

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-048

[Published on 13 March 2025 and officially closed for comments on 10 April 2025]

**Commenter 1: Delta Air Lines, Inc. – Wole Barnarde and Cecilia Teeuwen – 10/04/2025**

### Comment # 1

#### Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 25-048, dated 13 Mar 25
- (B) EASA Airworthiness Directive: No. 2007-0116-E, dated 04 May 07
- (C) Rolls-Royce Time Limits Manual (TLM) BR715 T-715-3BR Revision 68, dated 15 Nov 24

### Comment A

#### Commenter Request

Add Note to PAD 25-048 paragraph 1.2 to allow use of Rolls-Royce Deutschland Ltd & Co KG (RRD) instructions.

#### Request justification

The Maintenance Task and Replacement of Life Limited Parts Item (1.2) of the PAD instructs to accomplish all applicable maintenance tasks within the thresholds and intervals as specified in the TLM.

However, when the new and/or more restrictive tasks are implemented, there will be parts that will have already exceeded these new maintenance task threshold and intervals, and for which RRD will provide Technical Variances (TVs) to extend the threshold and intervals for those parts.

#### List paragraphs that change; describe (nonobvious) changes

#### **PAD 25-048 Paragraph 1.2, add the following note:**

NOTE: For parts that have already exceeded the new or more restrictive thresholds at the time of TLM incorporation, it is acceptable to contact RRD for approved instructions and to accomplish those instructions accordingly in lieu of the applicable maintenance tasks thresholds and intervals as specified in the TLM.

### Comment B

#### Commenter Request



Modify Credit section Ref (4) of this PAD, to add statement which provides operators with credit for more restrictive tasks which have already been previously accomplished on affected components.

Request justification

Section 4 of the PAD does not give credit for new and/or more restrictive tasks which have been previously accomplished before the limitations specified in the TLM. Section (4) should give credit for more restrictive inspections which have been previously accomplished before this PAD was issued.

List paragraphs that change; describe (nonobvious) changes

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

Delta proposes that Item (4) should include a statement which reads similarly:

“For an engine to which that AMP applies, it is acceptable for an operator to take credit for previously accomplished work which the new and/or more restrictive tasks of the TLM introduces, within the compliance times as specified in the TLM, as compliance with paragraph (1) of this AD.”

**EASA response:**

**Comment A. Comment not agreed.**

*Maintenance tasks required to be accomplished in accordance with the paragraph (1.2) of the AD are mandated by the AD to ensure the continuing airworthiness of the engine. Any deviation from intervals applicable to maintenance tasks contained in the TLM (or more generally mandated by an AD) requires EASA involvement and this involvement cannot be delegated to Rolls-Royce. For operators operating outside the EASA jurisdiction involvement of the local competent aviation authority may be needed and EASA is ready to provide any technical assistance for that, if requested. No changes have been made to the Final AD in response to this comment.*

**Comment B. Comment not agreed.**

*Based on the statement “Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished:” maintenance actions accomplished according to new TLM limitations before the effective date of the AD are accepted. No changes have been made to the Final AD in response to this comment.*

