



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-160R1

[Published on 11 January 2019 and officially closed for comments on 25 January 2019]

Commenter 1: Solaseed Air Inc – Akinari Asahi – 07/12/2018

Comment # 2

CFM56-7B SB 72-1033 Rev.3 shows the compliance of repeat inspection as below:

1.A.(1)(d) Repeat the inspection as per this Service Bulletin every 1,600 Flight Cycles after the initial inspection.

2 If the initial Fan Blade inspection was completed before 15,400 Flight Cycles Since New, it is allowed to defer the first repeat inspection until the Fan Blades accumulate 17,000 Flight Cycles Since New.

I think this means 15,400 FC + 1,600 FC is almost 17,000 FC. However, EASA PAD 18-160R1 was not included that requirement.

For example, when the Initial inspection is performed at 14,500 FC, **initial repeat inspection** of **SB requirements** is until 17,000 Flight Cycles Since New and it means/allows to defer 2,500 cycles until first initial inspection, but **initial repeat inspection** of EASA PAD will be until 16,100 Flight Cycles Since New and it has never additional cycles.

We request to add the compliance requirements as shown in CFM56-7B SB 72-1033 Rev.3, 1.A.(1)(d),2 to new EASA AD(EASA PAD 18-160R1).

I commented the same request on EASA PAD 18-160R0. We would like EASA to re-considering about this comment because this difference of compliance regarding the initial repeat inspection will be big impact on our revenue flight planning

EASA response:

Comment noted. As a general rule, if a previous inspection has been recorded as compliance with an AD requirement, subsequent inspection must be accomplished within the interval(s) as specified in the AD. Vice versa, if an inspection, accomplished well before the initial threshold, has not been recorded as compliance with the AD, subsequent inspection, as required by the AD, may be accomplished before exceeding the threshold as identified in the AD for the initial inspection.

Note that a similar question was presented during the AD reading exercise, at the AD workshop hold on 20/21 November 2018. Events proceeding are available at this [link](#). Please refer to “Airworthiness Directive Reading Exercise 2018 - Reading of AD 2018-0093-E”.



To be also noted that the new AD will supersede AD 2018-0211, identifying new threshold for the initial inspection. The new AD has no restatement of any requirement from previous AD. On the effective date of the new AD, an operator is allowed (but not required) to take credit for an inspection already accomplished, under the clause “unless accomplished previously”: in this case, subsequent inspections must be accomplished at intervals not exceeding 1600 FC. If the operator does not record any previous inspection as compliance to the requirements of the new AD, first inspection is due as required by paragraph (1) of the new AD.

Finally, please note that EASA is not responsible for AD enforcement. National Aviation Authorities (State of Registry) are in charge for that. You may also seek their advice.

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

