

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-161 [Published on 21 December 2012 and officially closed for comments on 18 January 2013]

Commenter 1: Virgin America – Gareth O'Hagan – 21/12/2012

Comment # 1

Virgin America has reviewed PAD 12-161 and has a comment in relation to paragraph (4) of the Required Action and Compliance Time section.

That paragraph states "...on which no engines and/or no aft engine mount retainers have been removed since first flight...". Virgin America believe that this should instead state "...on which no aft engine mount retainers have been replaced since first flight...".

Engine changes are not the subject of this PAD, hence there should be no correlation between an engine change and the unsafe condition. The unsafe condition is dependent only on whether the aft engine mount retainer bracket was replaced with a non-conforming bracket.

EASA response: Comment not agreed

The PAD is in accordance with Goodrich SB applicability.

Furthermore, since engine mount retainers are not followed (tracked) during the aeroplane life, if an engine change is performed, the retainers could be changed for any reason without traceability. Based on those facts, the EASA view is that an engine change could conservatively be considered as a potential retainer replacement.

No changes will be made to the Final AD in response to this comment

Commenter 2: Aeroflot Russian Airlines – Nail V. Asadullin – 24/12/2012

Comment # 2

[From] the content of PAD [it] is not clear what we should do, if we have already implemented the Airbus AOT A71N001-12 Rev. 01 recommendations.

[In the PAD] there are no any exceptions for **earlier** performed corrective actions i.a.w. AOT A71N001-12 Rev. 01 or SB RA32071-146 Rev. 2, only for **later revisions**.

In other words, i.a.w. actual version of proposed AD we must be done a DVI of the aft engine mount retainers, within 3 months after the effective date, regardless of previous implementation.

EASA response:

Comment understood. Any action as required by the AD, if accomplished before the effective date of the AD, is acceptable to comply with that requirement, as confirmed by the opening statement “Required as indicated, unless accomplished previously”.

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

Commenter 3: Lufthansa Technik AG – Carsten Burk – 7/1/2013

Comment # 3

We would like to give 2 queries to modify the current documentation (SB RA32071-146 Rev.2).

1.) Query

There is a procedure **3.(4) Removal of Retainer brackets (3 locations)** in the current SB:

There are two methods to execute this procedure, with or without Bootstrap system.

To do it without the bootstrap system according to the SB, we need to check a gap (< 0,001 Inch / 0,025mm) between the pin head and anti-rotation bracket.

- a) What is the technical reason for this gap measuring?
- b) Why is a bootstrap system necessary if the gap is > 0,001 Inch / 0,025mm?

Our consideration is, to accomplish the replacement without a bootstrap system (in case of a finding).

2.) Query

We need a more specified differentiation between FINDING / NO FINDING for the Engine Mount retainers.

The pictures in the SB do not give a detailed decision base for a visual inspection (Replacement or not).

We hope for consideration of our mentioned points.

EASA response:

Answer to query 1) a): If there is a gap between the pin and the anti-rotation bracket during the tightening, damage can occur to the pin and the bearing.

Answer to query 1) b): The bootstrap is necessary to support the engine weight. The aim is to remove the loading of the pin to avoid damaging the part during tightening.

Answer to query 2): Unfortunately, the only method available to indicate the difference between FINDING / NO FINDING is the one provided in Goodrich Service Bulletin RA32071-146, currently at Rev.2.

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

Commenter 4: Air France – Patrick Theodet – 11/1/2013

Comment # 4

Please note that AIR FRANCE has no comment regarding PAD 12-161 for CFM56 aft engine mount retainers inspection.

EASA response:

Comment noted.

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

Commenter 5: Singapore Technologies Engineering Ltd. – Chee Teck, Teo (Mr.) – 18/1/2013
Comment # 5

The subject PAD No.12-161 [makes] reference to Airbus AOT A71N001-12 Revision 01 dated 09 August 2012 & Goodrich SB RA32071-146 Revision 2 dated 26 July 2012.

May we know how Part 145 engine maintenance organisation maintaining CFM56-5B engines can get access to these two documents as they are not made available to MRO?

EASA response:

Comment understood. EASA cannot supply or distribute service publications, or display them on our website. The reasons for this are mainly legal ones, as these documents contain proprietary information, owned by the approval holder of the product to which the AD applies.

For aircraft owners, operators and anyone else who must comply with the AD, these documents can be obtained (not necessarily free of charge) upon request from the approval holder of the product to which the AD applies. For that reason, EASA adds the approval holder's address and contact details in the 'Remarks' section of each AD.

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