



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-087

[Published on 26 June 2018 and officially closed for comments on 24 July 2018]

Commenter 1: Etihad Airways – Borja Dosal Roiz – 27/06/2018

Comment # 1

Paragraph (2) refers to the Part Installation and says that “it is allowed to install an affected part on any engine, provided the part is new, or it is determined that the part has not exceeded 865 FC since its first installation on an engine”.

We would like EASA to consider the inclusion of Overhauled parts, as the part can be either new or overhauled and in both cases the counter of Flight Cycles is reset to zero.

EASA response:

Comment not agreed. There are no approved overhaul instructions for this part that would result in a full life re-set.

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

Commenter 2: All Nippon Airways – Rie Sota – 24/07/2018

Comment # 2

HP Turbine Disc Cover Plate life is already declared as 865 flight cycle in accordance with Rolls-Royce Time Limited Manual 05-10-01-800-801 (Rev Date: Apr 24/2018) approved by EASA. Could you please let us know why EASA will issue AD for this life reduction even if RR TLM already changed?

EASA response:

Comment understood. Please review the related [AD FAQ](#), explaining why EASA issues ADs for life limitations.

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

