

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-012

[Published on 15 February 2022 and officially closed for comments on 15 March 2022]

### Commenter 1: SunExpress Airlines – Oğuz Karayavuz – 16/02/2022

#### Comment # 1

There are two main instruction sections in EASA AD 2020-0055. First one is for “EEC Software modification” and second one is for “Maintenance Tasks and Replacement of Life Limited Parts”. EEC Software modification has already been completed in our fleet. For “Maintenance Tasks and Replacement of Life Limited Parts”; we perform and will be performing all of maintenance tasks in accordance with Aircraft Maintenance Manual and Engine Shop Manual. For Life Limited Parts, we follow up LLPs with a life limited part report.

Now, the upcoming AD of PAD No: 22-012 is including the same phrase of “Maintenance Tasks and Replacement of Life Limited Parts”.

We kindly request from EASA to simply describe what is being expected from operators with this section ? How/by which means can the operator include all CFM LEAP-1B ESM SM.21, Chapter 05 into AMP ?

Also could you please explain the given credit in this AD:

“Consequently, after revising the AMP, as required by paragraph (3) or (4) of this AD, it is not necessary that accomplishment of individual action is recorded for demonstration of AD compliance on a continued basis.”

#### **Maintenance Tasks and Replacement of Life Limited Parts:**

(2) From the effective date of this AD, accomplish the following actions, as specified in the ALS, as applicable to engine model and depending on engine configuration.

(2.1) Replace each component before exceeding the applicable life limit; and

(2.2) Within the thresholds and intervals, accomplish all applicable maintenance tasks.

Regarding the “Maintenance Tasks and Replacement of Life Limited Parts” section of AD; Life Limited Parts are followed up with Life Limited Parts Summary Report by operator. Mandatory inspections are all included in Engine Shop Manual/Aircraft Maintenance Manual in applicable chapters and tasks. All required tasks are performed in disassembly level with applicable maintenance manual. Control System Time Limited Dispatch limitations ensure that the engine is not operated with the system faults for longer than the time permitted. Requirement is tracked by deferred or hold item in accordance with applicable Aircraft Maintenance Manual by operators. If required, time limited dispatches are done by applicable Aircraft Maintenance



Manual or Minimum Equipment List. We, therefore, believe CFM LEAP-1B ESM SM.21, Chapter 05 is already performed with given Maintenance Manuals.

Please explain how/by which means can the operator demonstrate this section of AD ? If it is not necessary to demonstrate this AD section; is it enough to include a wording in AMP with the above details?

Because the upcoming AD also includes this chapter, we ask for a clarification of demonstration of AD, and the intention of EASA with “revising AMP” for ALS chapter of ESM.

**EASA response:**

**Comment noted.**

***In the EU system, according to Regulation (EU) 1321/2014 Annex I (“Part M”), Paragraph M.A.302(a), “Maintenance of each aircraft shall be organised in accordance with an AMP”. Paragraph M.A.302(d) states that the AMP shall demonstrate compliance with (among others) the ICA issued by the holders of the type certificate [...].***

***Based on the above, paragraph (3) of this AD is actually identifying a compliance time to accomplish an action which is required by other regulation (i.e., revising the AMP to keep the AMP consistent with the ALS content).***

***It is recommended that operators seek advice from their competent NAA to agree a method to show compliance with this AD and about the content of the AMP.***

***See also the dedicated FAQ on EASA website (<https://www.easa.europa.eu/faq/23797>).***

***Regarding paragraph (5) of the AD: an applicable ALS maintenance task (e.g., a LLP replacement) accomplished before the AMP update is expected to be recorded as compliance with paragraph (1) of the AD; once the AMP is updated, the same action does not need anymore to be recorded as compliance with the AD.***

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

