

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-076

**[Published on 02 May 2019 and officially closed for comments on 16 May 2019]**

### **Commenter 1: Airbus – Marie Kuntzmann – 03/05/2019**

#### **Comment # 1**

A discrepancy has been identified between the P/N mentioned in the PAD 19-076 and in the VSB RB.211-73-K110.

P/N reference mentioned in the VSB are RRY22-0122-380A and RRY23-0123-380A, whereas in the PAD P/N reference mentioned in the VSB are RRY22-01-22-380A and RRY23-01-23-380A.

Can you please consider this comment in the final AD?

#### **EASA response:**

**Comment agreed. The Final AD has been amended accordingly.**

### **Commenter 2: Emirates – Mohammed Radaideh – 05/05/2019**

#### **Comment # 2**

Please note that the SB Rolls Royce Trent 900 RB211-73-K110 given in the PAD is covered by Airbys SB A380-73-8023 (Airbus Mod No. 77665T87086), therefore we would like to also see this Airbus SB given in the AD when issued.

#### **EASA response:**

**Comment partially agreed. The use of the Airbus SB is acceptable, but there is no need to make that explicit in the AD, since the Airbus SB refers for the accomplishment (SW upload) directly to the instructions of Rolls-Royce Trent 900 SB RB211-73-K110, which is the required-by-AD document.**

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



**Commenter 3: All Nippon Airways – Hiroyuki Tanizaki – 08/05/2019****Comment # 3**

Regarding to paragraph "SW Update", please put following sentence.

"After expiry of the compliance time, it is allowed to install an affected engine or EEC with affected SW on an aeroplane, before first operation of that engine, the engine or EEC is modified by updating the EEC SW in accordance with the instruction of the SB."

Similar sentence is described on Required Action(s) and Compliance Time(s) (2) EASA AD 2014-0192 dated 01 September 2014.

As a background, uploading EEC software can be completed by using aeroplane on-board loading function, therefore it is impossible to upload the serviceable EEC software for spare engine and shop visit engines. Please consider to add above sentences because there is no risk to upload the serviceable EEC software after engine installation and before first operation, even though after the compliance time.

**EASA response:**

***Comment agreed. The Final AD has been amended by inserting a new paragraph (2).***

