

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-062

**[Published on 30 April 2021 and officially closed for comments on 14 May 2021]**

**Commenter 1: Singapore Aero Engine Services Pte Ltd (SAESL) – Abdul Malek Bin Abdul Aziz – 05/05/2021**

### Comment # 1

We have a query on the subject PAD. Para 4 on Modification prohibition mentions that modification in accordance with SB 73-J441 is prohibited on Group 2 engines. We understand that group 2 engines are of 73-G165 mod standard. However, there will be chances where group 2 engines requires to be modified to 73-AK278 standard. In order to achieve 73-AK278 standard, the engine has to be modified to 73-J441 first before it can finally achieve 73-AK278 modification. Is this instance acceptable as per the AD? Can the term “do not modify” in para 4 change to “do not install the affected part” instead?

### EASA response:

**Comment agreed. PAD 21-062 has been revised and re-published (R1) to address this eventuality.**

**Commenter 2: Lufthansa Technik AG – Rene Schinkel – 05/05/2021**

### Comment # 2

please find below our feedback regarding your PAD 21-062:

- A. Due to parts obsolescence it may be required to rework engines from 73-G165 standard (Group 2 engines) to 73-AK278 standard (Group 3 engines). To accomplish this it is required to fit both 73-J441 and 73-AK278, please refer to concurrent requirement section of SB 73-AK278. Please change to wording to allow embodiment of SB 73-J441 only in conjunction with SB 73-AK278.
- B. Reference to SB 73-K255 is technically missing in the proposed AD. However it is required to remove all moisture from the lines before fitting 73-AK278 to avoid further engine control issues after 73-AK278.



***EASA response:***

***A. Comment agreed. See EASA answer to Comment #1 above.***

***B. Comment not agreed. The action of NMSB RB.211-73-K255 is recommended only and is not related to the unsafe condition addressed by this AD, hence it is not specified in SB RB.211-73-AK278 R1 (nor in the original SB). Similarly, the repetitive maintenance actions of NMSB RB.211-73-G078 remain recommended as well.***

***No changes have been made to PAD 21-062R1 in response to point B. of this comment.***

