

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-085

[Published on 21 May 2019 and officially closed for comments on 04 June 2019]

### Commenter 1: British Airways – Olly Townley – 29/05/2019

#### Comment # 1

The proposed effective date of the new AD is expected to be 15th December 2019, this coincides with the compliance date of RR NMSB 72-AK313 which instructs operators to change service management of IPC Rotor Blades and Shafts from 72-AK060 to 72-AK313, on or before this date. However if PAD 19-085 is not effective until 15th December 2019, operators must remain compliant with the existing AD 2018-0084R2 (which mandates 72-AK060) until this date.

The current proposal will not allow operators to transition onto 72-AK313 until after 15th December, despite Rolls Royce recommending (per AK313) that operators should transition to the new inspection regime before 15th December.

Please can this be reviewed, and EASA consider releasing the AD earlier with a grace / transition period given between the Effective date of the AD and the recommended compliance date of the SB.

#### EASA response:

**Comment not agreed. The 15 December 2019 effective date was chosen, so that the time between AD issue date and that date represents the ‘transition period’ the commenter refers to. By the time the AD becomes effective, all engines should be within the new ‘regime’ of inspections by NMSB 72-AK313.**

**Since that NMSB (approved data) is published, the instructions thereof can already be accomplished. The PAD confirmed (§9) that “After the first inspection of an engine as required by this AD, the actions specified in EASA AD 2018-0084R2 are no longer required for that engine”.**

**In addition, any AD-required action is allowed to be voluntarily accomplished before the effective date of the Final AD. This AD is no exception to that principle.**

**Taken together, it means that the §(9) ‘terminating action’ is valid as soon as the AD is published and can be applied to stop the need to comply with AD 2018-0084R2.**

**No changes have been made to the revised PAD in response to this comment.**



**Commenter 2: All Nippon Airways – Hiroyuki Tanizaki – 04/06/2019****Comment # 2**

Regarding to Terminating Action, ANA would like to confirm EASA AD 2018-0084R2 can be superseded or not after the first inspection in accordance with RR NMSB TRENT 1000 72-AK313 before 15 December 2019 which is expected as effective date of this AD.

**EASA response:**

**Comment not agreed. Note that the AD states (end of Reason section) that “It is expected that, once all engines are in the new inspection regime, EASA AD 2018-0084R2 will be cancelled”.**

**When that time comes, EASA plans to issue a Proposed AD Cancellation Notice (PAD-CN) for public consultation, to obtain confirmation (e.g. by absence of comments) that all engines have transitioned to the new inspection regime. Once that is confirmed, a Final AD-CN will cancel that AD.**

**See also EASA answer to Comment #1 above.**

**No changes have been made to the revised PAD in response to this comment.**

