


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p style="text-align: center;"><b>EASA PAD No. 12-140</b>  <b>[Published on 07 November 2012 and officially closed for comments on 05 December 2012]</b></p>

**Commenter 1: Qantas – Ben Nicholls – 21/11/2012**

**Comment # 1**

Regarding PAD 12-140, I have one comment:

Required action (2) states: "From the effective date of this AD, do not install a FOHE on an engine, or an engine on an aeroplane, unless the FOHE has accumulated less than 5 000 EH TSN or TSO."

I understand that the intent is for no FOHE above 5000 hours to be operated. My suggestion is to include this in the required action, as follows:

From the effective date of this AD, do not install a FOHE on an engine, or an engine on an aeroplane *and subsequently operate that engine or aeroplane*, unless the FOHE has accumulated less than 5 000 EH TSN or TSO.

The reason for the addition is that there might be a time where a FOHE is inadvertently physically installed onto an engine, say in the work shop. This may be identified from the paperwork or from the compliance system before operating the engine and the FOHE is immediately removed. In this case, the AD has been breached because the FOHE was installed even though the engine was never operated.

**EASA response:**

***EASA disagrees. This is a standard statement in EASA ADs. Installing a part on an engine, or an engine on an aeroplane implies that the engine is intended for subsequent operation. No changes have been made to the Final AD in response to this comment.***

**Commenter 2: Deutsche Lufthansa AG – Burkhard Culemann – 30/11/2012**

**Comment # 2**

regarding PAD 12-140 please consider the following two comments:

(1): In Section" Ref. Publications " the correct NMSB number should be RB.211-79-AH031.

(2): There is a good chance that the final AD will be issued shortly before Christmas. If this is the case, please [select] an Effective Date 28 days after final AD issue. This would provide sufficient time for the Operators to implement the required measures. Due to the fact, that the most critical FOHE's have already been replaced once according to 79-G945, it should be acceptable to provide this extra time.

**EASA response:**

**(1) EASA agrees. The Final AD will correct the number to RB.211-79-AH031.**

**(2) EASA disagrees.**

**The holiday period has no influence on Effective Dates selected by EASA. 14 days after AD issue date is the default period, unless otherwise justified by the risk assessment. The Effective Date for this Final AD will be set to 14 days after issue date.**

**The commenter mentions that “most critical FOHE's have already been replaced once according to 79-G945”. Indeed any FOHE removed in accordance with SB 79-G945 should have been replaced with a new or overhauled FOHE. Per the Final AD a new or overhauled FOHE may then operate for a total of 5 000 flight hours before being removed.**

**No changes have been made to the Final AD in response to comment (2).**

**Commenter 3: Meggitt Control Systems – Colin Troy – 4/12/2012**
**Comment # 3**

[Meggitt Control Systems, manufacturer of Fuel-to-Oil Heat Exchanger] do not object to Rolls Royce plc's proposed replacement time between overhaul (TBO) as a safety precaution. However, we consider that certain statements in the Airworthiness Directive are premature. The draft Airworthiness Directive includes in the 'Reason' that investigations have 'revealed the presence of oil by-pass seal material from the Fuel-to-Oil Heat Exchanger (FOHE) in the restrictor hole of the Tail Bearing Housing (TBH) cover plate' and that 'the blocked restrictor hole causes oil starvation to the LP (low pressure) and IP location bearings'.

We are not aware that either of these statements has yet been proven.

**EASA response:**

**EASA disagrees. The statements in the AD (as quoted by the Commenter) reflect factual findings from the investigation of the engine following the event. No changes have been made to the Final AD in response to this comment.**