

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-087

[Published on 16 June 2021 and officially closed for comments on 14 July 2021]

Commenter 1: Lufthansa Technik AG – Rene Schinkel – 21/06/2021

Comment # 1

- A. (1) requires to “remove each affected part from the engine” all affected parts. For our understanding this requires a shop visit to remove those parts from an affected ESN in a very close timeframe. As long as the engine is not in service (e.g. removed from aircraft and stored in the hangar), we do not see why there is a requirement to remove those parts from the engine. We ask EASA to re-word from “remove from engine” to “remove from service”, as EASA uses in many similar AD cases.
- B. In Ref. Publications you refer to “Task 05-20-01-800-801 (Mandatory Inspections and Declared Safe Cyclic Lives)”. The relevant tasks from time limits manual are named “Task 05-10-01-800-801 Airworthiness Limitations (Critical Group A Parts Lives)” and “Task 05-20-01-800-801 Airworthiness Limitations (Mandatory Inspections)”. Therefore the mandatory inspections can be found in 05-20... and the DSCL in 05-10...
For our understanding task 05-20... does not contain any relevant information regarding removal from service of parts in accordance with this AD. Please change to task 05-10... or shortly explain in AD why this task is affected.

EASA response:

- A. Comment not agreed. In principle, an AD does not require any action on an engine which “is not in service (e.g. removed from aircraft and stored in the hangar)”, as the commenter refers to. For an engine currently not in service, AD compliance, when due or overdue, would be required (just) before release to service of that engine.**
- B. Comment agreed. The references have been amended in the Final AD accordingly.**
- No changes have been made to the Final AD in response to point A of this comment.**



Commenter 2: Qantas Airways Limited – Bruce Russell – 05/07/2021**Comment # 2**

- A. The intentions of the proposed AD are clear, with one error noticed within the Ref. Publications section which states Task 05-20-01-800-801.
- B. Operators are required to comply with the Rolls-Royce Trent 900 Time Limits manual (TLM) by the Type Certificate Holder Airworthiness Authority. The A380 MPD ALS also applies tasks to group A life limited parts. EASA AD 2018-0048 mandates compliance to the Rolls-Royce Trent 900 Time Limits manual (TLM). The recent revision 1 of AD 2018-0048 specifically included chapter 05-10, which is the chapter affected by this PAD. EASA AMOC 10067411 was previously issued where an alternative method was used to those specified within the TLM, highlighting the need to comply with any detail stated within the TLM. The new “notes for restricted components” added to the TLM chapter 05-10 are clear in their intentions and will be implemented by the operators. The purpose stated in the PAD replicates what the mandated TLM revision has already accomplished. Can an explanation be provided to why an additional AD is required to enforce the TLM revision?

EASA response:

A. Comment agreed. See EASA answer to Comment #1 point B above.

B. Comment not agreed. This AD is not issued to enforce the latest TLM revision in full, only to remove those parts from service for which a ‘zero’ life has been established.

It should be clear that [EASA AD 2018-0048](#) (now at R1) allows the use of “later approved revisions” of the TLM specified (dated 01 September 2017) in the AD, but does not require the implementation of ‘the latest’ TLM revision.

In addition, although it is true that for engines operated under EU regulation, operators are required to comply with airworthiness limitations (in case of Rolls-Royce engines, certain TLM chapters) by amending the maintenance programme on a regular basis. This is not a world-wide requirement, however, which is why the Agency established a policy – largely harmonised with FAA, ANAC Brazil and Transport Canada – to issue an AD to require compliance with an ALS (TLM) revision whenever such a revision introduces a new or more restrictive task.

See our related [AD FAQ](#). Without issuing an AD there may be a lack of awareness of ALS (TLM) changes and implementation may not be enforced on all engines.

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

