

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-038

[Published on 18 February 2020 and officially closed for comments on 17 March 2020]

Commenter 1: Hong Kong Airlines – Robin Zheng – 24/02/2020

Comment # 1

We have 3 queries on this PAD:

- A. Refer to captioned PAD, for given engine model TrentXWB-84, we suppose EASA has intention to mandate the airworthiness limitations instructions in below two TLM tasks for operators to comply with, is it correct?
TRENTXWB-A-05-10-01-00A01-030A-D Airworthiness limitations (Mandatory parts lives)
TRENTXWB-A-05-20-01-00A01-030A-D Airworthiness limitations (Mandatory inspections)
- B. As we also see section 30 of TLM is for “recommended lives”, it appears it is not airworthiness limitation. Please confirm, if this section will also become mandatory by this coming AD?
- C. For task TRENTXWB-A-05-10-02-00A01-030A-D Time limited dispatch, we believe RR should have pass the dispatch limits to Airbus for MMEL development at type certification, existing MMEL includes all engine related No-GO/GO/GO-If instructions, does EASA have intention to include this task by this coming AD also?

We appreciate that EASA can further specify the AD required actions at final AD release.

EASA response:

- A. **Comment agreed. Only certain Airworthiness Limitations Sections of the TLM are mandated by this AD. The Final AD has been amended accordingly for clarification.**
- B. **Comment agreed. See EASA answer to Point A. above.**
- C. **Comment agreed. See EASA answer to Point A. above.**

Commenter 2: Cathay Pacific – David Li – 27/02/2020



Comment # 2

For the AD requirement that reference to the update in R/R TLM TRENTXWB-K0680-TIME0-01 document (Rev: 1 Nov, 2019). Appreciate the AD document can be more precise on the actual AD requirement, is it only referring to the update of the Environment Protection in the R/R TLM manual (Rev: 1 Nov, 2019) or else.

EASA response:

Comment agreed. See EASA answer to Comment # 1, Point A., above.

Commenter 3: Air France – Loïc Bourdais – 28/02/2020
Comment # 3

Mandatory Inspections and Replacement of Life Limited Parts:

The TLM is composed of various chapters and this PAD is only applicable to TLM 05-10-01 for Paragraph (1.1) and TLM 05-20-01 for Paragraph (1.2). Would it be possible to clearly state that only TLM 05-10-01 and TLM 05-20-01 are concerned by the purpose of this AD?

EASA response:

Comment agreed. See EASA answer to Comment # 1, Point A., above.

Commenter 4: Hong Kong Airlines – Robin Zheng – 11/03/2020
Comment # 4

We also would like to highlight that in TLM TRENTXWB-A-05-20-01-00A01-030A-D Mandatory inspections, some inspections are with specific threshold/interval, but some not:

Mandatory inspections without specific threshold/interval (in FC/FH):

- Step 1.1.6 piece part level inspection,



- Step 2.2. mandatory inspection post disassembly
- Step 2.3. mandatory inspection during assembly
- Step 2.4.8 mandatory at L3 or above workscope of HP system module

Mandatory inspections with specific threshold/interval (in FC/FH):

- Step 2.1.2 List of mandatory inspection intervals
- Step 2.4.1- 2.4.7 mandatory inspection -non-critical parts

For PAD required action 1.2, “within the threshold and intervals” and PAD action (3), do EASA agree that the applicable mandatory inspections are those inspections with specific threshold/interval in FC/FH only?

EASA response:

Comment not agreed: For the steps listed in the comment, the threshold for a mandatory inspection/task is “when the component has been completely disassembled to piece-part level”, or “post disassembly”, or “during assembly”, or “Level 3 workscope”, as defined in the TLM.

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

Commenter 5: Lufthansa Technik – Rene Schinkel – 13/03/2020

Comment # 5

- SB 72-K440 must be complied with until 31st December 2022 for -97 engines iaw section 05-10-01. SB is not yet issued, how can operators plan for maintenance accordingly?
- Please detail in final AD that section 05-00 and 05-30 are not affected by this PAD/AD.
- Please detail if time-limited dispatch requirements from TLM are also affected by this AD. Please exclude as this is usually not handled by AMP.

EASA response:

A. Comment agreed. See EASA answer to Comment # 1, Point A., above.

B. Comment agreed. See EASA answer to Comment # 1, Point A., above.

C. Comment agreed. See EASA answer to Comment # 1, Point A., above.

