

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-032

[Published on 25 February 2021 and officially closed for comments on 25 March 2021]

Commenter 1: Cathay Pacific Airways Limited – Derek Fu – 05 March 2021

Comment # 1

Paragraph 1 of the PAD states, “During a qualified shop visit, not later than 40 months after the effective date of this AD, inspect the affected part in accordance with the instructions of the NMSB.”

- A. Please can you clarify whether any previous accomplishment of NMSB72-AG774 with any revision (such as 01, or 03) is acceptable as AD compliance? If yes, please could EASA amend paragraph 1 accordingly and include the credit note at paragraph 4?
- B. If only NMSB72-AG774 revision 04 or later revision is acceptable, will EASA consider removing the 40 months requirement? Since Revision 04 was published in Oct 2020, this will mean most of the fleet would not have revision 04 embodied, and will need to be inducted for shop visit within 40 months. This will mean hard lifing most of the engines, especially when most aircraft are under prolonged parking due to COVID-19.

EASA response:

- A. Comment agreed. The Final AD has been amended by inserting a new paragraph (4), giving credit for past corrosion inspection(s) and corrective action(s) per NMSB 72-AG774, original issue up to Rev.3 inclusive, as well as those per NMSB 72-AJ032.**
- B. Comment not agreed. For an engine currently not in-service (aircraft parked or stored), no action is required by any AD until (just before) return to service of that engine. If, at the time of return to service, AD compliance time has expired, the AD must be complied with before return to service.**

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



Commenter 2: American Airlines – Heather Little – 18 March 2021**Comment # 2**

- A. From the statement “Qualified Shop Visit: Any scheduled shop visit where the affected part is exposed and substantial rebuild has not yet started, except shop visits for serviceability only.” AAL requests to remove the word “scheduled”, as we are unclear of the definition of scheduled.
- B. From the statement “Applicability: RB211 Trent 875-17, 877-17, 884-17, 884B-17, 892-17, 892B-17 and 895-17 engines, all serial numbers, except those that have been modified in accordance with the instructions of Part 1 of Rolls-Royce Service Bulletin (SB) RB.211-72-G581”, AAL requests to remove the words “Part 1 of”, as SB 72-G581 does not appear to be broken up into Parts.
- C. The current, as written definition of the NMSB specifies the required revision level, Revision 4; AAL requests to allow credit for engines worked to previous revisions of NMSB 72-AG774, including the original issue, Revision 1, Revision 2 and Revision 3.

EASA response:

- A. Comment noted. The word ‘scheduled’ means that the shop visit is planned in advance and recorded as such in the maintenance program, as opposed to any ‘unscheduled’ (i.e. unexpected, unplanned) shop visits, e.g. prompted by service difficulties. The consequence of using this word is that during any unscheduled shop visit, even if “the affected part is exposed and substantial rebuild has not yet started”, the AD does not need to be complied with during that shop visit.**
- B. Comment not agreed. Section D.(3) of the SB states that “This Service Bulletin is in two parts as follows”, where Part 1 is for “New production and in-service application” and Part 2 is indicated to be “Reserved for possible future use”.**
- C. Comment agreed. See EASA answer to Comment #1 Point A. above.**

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

