

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-163

[Published on 22 October 2025 and officially closed for comments on 19 November 2025]

Commenter 1: Delta Air Lines, Inc. – John Cox & Michael D. Tharp – 14/10/2025

Comment #1

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 25-163, dated 22 Oct 25
- (B) EASA Airworthiness Directive: No. 2025-0021R1, dated 22 Jan 25
- (C) Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) Trent 1000 72-AK449 Rev. 5, dated 11 Aug 25

Comment A

Commenter Request

Modify Ref (A) PAD, Corrective Action(s) paragraph (7) to clarify which repeat inspection intervals, in cycles and hours, require corrective action(s).

Request justification

Corrective Action (7) of the PAD requires actions if, during accomplishment of an AMM borescope inspection of the HPT blades, follow-on inspection is required “with a repeat interval of less than 50 FC (also considering any hour-based limitation)”.

Delta requests revision of this requirement to remove the parenthetical comment regarding hour-based limitations or to assign a numeric value to the hour-based requirement to remove ambiguity.

List paragraphs that change; describe (nonobvious) changes

Corrective Action(s)

- Paragraph (7): replace “...with a repeat interval of less than 50 FC (also considering any hour-based limitation) ...” with “...with a repeat interval of less than 50 FC...” OR “...with a repeat interval of less than 50 FC or 300 FH...”

Comment B

Commenter Request

Modify Ref (A) PAD to state that inspection accomplishment reporting is not required.



Request justification

Ref (A) PAD, paragraphs (1), (2), (3), (4), (7.1), and (7.2) require accomplishment of Ref (C) NMSB 72-AK449 Rev. 5. Section 3.A. Ref (C) NMSB Step 3.A.(1)(a)[2] and Step 3.A.(2)(a)[2] instruct to “Photograph and record the crack length of any axial cracking observed in Appendix-1.”

Appendix-1 of Ref (C) NMSB states:

This form (or similar) to be completed for every engine/component inspected.

Results to be sent to Rolls-Royce via your Service Representative.

Delta requests that Ref (A) PAD is modified to state that there are no reporting requirements, and that submission of Ref (C) NMSB Appendix-1 to Rolls-Royce is optional. The inspection criteria and corrective action requirements are clearly stated in the PAD and NMSB. Operators can adequately comply with the requirements of the PAD without Rolls-Royce involvement; submission of the Appendix-1 form for every engine inspected places an unnecessary administrative burden on operators.

List paragraphs that change; describe (nonobvious) changes

Inspection(s)

- Addition of a statement that submission of Appendix-1 of NMSB 72-AK449 is not required during completion of any inspections required by the PAD.

EASA response:

Comment A: Comment agreed and the final AD updated accordingly.

Comment B: Comment partially agreed. The AD mandates the part inspection and replacement in accordance with RR SB and maintenance instructions. The reporting per SB 72-AK449 Revision 5 par 3.A.(1)(a)[2] and 3.A.(2)(a)[2] is deemed RR service management relevant however is not mandated explicitly in the AD. Information about the reporting relevance is added into the Reason section, however no requirement introduced into the Required Action and Compliance Time has been made to the AD.

