

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-071

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Commenter 1: Singapore Aero Engine Services Private Limited (SAESL) – Muhammad Hazmi – 19/06/2026

Comment # 1

SAESL would like to seek clarification on EASA PAD 26-071 paragraph (9), if the exception for Group 3 engines should include engines that have embodied SB 72-L197, 72-L198, 72-L199, and 72-L200, rather than being applied solely to engines with IPC Shaft LV39838 installed.

Additional Requirements:

- (9) Except for Group 3 engines having IPC shaft assembly P/N LV39838 installed: From the effective date of this AD, modification of an engine in accordance with the instructions of Rolls-Royce SB Trent 1000 72-K571 (Trent 1000 engines) or SB Trent 1000 72-K570 (Trent 7000 engines), as applicable, is allowed, provided that, after modification, that engine is inspected and, depending on findings, corrected as required by this AD for Group 1 or Group 2 engine, as applicable.

EASA response: Comment noted. SAESL requests clarification on paragraph (9) of EASA PAD 26 071 regarding the exception for Group 3 engines, specifically whether it should remain limited to engines having IPC shaft assembly P/N LV39838 installed or be expanded to include engines embodying SB 72 L197, 72 L198, 72 L199, and 72 L200. Based on review of the PAD and associated Service Bulletins, it is noted that SB 72 L198 and 72 L200 introduce IPC shaft P/N LV39838, whereas SB 72 L197 and 72 L199 introduce IPC shaft P/N LV39600. Furthermore, SB 72 L197 and 72 L199 confirm that LV39600 remains two way interchangeable with previous shafts, meaning that embodiment of these SBs does not result in installation of LV39838 nor define a unique configuration. Consequently, SB embodiment does not provide a consistent or unambiguous basis to identify engine configuration, as different SBs lead to different shaft standards. In contrast, referencing the installed part number directly ensures clear, traceable, and configuration based applicability, consistent with the PAD's overall methodology. Expanding the exception to include SB embodiment could inadvertently capture engines fitted with LV39600, which represent a different design standard and were not intended to be covered by this exception. EASA therefore considers that the current wording based on IPC shaft P/N LV39838 is technically correct and should be retained, as it provides a precise, auditable, and unambiguous criterion for determining compliance.

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

