

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-051

[Published on 15 May 2024 and officially closed for comments on 11 June 2024]

Commenter 1: JAL Engineering – Koichi Nakano – 16/05/2024

Comment # 1

Step (1.3) of the PAD requires to ensure that DAC tables shown in the DAC life-usage calculator (LUC) tool match the applicable DAC Data Files as specified in the TLM.

The DAC LUC tool on the Rolls-Royce portal site is managed and controlled by Rolls-Royce, and the DAC Data Files are specified in the TLM accordingly in a timely manner by Rolls-Royce.

Both activities are done under Rolls-Royce responsibility, therefore, we wonder why the PAD requires operators to confirm their match. We consider if it should be solely confirmed by Rolls-Royce.

Please kindly advise EASA opinion.

EASA response:

EASA disagrees. The acceptability of the DAC method requires operators to use approved lifing data and an approved life cycle counting method. The TLM identifies the approved cycle counting methods, the declared lives, the approved version of the DAC LUC and DAC tables, as well as the instructions for use of the DAC LUC for critical part life management. The TLM also continues to provide complete instructions for those operators who chose not to use the DAC counting method.

The calculation of life consumption for critical parts remains the responsibility of the operator. Rolls-Royce may provide additional support services to their operators as a service provider, this is however conducted under the auspices of the operators Part M responsibilities.

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



Commenter 2: Delta Air Lines – Heidi Lee – 06/06/2024

Comment # 2

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No.: 24-051, dated 14 May 2024

Comment

Modify Ref (A) PAD, Required Action(s) and Compliance Time(s) section to remove paragraph 1.3 requirements.

Request justification

The DAC tables in the DAC LUC tool are maintained by Rolls-Royce and therefore the verification action to “(1.3) Ensure that DAC Tables show in the DAC life-usage calculator (LUC) tool match the applicable DAC Data Files as specified in the TLM.”

is not for operators to accomplish, it is for Rolls-Royce to accomplish. The DAC tables can only be found on each aircraft individually in DAC LUC tool and operators do not have access to modify the DAC Tables within the DAC LUC tool.

Rolls-Royce was contacted regarding the DAC tables and they have confirmed that the file names stored in DAC LUC tool are regularly verified to ensure the files match the applicable DAC Data Files as specified in the TLM. This is done automatically by Rolls-Royce without any operator input.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s):

- Remove requirement in paragraph 1.3

EASA response:

EASA disagrees. The acceptability of the DAC method requires operators to use approved lifing data and an approved life cycle counting method. The TLM identifies the approved cycle counting methods, the declared lives, the approved version of the DAC LUC and DAC tables, as well as the instructions for use of the DAC LUC for critical part life management. The TLM also continues to provide complete instructions for those operators who chose not to use the DAC counting method.

Operators need to ensure that the correct version of the DAC LUC and the correct DAC tables, as provided in the TLM, are being used at all times, this ensures that the operator is using the EASA approved lifing system. The requirement to do this is also stated in the TLM.

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

