. In this relation the SB should give a grace period for checking the Maintenance records (low grace period) and give another grace period (e.g. 10.000 FC / 15.000 FH) to perform the inspections.

The PAD does just give the requirement to replace the affected parts within a grace period of 48 months, or 10.000 flight cycles or 15.000 flight hours. It would be very helpful to synchronize the documents to the content of the PAD to prevent corresponding misunderstandings. Please consider not to implement the requirement “before next flight” within the upcoming EAD related to the above mentioned high burdens.

LHT would suggest to implement the compliance limit of 48 months or, 10.000 FC or 15.000 FH or at Engine removal, whichever occurs later as a general grace period to perform the review of the maintenance records as well as a replacement of affected parts within the upcoming EAD.

3B) An Additional Point is the discrepancy of the intent of SBC RA32071-159 vs. SB A320-71-1065.



The SBC tells if Inspected or repaired meet the requirement of CMM 71-21-08, while SB A320-71-1065 only uses the phrase Repaired, which is less conservative. Please clarify if the records have only to be checked in regards to Inspection and/or Repair!

The question in this relation: Would there be any restrictions, if only inspections according CMM 71-21-08 Repair 10 has been applied?

It is highly appreciated that the content of the referenced PAD & SB's will be synchronized of the upcoming EASA AD to prevent very high burden and misunderstandings for each operator.

3C) Moreover there is a Typo within the PAD related to the SBC RA32071-159. The PAD tells SB RA320171-159 instead of SBC RA32071-159.

EASA response:

3A) The PAD identifies a compliance time to replace an affected part, but does not identify a compliance time to determine whether a part is affected. Operators may hence determine whether a part is affected any time within the compliance time for part replacement. EASA recommends to accomplish the determination as early as possible, and schedule part replacement accordingly.

EASA does not agree in including next engine removal as a driving factor to determine the compliance. Due to the "whichever occurs later" approach, a not scheduled maintenance, such as the engine removal, could lead to uncontrolled compliance time

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

3B) EASA confirms that an engine mount is affected if it was repaired iaw CMM 71-21-08 repair 10, revision 01-46. An engine mount that has been repaired in accordance with instruction other than CMM 71-21-08 repair 10, and that was released to service based on information contained in Repair 10 has to be considered as affected, unless otherwise stated by Airbus or Goodrich.

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

3C) Comment agreed: the final AD has been updated accordingly

