

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-100R1

[Published on 19 October 2020 and officially closed for comments on 02 November 2020]

Commenter 1: All Nippon Airways – Tetsuji Konohira – 24/10/2020

Comment # 1

Regarding EASA PAD 20-100R1, Page 3 of 4, Paragraph (3) stating "in accordance with applicable CFMI instructions" is not a clear definition.

Please consider to modify the sentence to "in accordance with the instructions of the applicable S/B".

EASA response:

Comment not agreed. The definition of applicable S/B is limited to 3 S/B; anyway other S/B issued by CFMI (and listed in the “Part Progression Chart” of the applicable S/B) may have to be applied, depending on engine configuration. No changes have been made to the Final AD in response to this comment.

Commenter 2: United Airlines – Irene Ibrahim – 30/10/2020

Comment # 2

Regarding EASA PAD 20-100R1, Page 3 of 4, Paragraph (2) stating the Required Action(s) and Compliance Time(s) "For Group 1 CFM56-7B engines: Not later than during the first qualifying engine shop-visit beginning after 22 October 2012 [the effective date of EASA AD 2012-0209], and in any case not later than 31 December 2024, replace each affected AGB with a serviceable AGB in accordance with the instructions of the applicable S/B." :

United Airlines agrees that, additional to existing EASA AD 2012-0209 (FAA AD 2013-26-01), further mitigation action is needed to eliminate the possibility of dual-engine exposure to oil loss events due to incorrectly installed or uninstalled Hand Cranking Pad Cover. Based on CFMI's data of a single Air Turnback event due to engine oil loss across all Operators (which CFMI shared had happened in March 2019), the residual risk for engines that have yet to have qualifying shop visit is effective only for dual-engine exposure where both engines are pre-AD gearbox configuration on the same aircraft. Since the effective date of EASA AD 2012-0209 (FAA AD 2013-26-01), a population of engines have already accomplished mandated Accessory



Gearbox re-work at qualifying engine shop visits and the Hand Cranking Pad cover inspection is a mandated Required Inspection Item after any routine or non-routine maintenance work.

United Airlines recommends to limit the scope of the new mandate PAD 20-100R1 such that it prohibits aircraft configurations with dual-engines being pre-AD 2012-0209 (FAA AD 2013-26-01) with compliance not later than set deadline of 31 December 2024.

EASA response:

Comment not agreed. See also EASA answers provide in the CRD to PAD 20-100. No changes have been made to the Final AD in response to this comment.

