

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-145R1

[Published on 27 October 2021 and officially closed for comments on 10 November 2021]

Commenter 1: Singapore Airlines Ltd – Ryan Leung – 01/11/2021

Comment # 1

Singapore Airlines have stored some A380s away from main base and they will only return to the main base (via non-revenue flight – 2 legs) some time in 2023/2024 (after the AD due date).

As these aircraft are in long-term storage, we would like to seek some flexibility to perform the modification (after the AD due date) when the aircraft returns to the main base after periods of long-term storage away from main base or before the next flight.

EASA response:

Comment acknowledged. Requirements apply upon release to service, thus actions can anyhow be delayed until then.

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

Commenter 2: All Nippon Airways Co., Ltd. (ANA) – Takuma Koga – 09/11/2021

Comment # 2

- A. ANA requests to supersede existing EASA AD 2019-0113 issued 24 May 2019, from the point which it instructs the installation of the affected SW of this AD.
- B. In paragraph "Modification", it is required to install serviceable SW within 12 months after the effective date of this AD. Where there may be spare engines/EECs which will not be used (installed on an aircraft and operated) within this period, could EASA consider adding the following sentence?

"After expiry of the compliance time of this AD, it is allowed to install an engine or EEC with affected SW on an aeroplane, provided that, before first operation of that engine, the engine or EEC, as applicable, is modified by installing serviceable SW, as defined in this AD, in accordance with the instructions of the SB."



Similar instruction appears in the existing EASA AD 2019-0113 issued 24 May 2019.

- C. In paragraph "Modification", it instructs to install serviceable SW on the aeroplane or to replace the EEC unit on the aeroplane which contains serviceable SW, in accordance with the instructions of the SB. However, accomplishment instructions in the SB only contains the procedure to install serviceable SW on the aeroplane. From this point, the phrase "in accordance with the instructions of the SB" should be moved per the following.

"For Groups 1 aeroplanes: Within 12 months after the effective date of this AD, install serviceable SW on the aeroplane in accordance with the instructions of the SB, or replace each EEC unit on the aeroplane with an EEC unit that contains serviceable SW."

- D. In the "Definitions" section, the affected SW and the serviceable SW is referred as "FADEC standard" 12.3 and 12.4. Where this wording "FADEC standard" does not appear in the SB, could EASA consider defining the SW such as "EEC standard" 12.3 and 12.4 to avoid any confusion?

EASA response:

- A. Comment partially agreed. AD 2019-0113 is an engine level AD requiring installation of SW version 12.3, applicable to all RB211 Trent 970-84, 972-84 and 972E-84 engines. A statement was added in the Final AD to clarify.**
- B. Comment agreed. The Final AD has been amended accordingly.**
- C. Comment agreed. The Final AD has been amended accordingly.**
- D. Comment agreed. The Final AD has been amended accordingly.**

