


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-080 [Published on the 10 September 2010 and officially closed for comments on the 08 October 2010]

Commenter 1 : Air France – Patrick Theodet – 06/10/2010
Comment # 1

Please find below AIR FRANCE comments on PAD 10-080, for Engine Directorate and Single Aisle Family engineering.

AA - SB 72-0777 and PAD recommend to replace within 1600 FH all concerned blades on aircraft with dual impacted engines.

Why SB and AD do not only require to clear one engine on such aircrafts within 1600 FH and the other within 5000 FH? This would be more consistent with the requirement on aircrafts with single engine affected (blade removal requested within 5000 FH).

BB - PAD 10-80 does not address treatment of adjacent blades.

Should a FOD occur, adjacent blades might be damaged due to contact with blades under SB 72-0777.

If the EASA, for some reason or in a near future, would elect to mandate such an inspection, please note that SB 72-0777 does not contain neither detail nor inspection criteria for this case.

Please consider that this would become a real burden at airline level.

AFR expects this kind of inspection be clarified by OEM and Authorities.

EASA response:

AA – For this engine type, our joint certification agreements with FAA require EASA and FAA to cooperate, and to issue a common AD wherever possible. Both SB 72-0777 and the EASA PAD were drafted in this way to address FAA concerns regards de-twinning AD's at engine level. Therefore, the SB and EASA PAD reflect a approach which allows each aircraft to accumulate a certain amount of risk, prior to rectification. For twin-affected aircraft, this risk is consumed more quickly, after which both engines must be rectified.

BB – Point contact is only predicted to occur following a severe FOD event, in which it is predicted that severe fan damage would result. This would require a thorough inspection of all blades.