



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-133

[Published on 29 September 2017 and officially closed for comments on 27 October 2017]

Commenter 1: Helvetic Airways AG – Alexandros Ioannidis – 27/10/2017

Comment # 1

Based on our long e-mail discussion with Rolls Royce about TAY-72-A1833 (related to PAD 17-133), we would like to ask you the following:

1. The SB suggests two controlling methods for the identifying the number the DFL re-applications. One is through our maintenance records and our maintenance controlling system and a second one through a physical read-out after marking the dovetail of the blades at the time requirement that is described in the part B of this SB. While we can implement the first, we have doubts about the clarity of RR instructions about the second. Please refer to the last e-mail (first two questions and answers) below, and let us know if EASA believes that this is acceptable. We believe that the words/expressions such as “hint”, “usually”, “free to use our own system” indicate that Rolls Royce believes that it is acceptable that our mechanics might fail recognizing if part B of this SB has been performed. This is not very usual for an AD related SB.
2. Given the minor changes that we suggested which will be implemented in a new SB revision and the unclear answers we received concerning the implementation and controlling of Part B, we would like to know, if EASA is planning to postpone the issuance of this AD.

EASA response:

Comment #1: Disagreed: The content of a SB is an obligation of an approved Design Organisation. Nevertheless, EASA is interested in having clear instruction within the subject RRD SB. We will discuss the concern with RRD. Therefore, we understood the comment is not against the EASA PAD wording.

Comment #2: Disagreed: See response to subpart 1. In addition operators are free to contact the TC-holder for clarification and support.

