

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-151

[Published on 30 September 2020 and officially closed for comments on 28 October 2020]

### Commenter 1: All Nippon Airways – Yuji Kurono – 28/10/2020

#### Comment # 1

- A. Rolls-Royce mentions that "Trent1000 Time Limits Manual (TLM), T-Trent-10RRB/ T-Trent-10RRC/T-Trent-10RRT ,Chapters 05-10 and 05-20" will be revised to increase the life limit of some parts which are not related with new and/or more restrictive tasks. ANA would like to specify the following sentence to be able to consider that the later approved revisions are acceptable for compliance with the requirements of this AD.
- "The use of later approved revisions of TLM is acceptable for compliance with the requirements of this AD." on "Definitions - the TLM"
  - "The use of later approved revisions of TLM can be considered as New and/or more restrictive tasks" on "Definitions - New and/or more restrictive tasks"
- B. Regarding to Trent 1000 Time Limits Manual (TLM) T-Trent-10RRT, Chapters 05-10, two methods which are Engine Flight Cycle (EFC) and Direct Accumulation Count (DAC) method are available to calculate and monitor the life of Critical Parts. If operator use EFC to calculate and monitor the life of Critical Parts, please confirm operator do not required to comply (1.3) on Required Action(s) and Compliance Time(s): (1) as shown below?

#### Required Action(s) and Compliance Time(s):

Required as indicated, unless accomplished previously:

#### Maintenance Tasks and Replacement of Critical Parts:

- (1) From the effective date of this AD, accomplish the following actions, as specified in the TLM, as applicable to engine model and depending on engine configuration:

(1.1) Replace each component before exceeding the applicable life limit.

(1.2) Within the thresholds and intervals, accomplish all applicable maintenance tasks.

(1.3) Ensure that DAC tables shown in the DAC life-usage calculator (LUC) tool match the applicable DAC Data Files as specified in the TLM.

***EASA response:***

***A. Comment not agreed. EASA considers that the content of an EASA AD must be taken in its entirety, i.e. not only the "Definitions" and "Required Action(s) and Compliance Time(s)" sections of that AD. Since the section "Ref. Publication(s)" already clearly indicates the documents for which a later approved revision can be used for compliance, at this time, EASA see no need to repeat that statement elsewhere in the AD.***

***B. Comment agreed. The Final AD has been amended accordingly.***

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

