



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-144

[Published on 09 October 2017 and officially closed for comments on 06 November 2017]

Commenter 1: Fiji Airways – Aakash Sharma – 13/10/2017

Comment # 1

PAD No.: 17-144 will mandate the inspection for LPC Blades to be carried out at an interval of 1200FC. I would like to provide my comments for PAD No.: 17-144 before it is published.

As per AD 2016-0141, these inspections were carried out at an interval of 2400FC which enabled this inspections to be carried out successfully in C Checks for Fiji Airways fleet. Moreover, As per SB 72-AH465, inspection for the LPC blades needs to be carried out by technicians who meets certain skills and training requirements, C Check is the best instance for FJI to carry out the inspection of the LPC blades in an MRO facility where the technicians with the specified skillset and training are available.

Since PAD No.: 17-144 proposes to reduce the interval of the inspections to 1200FC, the task will now fall due outside of C-Check. This will place burden on Fiji Airways to perform this inspections outside of C-Check when suitable ground time and access to suitably qualified and trained technicians would be a challenge.

Based on the comments provided above, I would like to request the compliance interval defined in the PAD No.: 17-144 be reconsidered. An interval of 1500FC would allow FJI to perform this task in C-Checks.

EASA response:

Comment not agreed. The inspection interval has been established in consultation with the type certificate (TC) holder and is considered appropriate with respect to the risks associated with fan blade release. Furthermore, the 1200 cycle inspection interval coincides with the scheduled fan blade root relube recommendations as published by the TC holder, when operators will already be removing the subject fan blades from the fan disc in order to perform other maintenance. EASA suggest that the operator contacts his State of Registry authority to evaluate his individual maintenance programme (schedule). No changes have been made to the Final AD in response to this comment.

Commenter 2: Cathay Pacific Airways – Anthony Shum – 03/11/2017



Comment # 2

NOTE 3 stated Group 2 engines are those that do not have an affected blade installed. At the current available in services Trent 700 fan blades, they are all affected by this Phased Array inspection, so Group 2 engines are not existed in current worldwide fleet status. Therefore, if the intention of this Group 2 engines is reserved for future purpose where RR may design a new standard of fan blades which will not be affected by this Phased Array inspection?

EASA response:

Comment agreed. EASA have reconsidered the need to take future P/N into account. The group definitions have been removed from the Final AD accordingly.

Commenter 3: Lufthansa Technik – Pedro Ortiz Vivancos – 03/11/2017
Comment # 3

- A. In Note 3 reference is made to Group 1 and Group 2 engines, being group 2 engines those not equipped with an affected blade defined in Note 2. This classification is new and it is not clear why this has been added. Further, it leads to confusion as to our knowledge all commercially available Fan Blades are affected. If there is a non-affected Fan Blade available It should be clarified and added as reference. Otherwise please delete classification in groups.
- B. Several times reference is made to RR NMSB RB.211-71-AH465. Correct reference should be RR NMSB RB.211-72-AH465 (Reason; Note 4; Para 5.1)
- C. According Para 5.1 installation of Fan Blades with less than 1200FC since new or inspected is allowed. This covers all possibilities and Para 5.2 has no additional value as it is included in Para 5.1. Please delete Para 5.2
- D. "For the reason described above, this AD retains the requirements of EASA AD 2016-0141, which is superseded, but reduces the inspection threshold." The interval is being changed, too.

EASA response:

A. Comment agreed. See answer to Comment #2 above.

B. Comment agreed. This is a reference to an incorrect copy of the PAD which was inadvertently published, containing these typographical errors. EASA replaced that shortly after publication with the correct PAD document.



- C. Comment disagreed. Since the previous interval was 2 400 FC, there could very well be spare blades that were previously inspected, but have exceeded 1 200 FC (the new interval) since that last inspection. Paragraph (5.2) addresses that population. Note that paragraph (5) states “as required by paragraph (5.1) or (5.2), as applicable, ...etc.”. No changes have been made to the Final AD in response to this comment.*
- D. Comment agreed. The Final AD has been amended accordingly.*

