

## COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-035

Published on 20 March 2026 and officially closed for comments on 17 April 2026

**Commenter 1: Air Canada – Bert Liu – 15/04/2026**

### Comment # 1

- a. After several consultation with Rolls-Royce, it is understood that the inspection risk is very high. The rate of finding is also high. If this is the case, wouldn't be more suitable to render the modification via RB.211-71-K989 mandatory?
- b. Also, did the OEM bench-tested that RB.211-711
- c. After consulting with Rolls-Royce, Air Canada has understood, in case of findings, modification is necessary via SB RB.211-71-K989. The only approved MRO for performing this work is the OEM. Air Canada found this monopoly to be not competitive and the cost of shipping the Nose cowl is a financial and logistical challenge.  
For your background, Nose Cowl with PN: SJ30360 was previously subject to AD 2016-0086R1 inspection. Air Canada have elected to spend significant funds to retrofit them into SJ30820. However, we run into a Déjà vu scenario that the permanent repair solution is no longer permanent. Our executive has been questioning this high rate of finding inspection and almost mandatory modification with one sole supplier/ option. Can EASA please review with the OEM if better industry support is available to this Déjà vu non permanent repair and publish a new more transparent industry support to all operators.
- d. After reviewing RB.211-71-K989, the modification does not change the part number of the Nose Cowl. This will pose question and traceability issues. Can EASA review with the OEM if part number update should be considered?

### EASA response:

**Comment 1a) Comment noted. EASA consider that the repetitive inspections are adequate to ensure the required level of safety. Paragraph (3) of the AD accepts accomplishment of RB.211-71-K989 as an optional terminating action, at operator's discretion.**

**Comment 1b) EASA cannot provide this information. It is recommended to contact the OEM**



*Comment 1c) Comment noted. EASA has no authority to regulate the logistic and economic impact of an AD. Alternative solutions to those mandated by the AD can be evaluated through the AMOC process.*

*Comment 1d) Comment noted. EASA consider that traceability is ensured through the aircraft / part association documentation with mod/repair identification. The comment has been shared with the OEM for their evaluation.*

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

