


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No. 13-050</b></p> <p><b>[Published on 22 March 2013 and officially closed for comments on 19 April 2013]</b></p>

**Commenter 1: FAA ANE-142 – Frederick Zink – 26.03.2013**

**Comment # 1**

In reference to the above proposed AD could you include a draw-down schedule, as it is; if an engine on wing is at or above the new life limit, then the aircraft would be grounded until the engine is changed. Is this the intent of the AD to ground an aircraft if it is at or above the new life? Your attention to this would be greatly appreciated.

**EASA response:**

**Comment noted but not agreed.**

***It is considered that the information regarding the affected discs has been disseminated to the operators well before the PAD was published. This enables the operators to plan properly and thus to avoid service disruptions. However, in the unlikely case of an unscheduled engine removal being necessary in order to comply with the AD, it is considered that operators can still apply for an extension at their local authority.***

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

**Commenter 2: Rolls-Royce plc – Tony Martin – 19.04.2013**

**Comment # 2**

[Comment on] Appendix 1

The affected Trent 700 HPT disc serial numbers are currently fitted to both 772B and 772C engines. To ensure all the parts are tracked and confirmed as removed from engine, all serial numbers were included in NMSB 72-AH152. A concern was raised that the current DSCL (Design Service Cyclic Life) [of] 7,000 FC [as] stated in the TLM (Time Limits Manual) for HPT discs fitted to 772C engines is below the maximum life (8,687 FC) stated in the AD and NMSB 72-AH152. Although both the AD and NMSB specify reduced cyclic lives, this could potentially be misinterpreted as allowing these discs to fly on to 8687 FC.

Suggested resolution:

To edit Appendix 1 to include the statement: Current DSCL published in TLM or the Reduced Cyclic FC defined in the AD, whichever is lower.

**EASA response:**

*Comment noted and agreed.*

*Indeed, the initial issue of RR NMSB 72-AH152 requires some affected discs installed on Trent 772C engines to be removed at a cyclic life that is higher than their currently valid approved lives, thus raising the potential for misinterpretation. Therefore, RR revised the NMSB in order to prevent misinterpretation and to clarify that the cyclic life removal threshold, as required by this AD, is either the currently approved life, or the removal threshold quoted in the NMSB, whichever is the lowest.*

*The Final AD has been amended accordingly, to make reference to RR NMSB RB.211-72-AH152 Revision 1.*

**Commenter 3: Boeing – D.A. Biggs – 29.04.2013**

**Comment # 3**

**Subject: Comments, EASA PAD No. 13-050: Engine – High Pressure/Intermediate Pressure Turbine Discs – Identification/Replacement, Airplane Model 757**

Boeing has reviewed the subject NPRM and concurs with the contents of the proposed rule. Therefore, no additional comments will be forthcoming.

**EASA response:**

*Comment noted.*