



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-110

[Published on 26 January 2018 and officially closed for comments on 23 February 2018]

**Commenter 1: Cathay Pacific Airways – Anthony Shum – 21/02/2018**

### Comment # 1

I'm currently reviewing the EASA PAD No. 18-010 and would like to ask for clarifications on paragraph (1) and (6) and to also seek for adding credits for the previous modification.

- A. At the beginning of Paragraph (1) mentioned "...as specified in the NMSB (see Note 2 of this AD), however Note 2 is missing from the PAD. Please clarify what is the content of Note 2.
- B. At the end of Paragraph (1) mentioned "Section 1.D.(1) of the NMSB contains the details on how to determine the applicable SDC.", the NMSB 72-AG270 Revision 5 Section 1.D.(1) is referring to the Standard Operation which is in Flight cycles, where Section 1.D.(2) is for the Non-Standard Operation in SDC, so CPA think the reference should be changed to Section 1.D.(2) instead of Section 1.D.(1).
- C. Paragraph (6) mandates the modification of the engine iaw the instructions of RR SB 72-AG402 however it didn't specifically mentioned the revision of the SB. The Ref. Publications section of the PAD contains SB 72-AG402 Revision 2 and also with the wordings of "the use of the later approved revision is acceptable for compliance". So to fulfil this paragraph (6) the modification must be carried out iaw SB 72-AG402 Revision 2 or later revision. For engines that had the modification done at the previous revision of SB 72-AG402 (before Revision 2) cannot be deemed as compliance of this paragraph (6) and thus cannot be deemed as the termination action per Paragraph (7) and will required repeat inspection as per Paragraph (1). In turn, the existing EASA AD 2014-0152 Correction Paragraph (7) provides credits to both the inspection and modification accomplished before the effective date of this AD, iaw all referenced SBs and NMSBs at any previous revisions. CPA would like to request to have the same credits on modification to be added in Paragraph (8) [or adding a new Paragraph specifically for credits on previous modification] such that engines that had SB 72-AG402 done at previous revisions [before Revision 2] could take the credits and deemed compliance on Paragraph (6).

### EASA response:

- A. Comment agreed. The reference to Note 2 has been removed from the Final AD.**
- B. Comment agreed. The Final AD has been amended accordingly.**
- C. Comment agreed. All previous revisions of RR SB RB.211-72-AG402 have been added in section Ref. Publications of the Final AD.**



**Commenter 2: Lufthansa Technik – Alexander Böckling – 21/02/2018**

**Comment # 2**

- A. Para 1 of PAD references Note 2. We couldn't find neither Note 2 nor a Note 1 in the PAD.
- B. Para 1 of PAD states that "On-wing inspections are not required for engines that have SB (mod) 72-G402 incorporated." Para 7 (Terminating action) leads to the same conclusion. To avoid duplication of statements regarding terminating action, the quoted statement should be deleted out of Para 1.

**EASA response:**

- A. Comment agreed. See EASA answer to Comment #1, Point A.**
- B. Comment agreed. The Final AD has been amended accordingly.**

**Commenter 3: HONG KONG AERO ENGINE SERVICES – Grace Lee – 22/02/2018**

**Comment # 3**

Having reviewed the PAD18-010 and AD2014-0152, I would like to confirm if the repeater EC inspection to SB72-AG085 is **NOT** required on post SB72-AG402 (T700) / post SB72-AG401 (T800) IPC Rotor shaft?

**EASA response:**

**Comment not agreed. The Reason section of the Final AD explains that, during a previous evolution of this AD (AD 2013-0002), a mistake was made, inadvertently indicating that mod 72-(A)G402 (Trent 700) and -(A)G402 (Trent 800) also allowed terminating the in-shop inspections. AD 2014-0152 was issued to correct that error, because the "modifications constitute terminating action only for the repetitive on-wing inspections".**

**In addition, paragraph (7) explicitly states that modification of an engine "constitutes terminating action for the repetitive on-wing inspections as required by paragraph (1) of this AD for that engine". Consequently, paragraph (2) remains required for post-mod engines.**

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

