

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-086

[Published on 18 June 2025 and officially closed for comments on 16 July 2025]

Commenter 1: Deutsche Lufthansa AG – Markus Mambour – 01/07/2025

Comment #1

There are two ways an Air Intake Cowl can become Part Number (P/N) SJ30820:

1. Produced as P/N SJ30820 (Production Standard ex Factory)
2. Modification to P/N SJ30820 per SB 71-H847 (e.g. Pre-MOD P/N SJ30361 or SJ30810)

The Compliance Section of Rolls-Royce SB RB211-71-AL136 (Paragraph 1.E.(2)(a)[1]) distinguishes between these two possibilities with regard to the initial inspection:

*“The inspection defined in Spirit AeroSystems NMSB RB211-NAC-71-024 is to be conducted upon each Air Intake Nose Cowl reaching the threshold of **5,000 flight cycles from new or since embodiment of Rolls-Royce Service Bulletin 71-H847.**”*

The Initial Inspection for Batch 2 Parts is described in Paragraph (2) of PAD 25-086 as follows:

*“...Before that Batch 2 part **accumulates 5 000 FC or 10 years**, whichever occurs first since first installation on an aeroplane, or within 12 months after the effective date of this AD, whichever occurs later...”*

DLH Engineering requests to clarify, if the initial inspection for Air Intake Cowls modified per SB 71-H847 has to be accomplished 5 000 FC or 10 years since first installation on an aeroplane (including the period as PRE-MOD P/N e.g. SJ30361 or SJ30810) or after first installation as P/N SJ30820.

As the affected design was introduced with embodiment of SB 71-H847, a clear differentiation of the two possibilities becoming a P/N SJ30820 for the initial inspection, as SB RB211-71-AL136 does, should also be considered for the Final AD.

EASA response:

Comment agreed. Final AD has been updated accordingly.

Commenter 2: Cathay Pacific Airways Limited – Coco Szeto – 03/07/2025**Comment #2**

Regarding EASA PAD 25-086, “Additional Requirements: (6) For Group 1 and Group 2 aeroplanes: From the effective date of this AD, do not accomplish the SRM repair FRSZ026 on any affected part.”, from airline perspective, there is no systematic way to set up control that restrains our MRO/ support shops from using the SRM repair since the manual they use is usually obtained from OEM website.

Could you please advise Rolls-Royce to set this repair as ‘inactive’ and update the manual, and remove/amend this requirement in EASA AD?

EASA response:

Comment noted. Roll Royce and Airbus confirmed that the Temporary SRM repair reference FRSZ026 was cancelled in March 2025.

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

Commenter 3: Swiss International Air Lines Ltd. – Xavier Wenceslao Casanovas – 04/07/2025**Comment #3**

SWR would like to explore the possibility of a paragraph revision. In particular, paragraph 2.

“Repetitive Inspections:

(2) For Group 1 aeroplanes having a Batch 2 part installed: Before that Batch 2 part accumulates 5 000 FC or 10 years, whichever occurs first since first installation on an aeroplane, or within 12 months after the effective date of this AD, whichever occurs later, and, thereafter, at intervals not to exceed 340 FC, inspect that Batch 2 art in accordance with the instructions of the SB.”

AD is not considering **VSB RB.211-71-H847** for Batch 2 inlets, mentioned in VSB RB.211-71-AL136 paragraph E.2. and SB 71-3042 Table 2 respectively: RB.211-71-AL136 rev. 14MAR25, paragraph E.2:

“(2) T.A.I. spray ring and T.A.I. feed pipe disengagement and restraint bracket inspection:

(a) Rolls-Royce recommends that the inspection procedures contained within Spirit AeroSystems NMSB RB211-NAC-71-024, 3. Accomplishment Instructions are completed in accordance with the following compliance periods:

*[1] The inspection defined in Spirit AeroSystems NMSB RB211-NAC-71-024 is to be conducted upon each Air Intake Nose Cowl reaching the threshold of 5,000 flight cycles from new **or since embodiment of Rolls-Royce Service Bulletin 71-H847.***



[2] For Air Intake Nose Cows that have accumulated more than 5,000 flight cycles by the NMSB initial issue date, inspect within 12 months from the NMSB initial issue date.

[3] For Air Intake Nose Cows that reach 5,000 flight cycles during the 12 months following the NMSB initial issue date, inspect within that 12 month period from the NMSB initial issue date.

[4] If the defined inspection confirms all restraint bracket assembly condition and the engagement of the feed pipe assembly to be satisfactory, two options are available to the operator:

[a] Do Rolls-Royce Service Bulletin 71-K923 as the terminating action for this NMSB.

[b] Conduct repeat inspections in accordance with Spirit AeroSystems NMSB RB211-NAC-71-024 every 340 flight cycles until Rolls-Royce Service Bulletin 71-K923 has been embodied as the terminating action."

SB 71-3042 R00:

Table 2, CONF 001 – SDI of the Thermal Anti-Ice Spray Ring Feed Pipe and Restraint Brackets for Engine 1 and 2.

CONDITIONS	ACTION	COMPLIANCE TIME		REPETITIVE INTERVAL
		THRESHOLD	GRACE PERIOD	
Aircraft with TRENT 700 engine having incorporated an improved inlet primary structure and piccolo tube (MOD 204615 and SB 71-H847) and not yet fitted with the extended feed pipe modification via Rolls-Royce Service Bulletin RB211-71-K923 (MOD 210288) on which SRM FRSZ026 (or equivalent) is not active on the intake cowl	Inspection of anti-ice feed pipe disengagement for A330 CEO TRENT 700 Ref. Task set A330-A-71-XX-3042-01ZZZ-93BZ-A	First inspection must be conducted within 5000FC	First inspection must be conducted with a Grace Period of 12 months from current SB release date	Subsequent inspections must be conducted every 340FC until implementation of the terminating action (RB211-71-K923)

Since SB 71-H847 requires a specific modification in the affected area, SWR understands that already performed inspections during the Inlet modifications in shop are at the same level of detail, and therefore 5.000 FC from SB embodiment might be considered.



Waiting for EASA's comments of the proposed modification.

EASA response:

See EASA answer to comment #1

Commenter 4: Lufthansa Technik AG – Jann Rauschenberger –15/07/2025

Comment #4

LHT Engineering would like to address following Comments for the upcoming AD to the attention of EASA:

A. AD paragraph: (2) Repetitive inspections:

As the modification according to RB211 71-H847 inspects, modifies, and changes the PN of the Air Intake Cowl to SJ30820 the AD inspection threshold should also reflect the embodiment of the MOD SB. E.g:

“The inspection defined in Spirit AeroSystems NMSB RB211-NAC-71-024 is to be conducted upon each Air Intake Nose Cowl reaching the threshold of 5,000 flight cycles from new or since embodiment of Rolls-Royce Service Bulletin 71-H847.”

This is also given in the inspection SB RB211 71-AL136:

[Quote 1.E.(2)(a)] :

[1] The inspection defined in Spirit AeroSystems NMSB RB211-NAC-71-024 is to be conducted upon each Air Intake Nose Cowl reaching the threshold of 5,000 flight cycles from new or since embodiment of Rolls-Royce Service Bulletin 71-H847.

[Quote End]

B. AD paragraph: (5) Terminating action:

The restrain brackets have been introduced with MOD 71-H847 which should eliminate the cracking and holing of the forward of the web stiffeners, forward bulkhead and boundary attachments.

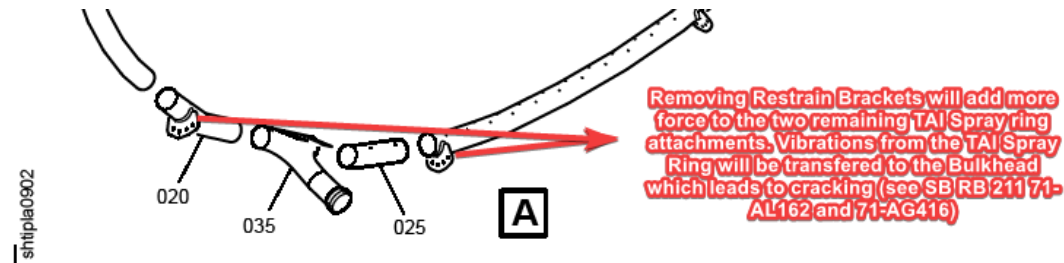
In addition, seizure of the Thermal Anti-Icing (TAI) spray ring attachment links due to corrosion, cracking of the TAI spray ring and unacceptable wear of the TAI links.

The Modification 71-H847 is considered Terminating Action for EASA AD 2016-0086 which addresses an inspection for these problems. Now the same problems arise with the post-mod cowls.



LHT Engineering doubts that the installation of a longer feedpipe will eliminate the cracking of parts as the feedpipe adds additional weight and force to the spray ring and its attachments which are no longer supported by the restraint brackets.

LHT Engineering awaits more cracking of further parts such as bulkhead and TAI spray ring and its attaching brackets in worst case scenario led to a disengagement of the longer feed pipe.



SPRAY RING, T.A.I. SYSTEM
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Figure 9A/GRAPHIC 71-60-00-99B-097-A01

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EASA response:

4A) See EASA answer to #1

4B) Comment noted. The design change supported by Airbus modification 210288 / Rolls-Royce SB RB211-71-K923 is deemed appropriately dimensioned. No changes have been made to the Final AD in response to this comment.

