

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-143

[Published on 15 September 2025 and officially closed for comments on 13 October 2025]

Commenter 1: All Nippon Airways Co., Ltd. – Satoshi Ishibashi – 10/10/2025

Comment #1

<No.1> Paragraph: Modification

It is assumed that there will be cases where an engine, removed for modification in accordance with 72-AK645, is left unused and the modification is not completed within 67 months after the effective date of this AD.

In such cases, is it acceptable for the modification to be completed before release to service of the engine?

Please let us know the compliance time of the modification of such engines.

<No.2> Paragraph: Credit

ANA requests EASA to add the blue text on Credit as follows :

Modification of an engine, before the effective date of this AD, in accordance with the instructions of the original issue or revision 1 Rolls-Royce Alert TRENT 1000 72-AK645 [...]

EASA AD 2024-0122, which was issued in the effective period of 72-AK645 original issue, does not mention that 72-AK645 revision1 (or later revision) is acceptable.

Therefore, it should be clarified that engines modified in accordance with 72-AK645 original issue or revision 1 before the effective date of this AD are included in the Credit.

EASA response:

<No.1>Comment noted. After the compliance time of the AD is elapsed, for stored (not operated) engines it is acceptable to modify the engine before next flight.

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

<No.2>Comment noted. Paragraph (4) of the AD requires modification of the engine in accordance with the Rolls-Royce Alert TRENT 1000 72-AK645 Revision 1. This is required “unless this action has been already accomplished”. The Credit paragraph provides allowance for action accomplished before the effective date of the AD according to instructions which were/are different from that mandated by the AD.

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

