



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-106

[Published on 26 July 2018 and officially closed for comments on 23 August 2018]

Commenter 1: Airbus – Marie Kuntzmann – 31/07/2018

Comment # 1

[Airbus have] a question regarding the following sentence in PAD 18-106 and the definition of “first operation of the engine”:

Inspection:

(1) Within the compliance time specified in Table 1 of this AD, as applicable, or within 24 months after first operation of the engine...

For [Airbus], the inspection is under customer responsibility, 24 months after ferry flight to the customer as this is the first flight operated by the customer. But is there an official definition of “first operation of the engine”?

EASA response:

Comment noted, but not agreed. The intent of the AD is to refer to the first time the engine was flown, not its first flight in commercial operation. Although there may not be any official/formal definition for ‘first operation of the engine’, we consider that ‘first operation’ is generally understood to refer to the first flight of the engine, i.e. the first (test) flight by the manufacturer after the aircraft leaves the production line.

EASA concurs that it is always the owner/operator who must comply with the AD, and this compliance time “after first operation of the engine” is to ensure that, for new engines, the 24 months compliance time is not to be counted from the AD effective date (which would be too restrictive), hence the “whichever occurs later” in paragraph (1).

Clearly, it is NOT the intent that each operator decides on which date the ‘first operation’ of an engine took place – similar to aircraft, all engine flight cycles are recorded, plus the flight dates, so finding the first operation (not counting ground test runs) should not be difficult. In case of possible (mis)interpretation, the competent authority of the State of Registry of the aircraft on which the affected engine is (to be) installed should decide, possibly based on (if requested) EASA advice.

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



Commenter 2: Lufthansa Technik AG – Peter Brudler – 27/08/2018**Comment # 2**

Please be informed about LHT comment for the PAD 18-106 knowing the [public consultation] deadline is already exceeded.

From LHT point of view a comment is required in the AMM installation procedure providing the requirement of the (planned) EAD, that during “Part Installation (5) it must be obeyed that a serviceable part is to be installed (information must be provided in the Form 1 paperwork that this part is a serviceable part iaw the requirements of the planned EAD).

If this can’t be ensured by RR, a Repeater TV or equivalent is required providing this information to the maintenance.

Please take LHTs point of view into consideration for the planned EAD. Sorry for any inconvenience this late response may cause on Your side

EASA response:

Comment understood, but not agreed. In EASA view, there is no need for Airbus or Rolls-Royce to amend the Aircraft Maintenance Manual for this purpose, although we concur that it might be helpful. The fact that the AD requires operators to verify that each replacement part is an “An affected part that is new (never installed on an engine), or has passed an inspection, before installation, in accordance with the instructions of the NMSB” can be managed through (a change to) the operator’s approved Aircraft Maintenance Programme, or any other method that is acceptable to the competent authority (State of Registry of the affected aircraft), as long as it meets the intent of the AD.

It should also be noted that the AMM, by itself, is not a ‘required’ document. Any change to (i.e. new task in) the AMM that is related to (i.e. necessary to prevent) an unsafe condition would need to be subject of an AD, due to international agreed convention/procedures. Since the AD (§§ 5, 6 and 7) already requires this prior-to-installation-verification, without specifying exactly how to accomplish it, mandating the use of a specific AMM task for this purpose would remove the flexibility that would otherwise be available to operators.

We concur that a Form 1 of a released part should specify whether a part is new, or has passed an inspection in accordance with the instructions of the NMSB, as applicable. In our view, there is no need to (also) include a reference to the AD. Note that these would likely be in-shop actions on individual components, while EASA can only require measures by AD when in relation to the installation of such a component on the product to which the AD applies. However, we trust that both Rolls-Royce and Airbus have already conveyed that information to the relevant shops, ensuring proper Form 1 release.

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

