

## COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-100

[Published on 04 July 2025 and officially closed for comments on 01 August 2025]

**Commenter 1: Deutsche Lufthansa AG – Patrick Körber – 11 July 2025**

### Comment # 1

Dear Ladies and Gentlemen,

PAD 25-100 refers to Table 1 in Appendix 1 of the NMSB for identifying affected air transfer tubes.

NMSB 75-AK920 Rev. 01 Appendix 1, Table 1 specifies 15 positions of IP8 air transfer tubes and 6 positions of HP3 air transfer tubes by referencing the Engine Illustrated Parts Catalogue. It also refers to AMM tasks for IP8/HP3 tube inspections to identify the tubes for on-wing inspection.

Both AMM tasks reference figures for the tubes to be inspected. These tasks apply to all Trent 1000 models, with the IP8 tube inspection task containing 40 figures across all engine marks, and the HP3 task referring to 16 figures.

For a -TEN engine, the number of IP8 and HP3 tubes identified by the AMM figures exceeds the number of positions specified for in-shop inspection. It is not clear if the on-wing inspection includes the same or different tubes than the in-shop inspection.

Lufthansa considers there to be a high risk of confusion and misunderstanding due to extensive cross-referencing across various documents and the requirement to check the multitude of 56 figures for applicability by Line Maintenance.

Please amend the final AD to provide consolidated accomplishment instructions that provide a clear summary of the affected tubes and their inspection requirements, like the information provided for in-shop inspections.

### **EASA response:**

***The AD requires inspection in accordance with the AMM task, which fully satisfies the requirements of Paragraph (1) of the AD. The IP8 AMM task is already included in the Maintenance Planning Document (MPD) and includes all IP8 tubes referenced in the NMSB.***

***The inspection instructions are consolidated and self-contained within the NMSB. The AMM provides clear visual guidance through a comprehensive set of figures (48 for IP8 and 20 for HP3), covering all relevant engine marks, including the -TEN variant. These figures are organized to support straightforward identification and inspection of the tubes without the need for complex cross-referencing.***



*While the NMSB lists a subset of tubes (15 IP8 and 6 HP3), all are included within the AMM task. The remaining 5 IP8 tubes not listed in the NMSB are covered by shop visit requirements under the Trent Lifecycle Maintenance (TLM) and do not affect compliance with the AD when performing the AMM task.*

*Rolls-Royce has confirmed that performing the AMM inspection inherently satisfies the AD and NMSB requirements. Therefore, the inspection process is sufficiently consolidated.*

*The wording of the final AD was amended to exclude the confusion and misunderstanding.*

## **Commenter 2: ALL NIPPON AIRWAYS CO., LTD. (ANA) – Yamamori Takashi– 30 July 2025**

### **Comment # 2**

#### **A.: Required Action(s) and Compliance Time(s):**

The required actions of the AD (Airworthiness Directive) are in accordance with Section 3 of NMSB 75-AK920 REV.1.

Could you please clarify if performing the inspection described in AMM B787-A-R75-22-00-01B-311A-A while the engine is on-wing is compiled to have inspected the applicable air transfer tube in Table 1 of Appendix 1?

#### **B. Required Action(s) and Compliance Time(s):**

In-Shop Inspection(s): PAD (4)(4.1) & (4.2)

The AD compliance states “during the next in-shop inspection”, but the NMSB compliance states “At next engine shop visit when a core module flange is separated (including Hospital and Check and Rectify shop visits)” below.

- (b) For all engines identified in 1.A. Effectivity, inspect the air tubes detailed in Appendix 1, Table 2 in accordance with section 3. Accomplishment Instructions as follows:

- [1] At next engine shop visit when a core module flange is separated (including Hospital and Check and Rectify shop visits) after the initial issue publication date of this NMSB.

ANA **requests** to change the AD compliance to “during the next qualified engine shop visit” in align with the NMSB compliance.



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

In-Shop Repeat Inspection(s): PAD (4)Table.2 Air transfer tube

The AD compliance states "During each qualified engine shop visit", but the NMSB compliance states " every shop visit where a core module flange is separated (including Hospital and Check and Rectify shop visits)" below.

(a) For all engines identified in 1.A. Effectivity, inspect the air tubes detailed in Appendix 1, Table 1 in accordance with section 3. Accomplishment Instructions as follows:

- [1] At next engine shop visit when a core module flange is separated (including Hospital and Check and Rectify shop visits) after the initial issue publication date of this NMSB.
- [2] For engines that are currently in shop on the initial issue publication date of this NMSB, inspect the air tubes detailed in Appendix 1, Table 1 in accordance with section 3. Accomplishment Instructions unless substantial rebuild has started, otherwise comply with 1.D.(1)(a)[2] or 1.D.(2)(a)[1], whichever occurs first.

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- [3] After initial inspection in accordance with paragraph 1.D.(1)(a)[1] or 1.D.(1)(a)[2] or 1.D.(2)(a)[1] or 1.D.(2)(a)[2], repeat the inspection at **every shop visit where a core module flange is separated (including Hospital and Check and Rectify shop visits).**

(b) For all engines identified in 1.A. Effectivity, inspect the air tubes detailed in Appendix 1, Table 2 in accordance with section 3. Accomplishment Instructions as follows:

- [1] At next engine shop visit when a core module flange is separated (including Hospital and Check and Rectify shop visits) after the initial issue publication date of this NMSB.
- [2] For engines that are currently in shop on the initial issue publication date of this NMSB, inspect the air tubes detailed in Appendix 1, Table 2 in accordance with section 3. Accomplishment Instructions unless substantial rebuild has started, otherwise comply with 1.D.(2)(b)[1].
- [3] After initial inspection in accordance with paragraph 1.D.(2)(b)[1] or 1.D.(2)(b)[2], repeat the inspection at **every refurbishment shop visit.**

ANA **requests** to change the AD compliance to " every shop visit where a core module flange is separated (including Hospital and Check and Rectify shop visits)" in align with the NMSB compliance.

**EASA response:**

**A.: Comment noted. Yes, inspection in accordance with AMM B787-A-R75-22-00-01B-311A-A is satisfactory to cover the air transfer tubes in Table 1. NMSB Section 3 just directs to accomplishment of this task.**

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



***B.: Comment agreed.***

***We have amended the Final AD accordingly.***

***C.: Comment noted. The PAD already makes a statement of what is a qualified shop visit in the AD Definitions section.***

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

