

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-136R1

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Commenter 1: Deutsche Lufthansa AG – Patrick Körber – 24/03/2025

Comment # 1

Trent 900 TLM T-TRENT-9RR Rev. 68, TLM Task 05-20-01-800-801 Section R requires inspections of the IP8 Air Tubes.

The TLM identifies this requirement on PART Level (various specific P/N of IP8 Air Tubes). Since Rolls-Royce confirmed that the IP8 Air Tubes are not serialized, tracking and compliance demonstration is not possible as required by the TLM and the proposed AD.

Thus, operators are forced to track and demonstrate compliance on any higher Parts (e.g. the Module or the Engine). This condition will consequently lead to discussions between the Operator and the National Authority.

In similar cases within the TLM, specific requirements contain a NOTE to advise Subpart / Assembly relations to enable tracking and compliance demonstration on an assembly part (see TLM Subtask 05-10-01-890-038 and 05-20-01-800-801 Section O).

In the case of the IP8 Air Tubes, Lufthansa does not see any reason to deviate from a well-established standard.

Lufthansa, therefore, kindly asks EASA that only feasible requirements be mandated for operators.

EASA response:

Comment noted. TLM Task 05-20-01-800-801 Section R defines that the IP8 Air Tube inspections shall be accomplished in accordance with Trent 900 Cleaning, Inspection and Repair Manual task CIR TASK 72-00-00-200-801 at every refurbishment or overhaul shop visit. The applicable airworthiness limitation parameter is defined as “at every refurbishment or overhaul shop visit” which is clearly linked to the engine. It allows to control the task TLM Task 05-20-01-800-801 Section R at engine level and demonstrate compliance with TLM Task 05-20-01-800-801 Section R task by the engine records.

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

