

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-149

[Published on 29 September 2020 and officially closed for comments on 27 October 2020]

Commenter 1: Singapore Aero Engine Services – Abdul Malek Bin Abdul Aziz – 16/10/2020

Comment # 1

- A. If a post J941 standard engine comes in for a shop visit, how does the shop declare the module to AK430? There is an option for it to be re-declared to AK430 on-wing (as per AK430 accomplishment instructions but it is not an option for in-shop accomplishment. Does this mean the module needs to be disassembled?
- B. Module Serviceability is classified as a qualified Shop visit. However, the module will not be disassembled if it is in shop for a module serviceability Workscope.

EASA response:

A. Comment noted. For an engine modified to post-SB/mod 72-J941 standard before the effective date of the AD, it is considered that paragraph (9) of the AD is complied with and declaration to 72-AK430 should normally be done – based on the credit given in the AD – while the engine is still on-wing, prior to coming into shop.

For engines in pre-SB/mod 72-J941 standard: SB 72-J941 must be incorporated concurrently with SB 72-AK430 in shop, leading to post SB 72-AK430 and post-SB 72-J941 declaration.

The SB 72-J941 concurrent requirement has been added to the Final AD for clarification.

B. Comment noted. Since “M32-IPC Module rework level of Module Serviceability” is defined as a ‘qualified shop visit’ for the purpose of this AD, the engine must be modified, as required by the AD, during that shop visit, provided the engine does not pass into another ‘qualified shop visit’ (as defined in the AD) before.

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



Commenter 2: All Nippon Airways – Hiroyuki Tanizaki – 27/10/2020**Comment # 2**

- A. Could EASA consider adding "except those that have Rolls-Royce modification (mod) 72-J941 embodied" in applicability similar to EASA AD 2019-0248/0250 for clarification?
- B. Could EASA consider removing the NMSB revision number for NMSB TRENT 1000 72-AJ814, 72-AJ819 and 72-AK092 in definitions similar to SB TRENT 1000 72-AK430 as the modification SB? NMSB TRENT 1000 72-AJ814, 72-AJ819 and 72-AK092 provide inspection instructions therefore ANA would like to use the later approved revision of above SB without any AMOC.

EASA response:

- A. Comment agreed. The Final AD has been amended accordingly, reducing the Applicability and removing paragraph (12) – as it appeared in PAD 20-149.**
- B. Comment agreed. The Final AD has been amended accordingly, also removing paragraph (10) – as it appeared in PAD 20-149. Credit for those previous revisions does not need to be explicit anymore.**

