

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-155

[Published on 17 November 2022 and officially closed for comments on 15 December 2022]

Commenter 1: All Nippon Airways (ANA) – Yotaro Morioka – 22/11/2022

Comment # 1

Definitions of "engine shop visit" - Is "engine shop visit" including serviceability shop visit? The "Required Action(s) and Compliance Times(s), Replacement, (1) In-shop" section of the PAD 22-155 instructs to replace some affected parts during the next engine shop visit. ANA would like to confirm if the engine shop visit includes serviceability shop visit. Also ANA would like to request to add definition of "engine shop visit" on the PAD 22-155 for clarification.

EASA response:

Comment not agreed. Unless specified otherwise in an AD, all engine shop visits are those as defined in Section 8.3 of Rolls-Royce Generic EMP Document RM1853. This does not include 'serviceability' visits, which are defined as NOT being engine shop visits in that document – see Section 5.3. No changes have been made to the Final AD in response to this comment.

Commenter 2: Lufthansa Technik AG – Rene Schinkel – 24/11/2022

Comment # 2

Please clearly state the "qualified shop visit" definition for in-shop replacement. It would be the best when referring to the Generic EMP Document RM1853, e.g. similar to EAD 2019-0230 and 2014-0152R1.

EASA response:

Comment not agreed. See EASA answer to Comment #1 above. No changes have been made to the Final AD in response to this comment.

