

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-161

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**Commenter 1: All Nippon Airways – Toshinobu Hagiwara – 09/11/2020**

### **Comment # 1**

Regarding "Required Actions and Compliance Time , Modification (1)" in EASA PAD 20-161, could you please consider to change "Before **an affected engine mount** accumulates 9 400 flight cycles (FC) since first installation..."

to "Before **an affected part** accumulates 9 400 flight cycles (FC) since first installation..."

Since it is the "affected part" that can cause problems, it seems appropriate to manage the "affected part" directly with the accumulated FC.

Since the "affected part" belongs to the "affected engine mount", and even if we manage the accumulated FC with the "affected engine mount", there is possibility that the "affected part" is replaced, it means that the "affected part" is not managed.

If EASA agrees with our comment, please reflect it in the AD.

### **EASA response:**

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