

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-207

[Published on 21 November 2019 and officially closed for comments on 19 December 2019]

Commenter 1: Aeroflot – Dmitriy Barzunov – 11/12/2019

Comment # 1

This AD will have a significant economic negative impact on the Airlines. OEM must offer acceptable compensation other than standard warranty. We ask for free materials and 100% labor compensation against EASA AD No.: 19-207.

EASA response:

Comment noted. Any financial consequences of AD related action(s) should be subject to discussion and agreement between the design approval holder and the aircraft owner/operator.

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

Commenter 2: IRAERO Regional Airlines – Yevgeniy Bychinskiy – 13/12/2019

Comment # 2

- A. According to Part(s) Installation, it is necessary to remove the engine for installation and replacement Fuel Nozzles P/N 365-144-303-0 and 365-144-503-0, why is it necessary if these Fuel Nozzles are available to replace without removing the engine?
- B. Is it allowed to replace Fuel Nozzles P/N 365-144-303-0 and 365-144-503-0 with operating life less than 7000 FH, on other engine without sending these Nozzles in Shop?
- C. For performing this Directive, Fuel Nozzles P/N 365-144-303-0 and 365-144-503-0 must be afforded to the operators for free or with discounting, because the price for these Fuel Nozzles is too big and there is risk that operators wouldn't have possibility to buy it within a short time after Directive will be established.

D. Since the price of Fuel Nozzles is quite big and the deadline of performing this Directive, after it will be established (for engines with operating life more than 7000 FH), is not long enough (only 300 FH), we ask to extend the time interval for performing the Directive for engines with operating life more than 7000 FH.

EASA response:

- A. Comment agreed. The Final AD wording has been amended to delete 'remove the engine from service'. Fuel nozzle replacement in accordance with the instructions of the SB includes both on-wing and in-shop instructions.**
- B. Comment noted. As defined in the AD, a part which has not exceeded 7000 FH is considered serviceable and can therefore be installed on another engine without sending these nozzles in shop (provided of course they are not subject to any other finding or condition). However, they will still have to be removed from service and replaced before exceeding 7000 FH.**
- C. Comment noted. See EASA answer to Comment # 1 above.**
- D. The 300 FH allowance has been established to provide sufficient time to allow for part procurement and installation planning. Because the embodiment of this SB is required within 7000 FH (time accumulated by the part) to ensure safe operation of the engine, EASA do not intend to extend the compliance time beyond the 300 FH allowance. However, if properly substantiated (see our [AD FAQ](#)), an application for a temporary exemption can be submitted to the competent authority for its consideration.**

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

