

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-008

[Published on 22 January 2020 and officially closed for comments on 11 February 2020]

### Commenter 1: Flydubai – Ron Rillera – 12/02/2020

#### Comment # 1

Dear EASA,

Hope this message finds you well.

Flydubai have reviewed the PAD No. 20-008 and have some comments or items for clarification.

/A/ The Engine Shop Manual is traditionally an off-wing maintenance publication. We are concerned that the direction of including mandatory on-wing tasks in the ESM may lead to a non-conformance. Example below;

- a. ESM Chapter 05-29-00 was issued January 9<sup>th</sup> 2020, banning LEAP-1B operation with the software installed is version 6.52 or lower
- b. Flydubai does not have visibility on when then the ESM Revisions are issued, or there is lack of method to notify operators that there is an incoming mandatory inspection requirement to be published in the ESM
- c. At the time of 05-29-00 publication, the CFM Service Bulletin still allows 50FC of operating an engine with an older software
- d. If the operator have not noticed the ESM revision, and relied on the SB the aircraft would have been operated in a non-conforming way to the ALS
- e. Similarly, if the AD for PAD 20-008 is issued, there will be a conflict of compliance period
- f. Since ESM Chapter 05 is also mandatory, operators cannot fly the aircraft using the AD relief of 3FC (1 sector)

/B/ The airframer MPD, which is the main source document of an AMP, is designed for “aircraft level” maintenance per our discussion with Boeing. Below excerpt from Boeing;

*“It is also to be noted that the MPD is designed at aircraft level. Boeing does not provide maintenance interval resetting at component/module level after shop visit.”*

Another excerpt from Boeing 737-7/8/8200/9/10 MPD Notes: ATA 71-80 (Powerplant)



*4. There are no mandatory Threshold Inspections required. Engine manufacturers may recommend such inspections in the event that in-service experience would dictate the need to examine specific components of individual engines; if this is required, direct negotiations between applicable operators and the engine manufacturers will be necessary. Results of these inspections should be made available by the engine manufacturers to other customer airlines as well as the regulatory authorities.*

/C/ Can you please clarify the statement below; is the intention of the AD is for operators just to add the tasks and the AMP and not to control the individual tasks individually

Furthermore, we feel that incorporating the ESM tasks in the AMP is unnecessary when;

- a. There are other covering documents such as the AMM, FIM and Service Bulletins issued by the OEMs to control the requirements as part of ICA
- b. Likewise, based on our experience with CFM, the MROs are not willing to sign off AMP tasks or provide record of compliance
- c. Since PAD 20-008 has a multiple required actions, with difference intervals in the ALS, LLP limits, we find it very difficult and complex to show compliance on this AD

#### **Recording AD Compliance:**

(6) When the AMP of an aeroplane has been revised as required by paragraph (4) or (5) of this AD, as applicable, that action ensures continued accomplishment of the tasks as required by paragraphs (2) and (3) of this AD for that aeroplane. **Consequently, after revising the AMP, as required by paragraph (4) or (5) of this AD, as applicable, it is not necessary that accomplishment of individual action is recorded for demonstration of AD compliance on a continued basis.**

/D/ Appreciate if EASA can provide clarity on why there is a change of direction on how the mandatory maintenance are controlled

- a. A single AD is usually issued to address a specific issue, with a covering SB and operators are used to this method. Most of the maintenance systems and processes used by operators and MROs are designed for such
- b. Was there a Risk Analysis performed for the management of change in process

PAD discussion is still on-going internally and with CFM, may add further comments

#### **EASA response:**

**/A/ Comment not agreed: The ALS of Ch. 5 of the engine manual (for the CFM LEAP the Engine Shop Manual) is prescribed for mandatory maintenance task and component lives in any form. An aircraft must be operated in compliance with the requirements of the engine ALS. EASA has**



*been issuing AD to mandate the content of the ALS since at least 2006. You may find additional information in the dedicated FAQ in the EASA website ([link](#)). Presentations have also been provided to operators during AD workshops, and are available in the EASA website ([link](#)). Additional information on “mandatory SB” are also available in the EASA website, at [this link](#).*

*It has to be noted that in case of inconsistency between the requirements of an AD, and the information provided in the referenced TCH publication, the AD requirements prevail.*

*Regarding Flydubai not having visibility on when the ESM Revisions are issued, this is a matter for Flydubai to take up with CFM International, or their supplier, as applicable. The EASA PAD was issued also to provide advance notification of the (planned) AD to operators.*

*/B/ Comment noted: as properly stated, the airframer MPD is one source for the AMP. Other requirements, such as the engine ALS tasks and limitations, must also be part of the approved AMP. The ALS (Chapter 05) of the engine manual is specifically intended for mandatory inspection requirements by design. It is noted that the commenter is referring to powerplant (ATA 71) rather than engine (ATA 72).*

*/C/ As clarified in the definition of AMP, for engines installed on aeroplanes operated under EU regulations, compliance with the approved AMP is required by Commission Regulation (EU) 1321/2014. Consequently, once the AMP has been updated, compliance with each required task is expected to be logged as compliance with the AMP; logging that same task as compliance with AD is considered to be an unnecessary burden for operators and is no longer required.*

*/3a/ Noted. It is operator responsibility to arrange all the applicable requirements into an AMP and, thereafter, maintain the aeroplane accordingly. Ref. Commission Regulation (EU) 1321/2014, M.A.302*

*/3b/ Noted. This is a matter for Flydubai, their individual MROs and the competent Authority*

*/3c/ See above. Once the AMP is updated, as required by the AD, there is no need to log any single task as compliance with AD requirement, as indicated in the section (6) of the AD.*

*/D/ Comment not agreed. There has been no change of direction or process regarding AD issuance for ALS changes. See also EASA answer to Point A above and refer to the presentation given during the 4th AD workshop ([link](#)). It should be noted that the aircraft on which these engines are installed are not currently in operational service, for this reason these required actions have been directly incorporated into the engine ALS and made mandatory via AD rather than a series of individual SBs and ADs.*

*No changes have been made to the Final AD in response to these comments*

