



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-062

[Published on 27 April 2018 and officially closed for comments on 25 May 2018]

Commenter 1: Lufthansa Technik AG – Rene Schinkel – 24/05/2018

Comment # 1

- A. The statement „Where, in this AD, reference is made to a RR Mod, SB or NMSB with an ‘A’ (Alert) in the number, it should be recognised that an earlier or later revision may not have that ‘A’. This kind of change does not effectively alter the publication references for the purpose of this AD“ should be stated separately, as the current location means for us that it is only applicable to “the SB” and not to “the NMSB”.
- B. Par. (6) refers to the “ALS”. This statement has a very high risk to be mixed up with the Aircraft ALS document. Please predefine the “ALS” upfront, as Time Limits Manual Task 05-20-01-800-801 paragraph L or directly refer to the TLM rather than ALS.
- C. Par. (7): what is the technical reason for the embodiment of the SB until 30th September 2025? You already predefined the qualified shopvisits. As Generic EMP and customer EMP’s define when a refurbishment etc. has to take place the embodiment rate is predefined per these documents and the PAD. If you wish to have a higher rate, this should be reflected by adding the Hospital Shop Vists to qualified shopvisit section.
- D. Par. (9): please add the statement in bold: “Modification of an engine as required by paragraph (7) of this AD constitutes terminating action for the repetitive inspection requirements as required by paragraphs (1) and (2) of this AD for that engine”.

EASA response:

- A. Comment agreed. The text has been moved to indicate a more general relevance.**
- B. Comment agreed. The Final AD has been amended accordingly.**
- C. Comment noted. The closing date allows an embodiment rate that can be adequately managed by operators. There is no need for a ‘higher’ implementation rate. It should be emphasised that AD compliance time is a reflection of the risk, not an invitation to delay corrective action until the end of the compliance time. No changes have been made to the Final AD in response to this comment.**
- D. Comment partially agreed. The references to §§(1) and (2) has been added to the Final AD. There is no need to emphasise (i.e. in bold) this statement as it is clear enough.**

