

COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-173

[Published on 13 December 2018 and officially closed for comments on 10 January 2019]

Commenter 1: Advanced Military Maintenance Repair and Overhaul Center – Safiuddin Mohamad – 16/12/2018

Comment # 1

A. Groups:

Group 2 aeroplanes are those that do not have an affected part installed. An A330 aeroplane on which Airbus modification (mod) 207217 has been embodied in production is a Group 2 aeroplane, provided the aeroplane remains in that configuration. An A330 aeroplane with both engines in pre-Rolls Royce (RR) Service Bulletin (SB) RB.211-73-AJ366 or pre-RR mod 73-AJ366 configuration is a Group 2 aeroplane, provided the aeroplane remains in that configuration.

1. The description of group 2 could be bit confusing, between production effectivity and in-service effectivity we believe it could be better to mark as “OR” condition.
2. An A330 aeroplane with both engines in pre-Rolls Royce (RR) Service Bulletin (SB) RB.211-73-AJ366 or **post-RR mod 73-AJ366 with Serviceable Part installed** is a Group 2 aeroplane, provided the aeroplane remains in that configuration.

B. Engine installation:

Engine installation:

(5) For Group 1 and Group 2 aeroplanes: From the effective date of this AD until 24 months after the effective date of this AD, it is allowed to install on any aeroplane a replacement engine, having an affected part installed, provided that, following installation, each affected part is replaced as required by paragraph (1) of this AD and that, pending that replacement, the requirements of EASA AD 2017-0041 are applied.

This paragraph would be conflicting with AOT A71L012-16 Rev. 02 para 4.1.1 which requires the removed part to be tagged as unserviceable and scrapped. Since there would be operators who has accomplished this AOT prior to release of this AD, might already tagged the affected part as

unserviceable and scrapped. We would appreciate for further clarification and possibility to return the affected part to service within the compliance time to suffice the Serviceable Part availability.

EASA response:

A. Comment not agreed. The commenter appears to be confusing pre-SB/mod with post-SB/mod configuration [see **marked text in Comment #1 above] of an engine (or both engines) on an aeroplane, which determines whether an affected part is installed. Pre-SB or pre-mod 73-AJ366 = no affected part installed (Group 2); whereas post-SB/mod 73-AJ366 = affected part installed (Group 1).**

The AD leaves at the discretion of the operator how to determine whether or not an affected part is installed, either by physical P/N inspection, or a records check, provided those records can be relied upon and accurately reflect the physical mod-status of an engine.

B. Comment not agreed. All removed parts shall be tagged as unserviceable and scrapped, as specified in the AOT. Both AOT and AD forbid any affected part removed from an aeroplane to return into service. However, §5 of the Final AD allows, for a limited period of time, to replace a non-affected engine (pre pre-Rolls Royce (RR) Service Bulletin (SB) RB.211-73-AJ366 or post Airbus Modification 2072017) with an engine which had not yet been retrofitted with a serviceable part. This action makes a Group 2 aeroplane (partially, or totally, if two engines are replaced) into a Group 1 aeroplane, where the post-SB/mod 73-AJ366 engine(s) then become(s) subject to the Group 1 requirement to replace the affected part.

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

Commenter 2: Jordan Aviation Airlines – Ahmad Al-Halaibeh – 23/12/2018

Comment # 2

Kindly be noted that our Trent 700 engine still pre-Rolls Royce (RR) Service Bulletin (SB) RB.211-73-AJ366, and I found the subjected PAD's required action for Group 2 aeroplane (pre SB 73-AJ366) is not clear.

So we would like to ask about the required action for Group 2 aeroplanes (pre SB 73-AJ366), is it to modify the engine with RR (SB) RB.211-73-AJ366 as required by EASA AD 2016-0120 paragraph 9 at next qualified shop visit and during the shop visit the serviceable part having P/N AE711121-22 (this PAD's required action) will be installed? Or is there something else required for pre (SB) RB.211-73-AJ366 engine (before the next shop visit's due date)?

EASA response:



Comment understood. For Group 2 aeroplanes, only paragraph (4.2) and (5) apply. Paragraph (4.2) prohibits installation of an affected part on an engine of the aeroplane. As for paragraph (5), it is a special allowance which gives the possibility to install an engine equipped with an affected part on a Group 2 aeroplane (engines not equipped with an affected part) for a certain period and under certain conditions.

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

Commenter 3: Cathay Pacific Airways Limited – Anthony Shum – 09/01/2019

Comment # 3

I would like to provide comments on the general applicability of the AD, the Credits given and the termination statement of the existing AD 2017-0041 C1:

- A. For the applicability and the general control of this EASA AD, could it be controlled against engines instead of aircraft level? This is because the hydraulic tube ripple damper is installed in engine level and an aircraft could be installed with different configuration between sister engines therefore it may be clearer if the control is in engine level. So for example, Group 1 is for the engines with affected part installed and Group 2 is for the engines with MOD 207217 embodied at production (2) pre RR SB 73-AJ366 and (3) post RR SB 73-AJ366 AND post SB 29-AJ942 [see also the next paragraph].
- B. In Group 2, it is suggested to add post RR SB 73-AJ366 AND post RR SB AJ972 configuration, this is because apart from production aircraft or engines, for service run engine currently undergo a qualified shop visit both the RR SB 73-AJ366 AND post RR SB 29-AJ972 will be incorporated so in this configuration the engine should be fallen under Group 2.
- C. Paragraph (3) Credits / Related AD, could the paragraph (2) be added for the credits. Also, could this be explicitly stated modified as required by paragraph (1) and (2) of this AD is compliant with the requirement of EASA AD 2017-0041 C1 and constitute a terminating action of EASA AD 2017-0041 C1.
- D. Ref Publications, paragraph 2 should be SB RB.211-29-AJ942 instead of 28-AJ942.

EASA response:

- A. Comment understood but not agreed. The affected part is indeed installed on an engine, however, this is certified as part of with the aeroplane type design, hence the AD at aeroplane level.**
- B. Comment not agreed. Groups are defined using the P/N of the affected part. See also answer to Comment #1 point A above.**



C. Comment not agreed. EASA consider that there is no need to specify that it is terminating action for EASA AD 2017-0041. When compliance with this AD is accomplished, hydraulic pressure tube assemblies having P/N AE711121-22 are installed. That P/N is not an “affected part” for EASA AD 2017-0041.

D. Comment agreed. SB number has been corrected in the Final AD.

No changes have been made to the Final AD in response to points A, B and C of this comment.

Commenter 4: Lufthansa Technik AG – Maximilian Pitzner – 09/01/2019

Comment # 4

A. With this PAD we would have expected that AD 2017-0041 gets superseded. Could you please explain why AD 2017-0041 does not get superseded?

B. “Ref. Publication” is showing the wrong ATA Code “RB.211-28-AJ942”. It should be 29 instead of 28.

EASA response:

A. Comment not agreed. It was decided not to supersede EASA AD 2017-0041, which would only be appropriate if the new AD had retained all its requirements. These must remain valid for an aeroplane until full compliance with this Final AD is demonstrated for that aeroplane. See also EASA answer to Comment #3 point C above.

B. Comment agreed. See EASA answer to Comment #3 point D above.

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

