

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-057

**[Published on 17 May 2023 and officially closed for comments on 31 May 2023]**

### **Commenter 1: All Nippon Airways Co., Ltd – Takayuki Ishii – 29/05/2023**

#### **Comment # 1**

In terms of Maintenance Tasks and Replacement of Critical Parts: paragraph (1.4), the TLM and the relevant AMM task B787-A-R70-01-10-00A-030A-A instruct two procedures to monitor the flight profiles. If we use DAC, we must follow the first procedure in the AMM, and DAC LUC tool is an interface to find any engine speed exceedances.

In our understanding, “Ensure flight profile monitoring is conducted using take-off and en-route speed limits as specified in the TLM” is a part of the second procedure in the AMM, which is for Non-DAC.

Does the EASA require the action of paragraph (1.4) for the operators who use DAC as well?

We request EASA to consider adding the following NOTE or equivalent after the paragraph.

NOTE: In case DAC LUC tool outputs flight profile monitoring, the requirements of paragraph (1.4) of this AD do not apply.

#### **EASA response:**

**Comment agreed. Paragraph (1.4) has been amended to specify that it applies to Non-DAC usage only.**

### **Commenter 2: Singapore Aero Engine Services Pte Ltd – Malek Aziz – 30/05/2023**

#### **Comment # 2**

The Reason paragraph states that the revision to the TLM adds the post 72-J709 to the list of track parts. This is mentioned in chap 05-30 of the TLM. However, the definition of “The TLM” only covers 05-10 and 05-20. Does the PAD also mandates the 05-30 chapter of the TLM as well?



Since that AD was issued, Rolls-Royce revised the TLM to add the post-72-J709 low pressure (LP) turbine nozzle guide vane (NGV) to the list of tracked parts in Revision 24; to introduce flight profile monitoring in accordance with the latest revision of the Aircraft Maintenance Manual (AMM), to change the Declared Safe Cyclic Life (DSCL) and the Mandatory Time Between Inspections (MTBI) of the high pressure (HP) compressor Stage 4, 5 and 6 discs and cone rotor rear shaft, and to update the Direct Accumulation Counting (DAC) data files table in Revision 25; to revise the references to the AMM and to add certain air pipes (IP8-TBH Transfer Pipes, HP/IP bearing support air pipes, LP turbine bearing support air pipes) to the list of mandatory inspections in Revision 26.

**EASA response:**

***Comment noted. The reference to the tracking of post-72-J709 parts in the Reason section of the AD is part of the described changes implemented by revision 24 of the TLM, nothing more. AD does not require compliance with the items (tasks) specified in Chapter 05-30 of the TLM.***

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

