

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-164

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Commenter 1: Delta Air Lines, Inc. – Michael Tharp & John Cox –24/11/2025

Comment #1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-164, dated 23 Oct 25

(B) EASA Airworthiness Directive: No. 2023-0186, dated 27 Oct 23

(C) Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) Trent 1000 75-AK962 Rev. 2, dated 15 Oct 25

Comment A

Commenter Request

Modify Ref (A) PAD, Corrective Action(s) paragraphs (6) to specify types of damage requiring tube replacement.

Request justification

Ref (A) PAD, Corrective Action(s) paragraphs (6) states that air tubes with “cracking, damage or any sign of air leakage wear” must be replaced before next flight or release to service of the engine. As currently written, the PAD will require replacement of tubes with any type of damage. This would include minor dents or scratches without signs of air leakage, which do not require tube replacement per Ref (C) NMSB.

Per Ref (C) NMSB Sections 3.A. and 3.B., air tubes must be rejected if the tube is found “cracked or signs of air leakage”, or if the air tube connectors are found “damaged or signs of air leakage”. Any damage type found on the air tube connectors requires rejection of the part, but cracking and signs of air leakage are specified as the only damage types on the air tube requiring rejection.

Delta requests that the Ref (A) PAD verbiage is revised to match the Ref (C) NMSB rejection criteria. This will avoid unnecessary replacement of tubes due to superficial damage which does not affect the internal cooling and sealing air flows to critical parts.

List paragraphs that change; describe (nonobvious) changes

Corrective Action(s)



Paragraph (6): replace “...cracking, damage, or any sign of air leakage wear...” with “...cracking, damaged air tube connectors, or any signs of air leakage...” OR Paragraph (6): replace “...cracking, damage, or any sign of air leakage wear...” with “...damage requiring rejection per Section 3 of the NMSB...”

Comment B

Commenter Request

Modify Ref (A) PAD to allow use of local methods to record follow-up inspections required by Ref (C) NMSB.

Request justification

Ref (A) PAD paragraphs (1) and (4) require inspections per Ref (C) NMSB 75-AK962, Section 3.A. Ref (A) PAD paragraphs (2) and (4) require inspections per Ref (C) NMSB 75-AK962, Section 3.B. Steps 3.A.(5) and 3.B.(4) instruct to “Make a record of the follow up inspection requirement instructed by this NMSB in the engine logbook.” Delta tracks maintenance accomplishment and requirements through various systems but does not routinely utilize the engine logbook to record on-wing maintenance activities or requirements.

Delta requests that Ref (A) PAD is modified to allow use of local methods to record follow-up inspections required by the NMSB in lieu of the engine logbook.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s)

Addition of a statement that local methods may be utilized to record inspection accomplishment and follow-up inspection requirements

Comment C

Commenter Request

Modify Ref (A) PAD to reference Revision 2 of Ref (C) NMSB.

Request justification

The Definitions paragraph of Ref (A) PAD references Revision 1 of Ref (C) NMSB. Rolls-Royce issued Revision 2 of NMSB TRENT 1000 75-AK962 on 15 October 2025, prior to the issuance of Ref (A) PAD.

List paragraphs that change; describe (nonobvious) changes

Definitions

Revise the definition of “The NMSB” to: Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) TRENT 1000 75-AK962 Revision 2.

Comment D

Commenter Request



Modify Ref (A) PAD to allow credit for all inspections already accomplished per previous revisions of Ref (C) NMSB.

Request justification

The Definitions paragraph of Ref (A) PAD references Revision 1 of Ref (C) NMSB, while Ref (B) EASA AD required accomplishment of the original revision of Ref (C) NMSB.

As currently written, Ref (A) PAD does not allow credit for inspections already accomplished on Group 2 engines per the original revision of Ref (C) NMSB.

Ref (A) PAD paragraph (1) Table 1 bases compliance time for onwing inspections of Group 1 engines on time since new or since last inspection per the original issue of Ref (C) NMSB. No such statement exists for Group 2 engines, so credit cannot be taken for on-wing inspections of Group 2 engines per the original issue of Ref (C) NMSB.

Additionally, credit is not given for all off-wing inspections which were accomplished per the original issue of Ref (C) NMSB.

Inspections may have occurred at an engine shop visit where a core module flange was not separated, but Ref (A) PAD does not give credit for these previously accomplished inspections.

The inspection procedures and rejection criteria did not change between the Ref (C) NMSB revisions, so credit should be allowed for previous accomplishment of inspections per previous revisions of Ref (C) NMSB. A paragraph stating this allowance would avoid rework of inspections previously accomplished per Ref (B) EASA AD requirements.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s)

Addition of a paragraph allowing credit to be taken for inspections already accomplished per previous revisions of Ref (C) NMSB.

EASA response:

Comment A: Comment agreed. We have amended the Final AD accordingly.

Comment B: Comment agreed. We have amended the Final AD accordingly.

Comment C: Comment agreed. We have amended the Final AD accordingly.

Comment D: Comment agreed. We have amended the Final AD accordingly.

