EASA
European Aviation Safety Agency

Airworthiness Directive Reading Exercise

Note: More than one answer can be correct

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Your safety is our mission.

An agency of the European Union

Comments and Questions

Before sending any ‘continued airworthiness’ question to EASA, please review our AD Homepage and our AD FAQ.

For submitting your comments on a Proposed AD, click on “  send comment” just below the subject/description.

For a question concerning a specific AD, please check the CRD (if any) before sending in your question.

For any other (general) continued airworthiness (AD, SIB, etc.) questions, contact the EASA Safety Information Section at ads@easa.Europa.eu.

Reading of AD 2017-0149R1

Subject: This AD applies to CFM56-3 series engines and requires repetitive checks of the variable stator vane actuating system.

Operator case: The AD, in §(5), states that “it is allowed to install an affected engine on an aeroplane provided that, following installation, VSV travel checks are accomplished on that engine as required by paragraph (1) of this AD”.

AD 2017-0149R1

Reading of AD 2017-0149R1

Question 1: If an engine is removed during a maintenance check and the engine is re-installed on the same aircraft again, after installation, is a VSV travel check required?

a. Yes, before next flight.

b. No, only when due.

c. AD is unclear.

Explanation of AD 2017-0149R1

The correct answer (b.) can be found in §(5) of the AD: it is required that "following installation, VSV travel checks are accomplished on that engine as required by paragraph (1) of this AD".

The reference to §(1) indicates that the compliance times of that paragraph determine when action must be accomplished after installation: initially (if no VSV check has been done yet) before 30 August 2018, then (see Table 1) within 3 months or 12 months after the previous check, depending on the results of that previous check.

Reading of AD 2018-0002

Subject: This AD applies to certain Leonardo AB139 and AW139 helicopters and requires a software update.

The software versions 7.4, 7.7 and 7.10 must be replaced with ‘applicable’ software version 7.12 or 7.14 within 600 FH or 12 months.

AD 2018-0002

Reading of AD 2018-0002

Question 2: For helicopters not equipped with software version 7.4, 7.7. or 7.10, can that software be installed?

a. Yes, this is specified in the Leonardo SB.

b. No, the AD only allows ‘applicable’ software.

c. Yes, but the AD then requires replacement.

Explanation of AD 2018-0002

The correct answer (c.) is because, since the AD applies only to helicopters that have the 'affected' software installed, the AD does not apply to those with other (either earlier or later) software. Consequently, §(2) which allows only 'applicable "Primus Epic" system software' to be installed, also does not apply to those without the 'affected' software.

Leonardo has taken action to inform all operators, discouraging installation. SBs that would allow such action have been cancelled.

Reading of AD 2018-0018

Subject: This AD applies to certain CEAPR (formerly Avions Pierre Robin) aeroplanes and requires repetitive inspections of the NLG and corrective action(s). The AD also requires replacement of the existing types 1, 2 and 3 NLG units, before these exceed their respective life limits, with a new type 4 NLG.

AD 2018-0018

Reading of AD 2018-0018

Question 3: Paragraph (5) of the AD refers to a life limit. The first sentence says “Before exceeding the applicable life limit, or [ ] whichever occurs later”. Can you exceed a life limit?

a. No, a life limit can never be exceeded.

b. The AD regulates introduction of the life limit.

c. Yes, under certain conditions.

Explanation of AD 2018-0018

The correct answer (c.) is because the main purpose of an AD is not to ground aeroplanes, except for high safety-risk cases. Introducing a life limit where one did not exist before (on condition) often means there are parts which have exceeded that limit.

Allowing a ‘grace period’ avoids any unnecessary AOG. Answer (b.) is therefore also correct.

Reading of AD 2018-0023

Subject: This AD applies to Airbus A320 family aeroplanes and requires repetitive inspections of certain MLG fixed fairing assemblies and corrective action(s). The AD provides a terminating modification, and also requires, for certain aeroplanes (configurations) that have previously applied that mod, some additional work.

AD 2018-0023

Reading of AD 2018-0023 [Scenario 1]

Operator case: Our aeroplanes received the mod SB at Rev.02. By configuration, the SB at Rev.03 states that no additional work is necessary, so they are not subject to §(9) of the AD. Par.(10) of the AD states that only modification per SB at Rev.03, or as required by §(9), constitutes terminating action.

Reading of AD 2018-0023 [Scenario 1]

Question 4: How can we demonstrate compliance with requirement of § (10)?

a. Paragraph (10) does not contain any requirements.

b. If no additional work exists for a configuration in the mod SB at Rev.03, the aeroplane can be considered 'compliant' with §(9).

c. There is no terminating action for these aeroplanes.

Reading of AD 2018-0023 [Scenario 2]

Operator case: We have two affected parts in our stock, plate supports P/N D5284024820200 and studs P/N D5284024420000. Paragraph (6) states that replacement is not terminating action, while §(9) requires additional work.

Reading of AD 2018-0023 [Scenario 2]

Question 5: Is installation possible, in view of the §(6) and §(9) requirements?

a. Yes; §§(6) and (9) do not contain any installation prohibitions.

b. No, unless you modify the aeroplane as required by §(7) or§(10).

c. Not relevant; refer to §§(11) and (12) for installation requirements.

Reading of AD 2018-0032

Subject: This AD applies to DG Flugzeugbau (formerly Rolladen-Schneider) LS-4b sailplanes and requires inspection and modification of the air brake control system.

CAMO case: It was noticed that the TM, referred to in the AD, specifies that the tasks must “be performed by a PART-F or 145 Maintenance organization”.

AD 2018-0032

Reading of AD 2018-0032

Question 6: Part M.A.801(c) indicates that, for complex maintenance tasks on an ELA1 aircraft, certifying staff can sign for release. If that process is applied, are we non-compliant with the AD?

a. Yes. The AD requires the use of the TM instructions.

b. AD unclear; open to interpretation.

c. No. The Regulation overrides TC holder instructions.

Explanation of AD 2018-0032

The correct answer (c.) is because, whatever a DOA holder recommends, if regulation states something else or even the opposite, it should be clear that regulation prevails. In addition, it should be noted that, with few exceptions, an AD refers to a service publication (TM in this case) only for the 'how to' accomplishment instructions. Part 21.A.3B paragraph (d) specifies the five main elements that an AD must contain.

This means that, in nearly all cases, the only part of a service publication that an AD requires to be used are the 'Accomplishment Instructions'.

Reading of AD 2018-0043

Subject: This AD applies to Airbus A380 aeroplanes and requires a one-time inspection (either a DET or HFEC) of certain rear engine mount assemblies and, depending on findings, replacement.

Operator case: All affected aeroplanes have been DET inspected, before the effective date of the AD, per Airbus SB A380-71-8013.

AD 2018-0043

Reading of AD 2018-0043

Question 7: Do we need to perform DET inspections again?

a. Yes.

b. No, the AD itself specifies that this is acceptable.

c. Open to interpretation; AD does not specify.

Explanation of AD 2018-0043

The correct answer (b.) is because of the statement at the beginning of the **Required Action(s) and Compliance Time(s)** section of the AD: "Required as indicated, unless accomplished previously", which implies that, if you have already done what the AD indicates (e.g. modification), including using the instructions specified in the AD, no further action is required; unless repetitive actions are included, in which case you can (only) take credit for the inspection(s) already done.

Reading of AD 2018-0044

Subject: This AD applies to certain SAFRAN (formerly Turbomèca) ARRIUS 2 engines, all s/n, and requires replacement of certain (potentially affected) power turbine wheels (PTW). The AD also prohibits installation of those PTW.

Operator case: Regarding the requirement for an engine included in Group 2, which corresponds to all other engines, there is nothing [in the AD] to declare to do.

AD 2018-0044

Reading of AD 2018-0044

Question 8: What, if any, are the required actions for Group 2 engines?

a. No action is required.

b. Group 2 engines must be inspected.

c. Paragraph (2) is required for all engines.

Explanation of AD 2018-0044

The correct answer (c.) is because, by not identifying either Group in §(2), by default, that requirement applies to both Groups, i.e. all engines to which the AD applies (Applicability).

Reading of AD 2018-0051

Subject: This AD applies to certain EADS-CASA C-212 aeroplanes and requires repetitive inspections of the rudder pedal control system.

Operator case: On our C-212-400 aircraft, we carried out SB 212-27-0057C, as previously required by EASA AD 2017-0036, now superseded, and we installed kit SB212270057K03.

AD 2018-0051

Reading of AD 2018-0051

Question 9: Do we have to inspect our aircraft every 150 FH?

a. Yes; AD 2017-0036 is no longer valid and you must comply with this AD.

b. No, post-SB 212-27-0057 aircraft are excluded.

c. Unclear; open to interpretation.

Explanation of AD 2018-0051

The correct answer (b.) is because the AD Applicability states “except aeroplanes modified in accordance with the instructions of the SB”, while “the SB” is defined in the AD as EADS-CASA SB-212-27-0057.

As no revision is specified in that definition, having managed to do the modification per the original SB or any later revision (Rev. C in this case) is considered acceptable for exclusion from the AD Applicability.

Reading of AD 2018-0055

Subject: This AD applies to Rolls-Royce Deutschland (RRD) TAY 611-8C engines and requires implementation of the tasks and limits as specified in the latest revision of the applicable ALS document.

Operator case: The AD refers to RRD NMSB TAY-72-1835, which applies (Effectivity) to both TAY 611-8 Engines and TAY 611-8C engines.

AD 2018-0055

Reading of AD 2018-0055

Question 10: Do my TAY 611-8 engines need to comply with the AD, since the Effectivity of the NMSB mentions TAY611-8 and TAY611-8C engines?

a. Yes.

b. No.

c. Cannot be determined from the AD.

Explanation of AD 2018-0055

The correct answer (b.) is because the purpose of the AD is to require implementation of actions specified in the Rolls-Royce Deutschland (RRD) Time Limits Manual (TLM) T-TAY-6RR (revision 15 September 2016), which applies only to Tay611-8C engines.

NMSB TAY-72-1835 is not required by this AD, but is only referred to as a document providing alternative methods to establish the number of DFL treatments already applied to an engine.

Reading of AD 2018-0062

Subject: This AD applies to Airbus A330 and A340 aeroplanes and requires replacement of certain ram air turbine hydraulic pumps.

Operator case: The re-identification of not affected RAT pumps (Note 1 in the AD) is not at the same level of §(2) with a required action. It also seems that, for Group 2 aeroplanes, there is no mandatory requirement.

AD 2018-0062

Reading of AD 2018-0062

Question 11: Can you confirm our understanding?

a. No. For Group 2 aeroplanes, §(4.2) prohibits installation of an affected part.

b. Yes. Re-identification of not-affected parts is not required, as these do not represent a safety concern.

c. AD is unclear – open to interpretation.

Explanation of AD 2018-0062

The correct answer (b.), related to Note 1, is (in our view) self-explanatory.

Answer (a.), related to the commenter's Group 2 assumption, is also correct.

Reading of AD 2018-0067

Subject: This AD applies to certain Enstrom helicopters and requires repetitive inspections of certain main rotor assembly parts.

Operator case: The AD is based on an old version of SDB T-058 which no longer requires repetitive actions.

AD 2018-0067

Reading of AD 2018-0067

Question 12: What is the status of the AD and requirements?

a. AD is unclear – open to interpretation.

b. Actions are required as per the AD, regardless of the SB status.

c. Latest SB must be applied at all times.

Explanation of AD 2018-0067

The correct answer (b.) is because the AD refers to the instructions of an SB, which, even though a later SB revision is now available, are still accessible and adequate for compliance with the AD.

From EASA perspective, an SB, by itself, cannot ‘require’ actions. Only I when there is an AD that specifies that, or in case those SB instructions have been embodied into an approved AMP, the SB instructions can be considered ‘required’.

Reading of AD 2018-0091

Subject: This AD applies to Airbus A320 family aeroplanes and requires repetitive inspections of certain structural parts and, depending on findings, repair or replacement of those parts.

Operator case: Airbus SB A320-53-1259 allows the use of alternative fasteners. However, § (10) of this AD is more restrictive and gives credit for the use of P/N EN6081D5 only, a P/N which was not mentioned in the PAD.

AD 2018-0091

Reading of AD 2018-0091

Question 13: Does the AD to allow the use of alternate fasteners?

a. Yes.

b. No.

Explanation of AD 2018-0091

The correct answer (a.) is because §(10) is a ‘credit’ paragraph, allowing a records review (instead of doing the additional work as required by §9) if a certain action was accomplished before the effective date of the AD.

This means any flexibility, provided by the SB instructions for installing alternative fasteners, remains in place for action(s) after the AD effective date.

Reading of AD 2018-0093-E

Subject: This AD applies to CFM56-7B engines and requires repetitive inspections of certain fan blades.

Operator case: Our CFM56-7B engines are affected by the AD. Per the AD, initial inspection must be done before exceeding 20,000 fan blade cycles, or within 133 days after the effective date of AD, whichever occurs later. Repeat inspection must be at intervals not exceeding 3,000 cycles from the last inspection. Current cycles and fan blade cycles of our engines are below 7,000.

AD 2018-0093-E

EASA Note: Current valid AD for this subject is AD 2018-0211.

Reading of AD 2018-0093-E

Question 14: If we do the initial inspection at around 7,000 fan blade cycles (i.e. well before the threshold), is it acceptable to wait until 20,000 cycles before starting the repeat inspection?

a. No.

b. Yes.

c. Unclear – open to interpretation.

Explanation of AD 2018-0093-E

The correct answer (b.) is because the action at 7,000 engines cycles does not need to be recorded as compliance with an AD requirement (which is not due yet).

Dependant on whether the operator chooses (voluntary action) to record that action by referring to the AD, or only to the SB, that determines the next action.

If recorded as AD action, the next action is due within 3,000 engine cycles – if not, the threshold of 20,000 engine cycles determines the first AD-required action.

Reading of AD 2016-0142R1

Subject: This AD applies to Airbus Helicopters Deutschland MBB-BK117 and BO105 helicopters and requires a modification, removing the main rotor swashplate bellows, and post-mod inspections.

Operator case: The applicable ASB deletes the 100 FH repetitive inspection but maintains the inspection every 400 FH even after the application of the retrofit of the swashplate deflection ring. Our confusion is that there is supposed to be repetitive inspections of the swashplate after the retrofit but on the AD it can be interpreted as the terminal action.

AD 2016-0142R1

Reading of AD 2016-0142R1

Question 15: Does the AD require post-mod 400 FH interval inspections?

a. Yes.

b. No.

c. Unclear.

Explanation of AD 2016-0142R1

The correct answer (b.) is confirmed in the Reason section of the AD: "The 400 flight hours (FH) repetitive inspections are now recommended, and it is expected that they will be included in Chapter 05 of the AMM".

Reading of AD 2018-0095

Subject: This AD applies to Rolls-Royce Trent 1000 engines, requires repetitive inspections and imposes certain de-pairing limitations.

Operator case: Group 2 is defined as engines “that do not have an affected seal installed. An engine in pre-modification (mod) 72-J704 configuration, ESN below 10554, is a Group 2 engine, provided the engine remains in that configuration”. But engines which are post SB72-J603 and pre SB72-J704, do not have affected seal KH77674 installed. This definition is contradictory.

AD 2018-0095

Reading of AD 2018-0095

Question 16: Is the commenter's assessment correct, i.e. does the AD Definition contradict itself?

a. Yes.

b. No.

c. Unclear.

Explanation of AD 2018-0095

The correct answer (b.) is because only the pre-mod 72-J704 status is important to determine Group 2 status.

Post-mod 72-J704 engines have an affected part installed – see §§(6) and (7) of the AD.

SB 72-J603 (pre- or post-) is not relevant for the determination of this configuration.

Reading of AD 2018-0110

Subject: This AD applies to certain Airbus A320 'NEO' aeroplanes and requires modification of the engines by installing a new FADEC EEC software standard.

National authority case: Our standard process is to adopt the AD of the primary authority (Airbus product = EASA; IAE engine product = FAA). AD 2018-0110 is applicable to airframe (specific A320 NEO) so we adopted it.

AD 2018-0110

Reading of AD 2018-0110

Question 17: As it is engine FADEC EEC related, should the AD be applicable to IAE engine rather than specific Airbus A320 NEO?

a. Yes.

b. Could be either at aircraft or engine level.

c. No.

Explanation of AD 2018-0110

The correct answer (b.) is because the FADEC EEC can be seen as part of the engine type design, or as part of the aircraft type design – interface, actually. There is a case to be made for either aircraft- or engine-level AD action.

If an engine/FADEC EEC is installed on multiple aircraft type designs, experiencing the same problem, an engine AD is the most efficient action.

If (as in this specific case) the affected engine/FADEC EEC is installed on only a single aircraft type design, the logical action is to issue an aircraft AD.

Reading of AD 2018-0117R1

Subject: This AD applies to Airbus A380 aeroplanes and requires repetitive inspections of certain thrust reverser parts.

Operator case: This AD has a calendar scheduling (24 months or 1250 FC) [which means it] is [done] during C checks with a [downtime] of 1 or 2 months. We usually perform such inspection at the beginning of the visit in order to have time to procure [parts] if replacement is needed. In case of no findings, the inspection is completed at the beginning of the check. Considering that the wear on the [parts] is due to movement between engine and nacelle, no wear happens when aircraft is on ground.

AD 2018-0117R1

Reading of AD 2018-0117R1

Question 18: If we use the accomplishment date as a starting point, we may lose several weeks compared to the next C check interval. Can we use the CRS (Certificate of Release to Service) date of the check as a starting point of the calendar interval for next inspection?

a. Yes.

b. No.

Explanation of AD 2018-0117R1

The correct answer (a.) is because it is considered that, during a maintenance visit, the aircraft is in a ‘controlled environment’ and corrosion should have no (or negligible) impact.

See also our related AD FAQ and Regulation (Part M, AMP) FAQ.

Reading of AD 2018-0118

Subject: This AD applies to Airbus A380 aeroplanes and requires repetitive inspections of certain landing gear doors.

Operator case: If an affected part is removed from one aeroplane (from Group 1), then installed on another aeroplane (Group 1), the compliance times (threshold, and intervals) must address time accumulated by each affected part, or by the aeroplane.

AD 2018-0118

Reading of AD 2018-0118

Question 19: Do we need to inspect the affected part in accordance with SB A380-52-8165, before installation of this part on another aeroplane and before next flight?

a. No.

b. Yes.

c. AD does not specify.

Explanation of AD 2018-0118

The correct answer (a.) is clear from Note 1: “Unless stated otherwise, the FC specified in Table 2 of this AD are those accumulated by the affected part since its first installation on an aeroplane”.

This means the next due action is determined by the FC accumulated by the part (since the previous inspection), not by FC of the aircraft on which it happened to be installed at the time of that previous inspection, nor by the FC of the aircraft on which it is installed now.

Reading of AD 2018-0121

Subject: This AD applies to Rolls-Royce RB211 Trent 900 engines and requires in-shop replacement of LPT blades, installed on certain modules.

Operator case: The AD requires the replacement of LPT blades on affected modules listed in the RR NMSB72-AJ933. However, the AD does not have a terminating action and it also does not instruct a one-off replacement.

AD 2018-0121

Reading of AD 2018-0121

Question 20: Does the AD require a one-off replacement for the LPT blades installed on the modules listed in the NMSB?

a. Yes.

b. No.

c. Open to interpretation.

Explanation of AD 2018-0121

The correct answer (a.) is because the AD does not require any repetitive actions (no interval specified).

This is also the reason why ‘terminating action’ is not relevant in this case, since that is only used in ADs to denote the allowance (e.g. following modification) of stopping repeat actions (e.g. inspection) which were previously started.

This AD does not require any engine modification, only removal from service of certain parts known to be installed on certain modules, listed in the NMSB.

Reading of AD 2018-0125

Subject: This AD applies to Austro Engines GmbH E4 engines, which retains life limits for certain parts, and requires a modification, installing new parts, which cancels the life limits.

Operator case: I have an engine with a waste gate controller that has already used 200 FH before MSB-E4-022/3 was released. We haven't got the new part(s) yet and the regulation time is exceeded (MSB states: 200 FH after 30/04/2018).

AD 2018-0125

Reading of AD 2018-0125

Question 21: Is it acceptable to replace existing waste gate controllers [when they reach] 250FH, until the new part is available after the effective date of the AD, to comply with §(3) modification requirement?

a. Open to interpretation.

b. No.

c. Yes.

Explanation of AD 2018-0125

The correct answer (c.) is because the ‘regulation time’ for modification that the commenter refers to, as specified in the MSB (200 FH after 30 April 2018, but not later than 31 October 2018), is not imposed by the AD.

Compliance is required by the AD after 04 July 2018 (200 FH or 6 months). This means that any waste gate controller / circlip that reaches 250 FH (since new, i.e. first installation) before the AD-imposed limits, can still be replaced (no change in P/N involved) without the need to modify the engine at that time.

Reading of AD 2018-0131

Subject: This AD applies to Airbus A320 family aeroplanes and requires repetitive detailed inspections of certain fitting lugs.

Multiple operator comments: The Effectivity of SB A320-92-1119 (for Group 2 aeroplanes) is all manufacturer serial numbers (MSN) that were delivered in post-mod 35869 configuration, while aeroplanes (MSN) in post-mod 157335 configuration are not included.

AD 2018-0131

Reading of AD 2018-0131

Question 22: Can EASA confirm that the AD does not apply to my aircraft, i.e. that my aircraft does not need to be inspected?

a. Open to interpretation.

b. No.

c. Yes.

Explanation of AD 2018-0131

The correct answer (b.), that the aircraft is subject to inspection by the AD, is confirmed by the Applicability (post-mod 157335 aircraft not excluded) and explained in the Reason of the AD, where it is stated that "Analysis is still ongoing to confirm mod 157335 as terminating action for the requirements of this AD".

Reading of AD 2018-0141

Subject: This AD applies to Airbus A350 aeroplanes and requires a one-time insulation check of certain electro-static actuators (EHA).

Operator case: As per §(7) of AD 2018-0141 "From the effective date AD, do not install an affected EHA on any aeroplane", I understand that we cannot install an affected EHA (aileron, elevator or rudder, as listed in each applicable SB) on aircraft anymore, even if they were checked and re-identified in accordance with the applicable SB.

AD 2018-0141

Reading of AD 2018-0141

Question 23: Is the operator's understanding correct?

a. Open to interpretation.

b. No.

c. Yes.

Explanation of AD 2018-0141

The correct answer (b.) is provided by the definition of ‘affected EHA’, which excludes “those that are paint marked, as defined in the applicable SB”.

Note that the ‘applicable SB’ (3 separate SBs, as defined in the AD) provide instructions at component level, to be done in-shop at operator discretion, which allow those EHA to become serviceable again (no longer ‘affected EHA’) and therefore eligible for installation.

Note that these ‘off-aircraft’ actions are not (do not need to be) required by the AD, since they do not affect the safety of the aircraft.

Reading of AD 2018-0151

Subject: This AD applies to Airbus A330 and A340 aeroplanes and requires repetitive inspections of certain flap track sensor struts.

Operator case: Compliance time for those with less than 1,000 FC is: “Before exceeding 24 months, or within 18 months after the effective date of this AD, whichever occurs later, but not exceeding 2 300 FC”. As the 24 months occurs later, it might be more clear to say: “Before exceeding 24 months after the effective date of this AD, but not exceeding 2 300 FC”.

AD 2018-0151

Reading of AD 2018-0151

Question 24: Is the operator correct?

a. Yes.

b. Open to interpretation.

c. No.

Explanation of AD 2018-0151

The correct answer (c.) is given by Note 1: "Unless specified otherwise, the FC and calendar time indicated in Table 1 of this AD are those accumulated by the aeroplane since first flight".

This means the 24 months (like the 'less than 1 000 FC', and the '1 000 FC or more') in Table 2 represents time since first flight of the aeroplane, **not** counted after the effective date of the AD.

Reading of AD 2018-0180

Subject: This AD applies to Airbus A320 family aeroplanes and requires implementation of certain airworthiness limitations actions.

Operator case: With reference to §(2) of the AD, during ALS task performing, discrepancies are found, and the system failure is listed as an item in the Airbus MMEL.

AD 2018-0180

Reading of AD 2018-0180

Question 25: Can we dispatch the aircraft according to Airbus MMEL?

a. This is subject to acceptance by the ‘competent authority’ of the State of Registry of the aircraft.

b. Yes, provided the MMEL limits are observed.

c. No, MMEL is not ‘maintenance documentation’.

Explanation of AD 2018-0180

The correct answer (b.) is because the MMEL is approved (by EASA) Airbus documentation, containing maintenance instructions.

There is another correct answer (a.), since the operator's MEL, which is approved by the competent authority (State of Registry of the aircraft), may contain differences – could be more restrictive than the MMEL, not less – which might override those in the MMEL.

Reading of AD 2018-0211

Subject: This AD applies to CFM56-7B engines and requires repetitive inspections of certain fan blades.

Operator case: An engine (held as spare) with blades installed having less than 30,000 cycles accumulated since new, as of 18 May 2018, initial inspection must be complied with before 30 June 2018. When still held as spare at that time (cannot be inspected), the engine becomes ‘unserviceable’ by default.

AD 2018-0211

Reading of AD 2018-0211

Question 26: Does the AD allow installation of a spare engine (which missed the initial inspection compliance period), provided the engine will be inspected, before further flight and/or aircraft release to service?

a. No. An EASA AMOC approval is necessary to allow that.

b. Yes.

c. No. An exemption is necessary to allow that.

Explanation of AD 2018-0211

The correct answer (b.) is because an engine, even if non-compliant with an AD, cannot cause an unsafe condition on an aircraft until the engine is installed and operated on that aircraft.

The ultrasonic inspections (per the S/B) can be done while the engine is on-wing, as clarified in the definition of ‘serviceable fan blade’.

Reading of AD 2018-0216

Subject: This AD applies to certain CFM International LEAP-1A engines and requires introduction of new FADEC EEC software.

Operator case: We have noted that there is no explicit statement with regards to the compliance of off-wing / spare engines that have pre-mod software.

AD 2018-0216

Reading of AD 2018-0216

Question 27: Does the AD have to be complied with within 90 days for off-wing engines ?

a. Yes.

b. No.

c. Open to interpretation.

Explanation of AD 2018-0216

The correct answer (b.) is because an engine, even if non-compliant with an AD, cannot cause an unsafe condition on an aircraft until the engine is installed and operated on that aircraft.

The SW update can be done after installation of a pre-mod (non-compliant) engine on the aircraft.

Minor point, but for the record: “Within 3 months after the effective date” means compliance time expires 22 January 2019. This is not the same as the ‘90 days’ that the commenter refers to, which would expire on 20 January 2019.

Comment/Query on PAD/CRD process

Subject: PAD > comments received (CRD) > Final AD

Operator case: The CRD process does not work well!

- EASA issue a PAD and operators comment on the PAD
- EASA release Final AD, the content may have changed to that of the proposed AD (unknown to operators)
- Operators have no visibility of the changes until it has been released as an AD.
- Upon viewing the AD, if changes have been made, operators now must contact EASA to request clarification.

EASA PAD/CRD process

Question 28: What is your opinion (based on your experience) on the EASA PAD/CRD process?

a. Positive – keep as is.

b. Negative – needs improvement.

c. Neutral – do not know.

EASA Position on PAD/CRD process

The CAP indicates that, in case changes are introduced after PAD release that would increase the burden to operators (e.g. reduced compliance time(s), additional requirement(s), expanded Applicability), that PAD must be revised and re-published for further consultation.

EASA is committed to a transparent system (as much as practically feasible). For Final ADs ‘with request for comments’ (no PAD issued), we plan to introduce a consultation period closure date, with all comments received within that period to be published (CRD).

Document for AD Compliance

Subject: An EASA AD requires the use of a specific issue of a referenced document (e.g. SB). The action is already scheduled (not yet done), but now a revision of the SB has been issued.

Document for AD Compliance

Question 29: Am I required to use the ‘current’ revision of the SB to comply with the AD?

a. Yes.

b. No.

c. Do not know.

Explanation on ‘later approved’ SB

When an SB (for which an AD exists) is revised, it is allowed to use that revised SB, not required.

[However, it does make common sense at any time to use the latest revision voluntarily, as this may contain improved (or corrected) instructions]

For the record, EASA PR.CAP.0001 (procedure for CA) specifies that, when a TC holder introduces changes into a revision of an EASA AD-related SB concerning

- Applicability (expanding or reducing affected fleet),
- Compliance Time, or
- Accomplishment instructions (the nature of required actions),

it is (nearly) certain that EASA AD action (revision, supersedure, etc.) will follow, sooner or later.

IMPORTANT: Commenting on (P)ADs

EASA always appreciate your comment(s), but we would prefer to receive them during the public consultation phase of the PAD which precedes the Final AD.

Feedback received during PAD consultation allows us to avoid errors and improve the readability of our ADs.

We publish answers to PAD comments and queries in a CRD, which may assist other operators in understanding our ADs.

Note that on our website, you can subscribe to e-mail notification of all new PADs (see User Guide).

IMPORTANT: interpretation

EASA is not the competent body to interpret EU Law (or its implementing rules), the prerogative for which rests with the judicial institutions. Consequently, any information included in the answers as provided in (and during) this presentation concerning regulation cannot be considered in any way as legally binding.

EASA
European Aviation Safety Agency

Hope to see you next year!

Any further questions (AD specific, or general) can be submitted to EASA:

E-mail ads@easa.europa.eu

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