

EASA Proposed CM-21.A-J-001 Issue 01 – Service Bulletins (SBs) related to Airworthiness Directives (ADs) - Comment Response Document

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	EASA	1.1	4	This paragraphs refers to "Service Bulletins related to Airworthiness Directives". I suggest extending these good practices to any Service Bulletin	Add a sentence explaining that these good practices can apply to any SB.			Not Accepted	This CM is specifically related to Service Bulletins related to Airworthiness Directives. Including such a sentence might cause confusion and trigger questions by unintentionally extending its scope.
2	EASA			Consistent use of abbreviations or full word in the whole document In Rulemaking we write the full word the first time it appears and put into brackets the abbreviation and the following times we just use the abbreviation . (Certification Memorandum is written in full in several occasions although you have an abbreviation for it)				Accepted	
3	EASA	2	5	In section 2 you refer to design organisations, but in the abbreviations list you talk about design approval holders				Accepted	Changed to Design Approval Holders.
4	EASA	3	6	Second paragraph the first sentence seems to be incomplete (in accordance???)				Accepted	"in accordance" was a left-over from a previous draft and has been deleted.
5	EASA	3	6	Harmonization	Harmonisation			Accepted	"Harmonization" has been replaced by "Harmonisation".
6	EASA	4.1.2	7	Standardized, minimize	Standardised, minimise			Accepted	The text is amended accordingly.
7	EASA	4.1.2	7	should be written so owners/...	So that owners			Accepted	The text is amended accordingly.
8	EASA	4.1.2	7	Owners/ operators can understand and follow the accomplishment instructions	Owners/ operators ...I would add maintenance organisations			Accepted	The text is amended accordingly.
9	EASA	4.1.2	7	Giving clear detailed illustrations	Giving clearly detailed illustrations			Not Accepted	The proposal would change the meaning of the sentence which in its current version aims at "clear" AND "detailed", not at "clearly detailed".
10	EASA	4.1.3	8	Paragraph (b)(1)(b) critical requirements (...) in manuals that are not EASA approved	What is a manual "EASA approved"?			Noted	"not EASA approved" means manuals, or parts of them, which are not directly approved by EASA (e.g. ALI sections have an EASA approval).
11	EASA	4.1.3	8	(b)(2)(c) refers to "other airplane systems"	It should be "other aircraft systems"			Accepted	The text is amended accordingly.
12	EASA	4.1.9	12	Section (a)(2), you refer to documents approved by a regulatory authority	What do you mean by regulatory authority? Is it the competent authority of the SoD? Wouldn't be EASA?			Accepted	The term "regulatory authority" has been replaced by "competent authority" throughout the document.
13	EASA	4.1.9	12	Section (b). "use this flexible language when referring to procedures in documents acceptable to the Agency or the competent authority and when the operator may use the document or their own procedures that is acceptable to the competent authority	In this paragraph refers 2 times to competent authority, could you please clarify which competent authority are you talking about? In the first instance I would say that it is a SoD			Not Accepted	The competent authority may be the authority of the State of Registry.

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14	EASA	4.1.9 4.3.1	12	<p>The use of the word operator in these paragraphs can create confusion. Since you talk about SBs that require maintenance to be performed then you would have to consider that in accordance with continuing airworthiness regulations the SB instructions are intended for maintenance organisations or persons performing maintenance.</p> <p>The operator and the maintenance organisation would be most of the times 2 different entities, with two different competent authorities.</p> <p>In 4.1.9 paragraph (b) you refer to an operator's procedure accepted by the competent authority could also be used. If you are talking about "maintenance procedures" then it would not be an operator procedure, because the alternative maintenance instructions are only approved to maintenance organisations. (145.A.40 (a)(1) or 145.A.45 (d))</p>	I would suggest refer to organisation instead of operator and add a paragraph in the beginning of the CM explaining that "organisation" means "end user"			Partially Accepted	Where applicable, the term "operator" has been replaced by "organisation". A definition of organisation as "end user" is not deemed necessary.
15	EASA	4.2.2	14	The first paragraph should end with a stop.				Accepted	The text is amended accordingly.
16	EASA	4.3.1	15	Maintenance providers	Maintenance organisations			Accepted	The text is amended accordingly.
17	EASA	4.3.2	15	<p>By not putting the compliance instructions on the SB but referring to the AMM or other ICA we are creating a need to have a permanent subscription to those ICA. I think in the General aviation world this is not so common for the operators.</p> <p>Besides, having to "jump" from the SB to the AMM is it not adding Human factors issues? (Lapses, missing tasks)</p>				Not Accepted	This is standard practice for many DAH. EASA cannot prohibit that SBs refer to other ICA for detailed accomplishment instructions.
18	EASA	4.3.5	16	In the note you refer to the competent authority, which competent authority do you want to refer?				Not Accepted	See reply to comments No 12 and 13 of this CRD.
19	EASA	4.4	17	<p>Point 5, this means that the SB would not offer the complete picture of maintenance to be performed from beginning to end. Would the SB list all the systems affected which may need of additional functional test?</p> <p>Again I'm concerned with HF and tasks which may be missing</p>				Not Accepted	See reply to comment No 17 of this CRD.
20	EASA	ALL		Inconsistent use of EASA and the Agency through the document.	You should use only one term, since you are putting EASA in the abbreviations it would seem logical to use only EASA			Accepted	"EASA" is being used throughout the document instead of "Agency".
21	EASA	ALL		Clarification on the use of "competent authority", "regulatory authority"				Not Accepted	See reply to comments No 12 and 13 of this CRD.

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22	Cessna Aircraft Company	Para 3 4.1.4		<p>3</p> <p>"Only Service Bulletins related to ADs should be labelled "mandatory" by the design approval holder."</p> <p>4.1.4</p> <p>"b. For SBs originally written for reliability or economic enhancements that subsequently are found to provide correction of a safety issue, those SB should be revised to include the "Safety Intent" and "Configuration Description" paragraphs per the guidance in this CM."</p> <p>This is a significant change for Cessna and it contradicts years of precedent with the FAA regarding the classification of our SBs. The second quote (from 4.1.4) points out one of the difficulties with this approach; SBs will require revision just because of timing of the authority's decision on an AD. Cessna does not believe that this increases safety. If anything it will delay availability to the field of the SB (as an applicant may delay issuance until the AD question is settled). Cessna would also like clarification on which language should be in the SB if two authorities disagree about it being an AD.</p> <p>The guidance in this certification memorandum should be harmonized between the FAA and EASA.</p>	Allow use of the term mandatory in accordance with established definitions of the design approval holder (DAH), i.e. we the DAH call it mandatory if we think it is safety related or a non-compliance; cert authority determines whether it rises to their threshold of requiring an AD and invokes it.			Not Accepted	As shown in section 3. "EASA Certification Policy" of the CM, the content of this document is similar, for harmonization reasons, to FAA Advisory Circular 20-176 "Design Approval Holder Best Practices for Service Bulletins Related to Airworthiness Directives". Reference in the SB should only be made to the expected issuance of an AD from the State of Design authority.
23	Airbus			Airbus regrets that this document is not well adapted to European practices				Noted	Justifications/details to support this statement would be appreciated.
24	Airbus	1.3	4/24	FIM s applies only on A300 Airbus aircraft other programs uses Trouble Shooting Manual .	Suggest FIM/ TSM	Yes	No	Accepted	The text is amended accordingly.
25	Airbus	1.3	4/24	Airbus do not have Overhaul Manual		Yes	No	Noted	
26	Airbus	1.3	5/24	Airbus have Electrical Standard Practice Manual ESPM	Suggest SWPM/ ESPM	Yes	No	Accepted	The text is amended accordingly.
27	Airbus	1.3	5/24	Airbus have Aircraft Wiring Manual	Suggest WDM/ AWM	Yes	No	Accepted	The text is amended accordingly.
28	Airbus	§3	6	Airbus agrees, but noted that confusion could be reduced if time delay between SB and AD is optimised		Yes	No	Noted	
29	Airbus	4.1.3.b.(2)(c) 4.1.6.b.	8 10	Appendix A not found.	Add the appendix (refer to Annex I?).	Yes	No	Accepted	The text is amended accordingly, i.e. "Annex" instead of "Appendix".

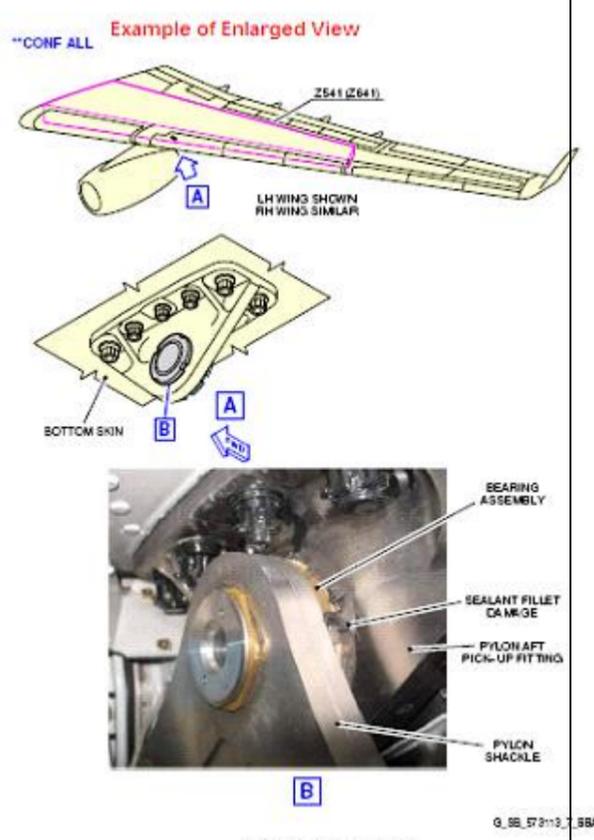
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30	Airbus	4.1.3.c.	8	Clarify whether an AMOC will be needed or not to use a document revision subsequent to the one referenced in a SB.	Amend the paragraph c to read : If a SB references other documents that will be required for compliance with an AD (reference paragraphs 4.1.9 and 4.1.10 of this CM), include the revision level and date of the other document(s) as required by the AD	No	Yes	Not Accepted	The current text is considered as adequate. The AD does not show all documents referenced in the applicable SB. As a consequence, in the mentioned case, an AMOC is not necessary, provided that subsequent revisions of the documents referenced in the SB do not change the AD requirements.
31	Airbus	4.1.4	8-9	Safety intent paragraph Safety consideration shall be only in the AD	No specific paragraph will be included but the information will be in the "reason paragraph" to identify the associated potential unsafe condition	Yes	No	Noted	Refer also to comment No 95.
32	Airbus	4.1.4 a 2 c	9	Part- Subpart Airbus manages the configuration at Equipment Part Number level as per approved management configuration rules. The sub-assembly traceability is ensure by the part number evolution of the "Upper assembly"	Propose an alternate paragraph, Or for DAH having rules for configuration management at equipment part number level, identify the part number only	Yes	No	Noted	What is defined in the CM as "Configuration Description" can also be an "Upper assembly description" in the SB, i.e. simply quoting the "evolution" of the upper assembly part-number.
33	Airbus	4.1.6.c.	10	Appendix B not found.	Add the appendix (refer to Annex II?).	Yes	No	Accepted	The text is amended accordingly, i.e. "Annex" instead of "Appendix".
34	Airbus	4.1.7.d.	11	Appendix C not found.	Add the appendix (refer to Annex III?).	Yes	No	Accepted	The text is amended accordingly, i.e. "Annex" instead of "Appendix".
35	Airbus	4.1.8.a.	11	Editorial	"[...] Consideration should be given to requests from operators or the Agency as to whether a logic-based diagram would be helpful."	Yes	No	Partially Accepted	The text was changed to "any request".
36	Airbus	4.1.8.a.	11/24	Airbus Operators know only Flow chart so suggest to indicate both terminologies.	To add flow chart in the title Logic-based Diagrams (flow charts)	Yes	No	Accepted	Text was amended accordingly.
37	Airbus	4.1.9.b.	12	To prevent the ambiguity described in the previous comment, it is advisable to list the MRBR and the SRM in this paragraph.	Add to the list the Maintenance Review Board Report (MRBR) and the Structural Repair Manual (SRM).	Yes	No	Accepted	Text was amended accordingly.
38	Airbus	4.1.10 C (1)	13/24	Tip Sheets European operators may not understand this terminology	Replace Tip Sheet by adequate wording or delete it	Yes	No	Accepted	"Tip Sheets" has been replaced by "Guidance Material".
39	Airbus	4.2.2.a.(1)	14	"Product" means an aircraft, engine or propeller (ref. Article 2 of regulation (EC) No 216/2008). The use of this term in this sub-paragraph is ambiguous.	The sub-paragraph 4.2.2.a.(1) could be modified to read: "Type/model of product or part number of affected component(s) ".	Yes	No	Accepted	Wording changed as suggested.
40	Airbus	4.3.2.b.	15	Sub-paragraph (3) is a duplication of sub-paragraph 4.1.6.e.(4), and the first two sentences of sub-paragraph (4) are a duplication of sub-paragraph 4.1.3.b.	Eliminate duplications (prefer reference to the paragraph).	Yes	No	Partially Accepted	Additional references to paragraphs 4.1.6.e (4) and 4.1.3.b have been included into paragraphs 4.3.2.b (3) and 4.3.2.b (4).
41	Airbus	4.3.4.	16	This paragraph is a duplication of sub-paragraph 4.1.6.e.(4).	Eliminate duplications (prefer reference to the paragraph).	Yes	No	Accepted	Paragraph 4.3.4 has been deleted.
42	Airbus	4.3.6	16	Cross reference in the front of DAH maintenance manuals (s) could be restrictive. AD/SB cross-referencing media should be left to the DAH convenience	Replaces maintenance manuals by technical publication(s)	No	Yes	Partially Accepted	The term "maintenance manual" has been replaced by "technical publication", but recommendation to cross-reference SB and AD is not changed (it is merely a recommendation; DAH can do differently, if deemed appropriate).

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43	Airbus	4.3.6 Figure 2	16/24	Airbus have different SB -TO -AD -Cross Reference	<p>Consider the attached extract of SIL cross-ref index as alternate way.</p> <p>Example of SB-to-AD Cross Reference</p> <p>A340 MODELS AT DATE OF 20-APR-2012</p> <p>CROSS REFERENCE INDEX</p> <table border="1"> <thead> <tr> <th colspan="7">AIRFRAME AIRWORTHINESS OBJECTIVES</th> </tr> <tr> <th>EUAD</th> <th>AD</th> <th>SUBJECT</th> <th>P A A</th> <th>EFFECTIVE DATE</th> <th>MEANS OF COMPLIANCE OR EQUIVALENT MEANS</th> <th>REMARKS</th> </tr> </thead> <tbody> <tr> <td>2010-0271</td> <td>2011-02-08</td> <td>Auto Flight - Auto Pilot & Auto-Thrust Disconnect - Operational Procedure</td> <td>Y</td> <td>05-JAN-2011</td> <td>AFM A340 TR 150 OR MSB A340-27-4174 OR MSB A340-27-4182 OR SIL: AD 2011-0198B1</td> <td>Within 15 days after the effective date of this AD, amend the applicable Airplane Flight Manual (AFM) to incorporate the following operational procedure, and operate the airplane accordingly.</td> </tr> <tr> <td>2011-0007R1</td> <td></td> <td>Doors - Forward and Aft Cargo Compartment Doors - Inspection</td> <td>Y</td> <td>28-FEB-2011</td> <td>ADT A340-52A4062 ADT A340-52A4061</td> <td>Refer to AD for detailed applicability and refined compliance time.</td> </tr> <tr> <td></td> <td>2011-04-05</td> <td>Time Limits and Maintenance Checks - Airworthiness Limitations Section Part 1 - Amendment</td> <td>N</td> <td>02-MAR-2011</td> <td>A340 ALS PART 1 RS</td> <td>Refer to AD for action and compliance times.</td> </tr> <tr> <td>2011-0032</td> <td></td> <td>Landing Gear - Nose Landing Gear (NLG) - NLG Main Fitting - Modification</td> <td>Y</td> <td>15-MAR-2011</td> <td>MSB A340-32-4282 OR MOD 200618</td> <td>Before the NLG has accumulated 60 months since its first flight on an airplane or since its first flight after its last overhaul, as applicable, or within 24 months after the effective date of this AD, whichever occurs later, modify the NLG main fitting in accordance with SB A330-32-3241 or SB A340-32-4282.</td> </tr> </tbody> </table>	AIRFRAME AIRWORTHINESS OBJECTIVES							EUAD	AD	SUBJECT	P A A	EFFECTIVE DATE	MEANS OF COMPLIANCE OR EQUIVALENT MEANS	REMARKS	2010-0271	2011-02-08	Auto Flight - Auto Pilot & Auto-Thrust Disconnect - Operational Procedure	Y	05-JAN-2011	AFM A340 TR 150 OR MSB A340-27-4174 OR MSB A340-27-4182 OR SIL: AD 2011-0198B1	Within 15 days after the effective date of this AD, amend the applicable Airplane Flight Manual (AFM) to incorporate the following operational procedure, and operate the airplane accordingly.	2011-0007R1		Doors - Forward and Aft Cargo Compartment Doors - Inspection	Y	28-FEB-2011	ADT A340-52A4062 ADT A340-52A4061	Refer to AD for detailed applicability and refined compliance time.		2011-04-05	Time Limits and Maintenance Checks - Airworthiness Limitations Section Part 1 - Amendment	N	02-MAR-2011	A340 ALS PART 1 RS	Refer to AD for action and compliance times.	2011-0032		Landing Gear - Nose Landing Gear (NLG) - NLG Main Fitting - Modification	Y	15-MAR-2011	MSB A340-32-4282 OR MOD 200618	Before the NLG has accumulated 60 months since its first flight on an airplane or since its first flight after its last overhaul, as applicable, or within 24 months after the effective date of this AD, whichever occurs later, modify the NLG main fitting in accordance with SB A330-32-3241 or SB A340-32-4282.	Yes	No	Accepted	The provided example has been added to the existing one (table 3).
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44	Airbus	Annex II	18/24		SWPM/ESPM	Yes	No	Accepted	The text is amended accordingly.																																										
45	Airbus	Annex III 1. and 2.	19-20/24	Shade/Cross Hatch Important Areas-Phantom Lines Our competitor uses instructions in the figures, not Airbus.	<p>Suggest to add one Airbus/ or EASA manufacturer Figure</p> <p>Example of Fantom/shade</p>	Yes	No	Accepted	The figure has been inserted into the document.																																										

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46	Airbus	Annex III 3.	21/24	Example of Enlarged Views in Figures	Add Airbus/or EASA manufacturer figure with photograph  <p>Figure A-UBBAA - Sheet 01 Examples of Bearing Assembly Sealant Fillet Damage</p>	Yes	No	Accepted	Figure has been replaced by proposed Airbus figure.
47	CAA UK			No comments				Noted	
48	Dassault Aviation	§3	6	Dassault Aviation agrees with the EASA that only the SB mandated by an Airworthiness Directive should be labelled as Mandatory. But industrial constraint and publication lead times make it sometimes difficult or impossible to coordinate SB publication date with AD availability. Even AD number is not often available in a timely manner so that it can be included in the original issue of the SB. This is why since more than 10 years Dassault Aviation has been issuing "Mandatory" SBs in anticipation of an AD. The EASA has consistently agreed with this practice, provided a clear statement is added in the Approval section of the SB that reads "It is anticipated that this S.B. will be rendered mandatory by an EASA Airworthiness Directive". We believe that this practice is in the best interest of public safety by making the SB issued as soon as possible and that the statement in the second paragraph of section 3 should be amended accordingly	Instead of "This also applies to cases where a Service Bulletin indicates that it has been published in anticipation of an Airworthiness Directive (AD), to be issued by the competent authority (Agency or other authority acting as State of Design) at a later stage." We suggest : "This does not apply to cases where a Service Bulletin indicates that it has been published in anticipation of an Airworthiness Directive (AD), to be issued by the competent authority (Agency or other authority acting as State of Design) at a later stage, provided the Authority has notified its intent to issue such an AD and a clear statement is added in the SB (i.e. It is anticipated that this S.B. will be rendered mandatory by an EASA Airworthiness Directive). "	No	Yes	Not Accepted	Also SBs followed by identical ADs do not themselves have a legally mandatory character equivalent to an AD. However, it is recognised by EASA (see second last paragraph of chapter 3 of this CM) that labelling SBs as "Mandatory" is useful in cases where an SB is directly related to and followed by an identical AD.

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49	Dassault Aviation	4.1.3 c.	8	<p>The reference to other documents should mention the revision level and date but also authorize to use later revisions. This is a major discrepancy between the EASA and the FAA policies. EASA AD usually refer to SB or AMM procedures to a given revision and recognizes the later revisions as also acceptable. The FAA due to federal regs cannot allow such policies and is bothered (along with the US operators with issuing numerous AMOC just to authorize using a revised AMM procedure for compliance with an AD. EASA should maintain its own policy on this matter.</p>	<p>Amend the paragraph c to read : If a SB references other documents that will be required for compliance with an AD (reference paragraphs 4.1.9 and 4.1.10 of this CM), include the minimum revision level and date of the other document(s) "or later revision".</p>	Yes	No	Partially Accepted	<p>It is true that EASA ADs very often make reference to a certain revision of SB or later approved version, for example "The use of later approved revisions of these documents is acceptable for compliance with requirements of this AD". We don't see why TCH couldn't do the same within their own publications. However we should not exclude situations where this is purposely not acceptable, or if it is not achievable.</p> <p>Text has been changed to: <i>"If a SB references other documents that will be required for compliance with an AD (reference paragraphs 4.1.9 and 4.1.10 of this CM), include the revision level and date of the other document(s). If applicable, acceptability of later approved version of documents may be mentioned in the SB."</i></p>
50	Dassault Aviation	4.1.6	10-11	<p>In the technical publication standards, "Notes" is not a generic term that covers also Warnings and Cautions (ATA iSpec2200 §3.1.6 -1.7). Notes are placed AFTER the text that they relate to, Cautions and Warnings are placed BEFORE the text they relate to.</p> <p>Cautions and Warnings are very important pieces of information that can have legal involvement and they cannot be qualified as "informational only" as stated in 4.1.6.a.</p>	Amend the whole paragraph to be in line with Technical Publications standards.	Yes	No	Accepted	<p>Cautions and Warnings are not accomplishment instructions by definition, and we agree that they should not be. But they may contain very important information directly related to health, personnel safety or flight safety. For example a recommendation not to perform maintenance on multiple engines installed on a same A/C, or the use of protective equipment when handling such or such product / tool etc. We can see why they may have legal implications for manufacturers, although not directly related to the mandatory aspect of the SB itself (such cautions and warnings are used in every SB and other tech pubs). We would be in favour of keeping them very visible, before the accomplishment instructions, or alternatively to let the TCH decide where they should go.</p> <p>The text is amended accordingly.</p>
51	Dassault Aviation	4.1.7.a.	11	<p>This statement is bringing the publication standard back to the times when illustrations were rare, expensive and subject to suspicion as they were hand-made from several drawing sources. The modern electronic documentation is now much more illustration based. These illustrations are directly produced from 3D models. Moreover, reducing the text helps eliminating many misinterpretations due to language difficulties from non native English speaking mechanics.</p> <p>We understand and generally support the EASA/FAA harmonization efforts but in this case the mere copy of the FAA AC makes the whole industry to go backwards. EASA should actively support the moves to 21st century technology and differentiate its regs from the FAA.</p>	<p>Delete paragraph a; Or replace by: To avoid misinterpretation, use figures, illustrations, and drawings to supplement or replace the accomplishment instructions. If a discrepancy between the accomplishment instructions and a figure, illustration, or drawing exists, the discrepancy must be evaluated and corrected.</p>	No	Yes	Not Accepted	<p>Figures, illustrations and drawings cannot replace the accomplishment instructions.</p>

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52	Dassault Aviation	4.1.8.b.	11	Same comment as above. On one hand the introduction of the paragraph 4.1.8 recognizes that complex effectivity or accomplishment instructions are difficult to follow, and recommend that the logic-based diagram is used. On the other hand it states that only the text is authoritative. This is illogical. Compared to 3 or 4 levels of embedded "IF" text statements, a logic-based diagram IS the best way to make sure that complex conditional instructions are understood and followed	Delete first sentence in §b; and delete sub paragraph b; (2)	No	Yes	Not Accepted	Logic based diagrams cannot replace detailed accomplishment instructions: diagrams can never include the same level of detail in comparison to the accomplishment instructions.
53	Dassault Aviation	4.3.6.	16	We agree with the AD/SB cross-referencing but the location of such an information should be left to the OEM's choice. The AMM might not be the best place for that.	Let the location open to the OEM's choice.	Yes	No	Accepted	See response to comment No 42.
54	Turbomeca	§ 4.3.6	16/24	This CM requires TC holders to include a SB-to-AD cross reference list in the maintenance manuals. We do not agree with this request as this lead to a transfer of responsibilities. Engine TC holder has not the responsibility to provide the list of AD's to operators or to maintenance/repair organisations. In the case of an incomplete/not up-to date list, this may have legal impacts against TC holders. In addition, related SB(s) are referenced in any AD.	Remove this request for Engine DA/TC holders.	No	Yes	Accepted	The text has been changed accordingly: "Except for the case of engine/propeller DAH, a SB-to-AD cross reference listing with SB revision levels should be included in the front of the DAH's technical publication to help owner/operators identify which SBs are related to ADs."
55	Turbomeca	§ 4.3.6	16/24	This CM requires TC holders to include a SB-to-AD cross reference list in the maintenance manuals. We do not agree with this request as such a list will never be up-to date. Maintenance manuals are generally updated periodically (e.g. annually) and therefore such a list will not contain the AD's issued since last manual revision. Such incomplete list will be confusing for operators and for maintenance/repair organisations and might lead to non-application of the more recent AD'S by them. It is also not acceptable to ask Engine manufacturers to revise their manuals at each AD issued by EASA.	Remove this request for Engine DA/TC holders.	No	Yes	Accepted	Refer to comment No 54.
56	Turbomeca	§ 4.3.6	16/24	This CM requires TC holders to include a SB-to-AD cross reference list in the maintenance manuals. We do not agree with this request as such a list could only contain EASA AD's. It cannot be envisaged to include all the AD's issued all around the world. Therefore the efficiency of such a list is questionable for operators and maintenance/repair organisations for which EASA is not the applicable Agency. In addition a foreign Authority may issue an AD even if EASA has not issued an AD; This additional AD will not be in the list.	Remove this request for Engine DA/TC holders.	No	Yes	Accepted	Refer to comment No 54.

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57	Turbomeca	§ 4.3.6 – figure 2:	16/24	Figure 2 is not useful. - Number of what? SB, AD? - What means "incorporated"? - What is the meaning of "No effect" in the column titled "incorporated" ? - What does mean the date of the "incorporated" column? What is incorporated? Where? - What means "Started/completed"? What is started? What is completed?		No	Yes	Accepted	The text is amended accordingly. Refer also to comment No 43.
58	Turbomeca	§ 4.3.6 – figure 2:	16/24	§ 4.3.6 is out of the scope of this CM as defined in § 1.1 which is how to draft SB's and not what is to be contained in the maintenance manuals.	Remove § 4.3.6	No	Yes	Not Accepted	Refer to comment No 54.
59	Turbomeca	§4.3.5	16/24	This paragraph may be understood as requiring that any modification of an Engine maintenance manual (EMM) (outside the Airworthiness Limitation Section (ALS)) should be approved by EASA if it has been duplicated or referenced in any EASA AD. For example, installation/removal procedures which are specified in the Engine MM are often referenced in SBs related to Ads, and then would become parts of the EMM (in addition to the ALS) for which changes are to be approved by EASA (by major changes process?). If this is the EASA intent this will increase workload, delays and cost in the EMM revision process without obvious added value. If this is not the EASA intent, please clarify.	Clarify the intent and provide examples applicable to Engines in order to avoid unnecessary heavy process.	No	Yes	Not Accepted	The scope of this paragraph is to encourage DAH to have a better control of any part of their technical publications becoming requirements in ADs. As specified in the current text, this "flagging" procedure should be used by the authors of technical publication for their use , i.e. not on the ICA provided to the operators. By doing this, DAH will know that whenever an instruction (e.g. an inspection procedure) which is also quoted in an AD is changed the Agency or the competent authority must be informed.
60	Turbomeca	4.1.2 (2)	7	The paragraph assumes that the SB/AD will always lead to a new configuration. In practice, a single or repetitive inspection might provide the resolution – sometimes with no further action.	(2) ".....of the new configuration or inspection that manages the unsafe condition."	No	Yes	Not Accepted	The clarification regarding the inspections to be done to prevent the development of the unsafe condition must be part of the SB safety intent. The inspection by itself is not a corrective action.
61	Turbomeca	4.1.3.b (2)(c) 4.1.6 (c) 4.1.7 (d)		References to Appendices/Para Numbers should refer only to Annexes. In Addition Annexes A, B, and C do not exist.		No	Yes	Accepted	Same as comments No 29, 33 and 34.
62	Turbomeca	4.1.5.a Table 1 (Example 1)	10	In the second column, the word 'cold' is unnecessary. Should be deleted. Unit in Celsius should come first.	Write as follows" ...in temperature below 0 degrees Celsius (32 degrees Fahrenheit)"	No	Yes	Accepted	The text is amended accordingly.
63	ASD	4.1.2 (2)	7	The paragraph assumes that the SB/AD will always lead to a new configuration. In practice, a single or repetitive inspection might provide the resolution – sometimes with no further action.	(2) ".....of the new configuration or inspection that manages the unsafe condition."	No	Yes	Not Accepted	Refer to comment No 60.

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64	ASD	4.1.3.b (1)(b)	8	The use of the term 'critical requirements' is misleading, is not defined and is open to interpretation – even with the examples cited. The SB will, in any case, contain only those requirements that are essential to comply with the planned AD. It is sufficient to refer to the '...the requirements that must be met...'. Delete the word 'critical' and simply refer to 'requirements' – throughout the document.	No	Yes	Partially Accepted	Wording has been changed to: "Critical requirements (i.e. requirements which are required for the compliance with the AD, such as torque values, gap measurements, electrical bonding, etc.) in procedures that exist in manuals that are not EASA approved." Any SB contains also instructions which are not essential to comply with the corresponding AD (e.g. how to access the inspection area).	
65	ASD	4.1.3.b	8	At least for some DAH, standard practices are normally not considered as EASA approved data. This para. is not clear. Is it the intent that 4.1.3.b.(1) should deal with what should be written in the SB and 4.1.3.b (2) with what should be referenced? Clarification requested.	No	Yes	Partially Accepted	The given interpretation is correct. This is now better clarified in the CM text. Any SB contains also instructions which are not essential to comply with the corresponding AD (e.g. how to access the inspection area). Refer to comments No 30 and 49.	
66	ASD	4.1.3.b (2)(c) 4.1.6 (c) 4.1.7 (d)		References to Appendices/Para Numbers should refer only to Annexes.	Yes	No	Accepted	Same as comments No 29, 33 and 34.	
67	ASD	4.1.4.a.2 (a)	9	The phrase '...or susceptible to reversal in operations' is not understood.	Clarification/rewording requested.	No	Yes	Accepted	The wording "i.e. unintended/unwanted de-modifications" has been added.
68	ASD	4.1.5.a Table 1 (Example 1)	10	In the second column, the word 'cold' is unnecessary. Should be deleted. In any case, the phrase should be written as '...0 degrees Celsius (32 degrees Fahrenheit)...'.		Yes	No	Accepted	Refer to comment No 62.
69	ASD	4.1.5.b	10	The word 'tolerances' in this context is not understood. Clarification required.		No	Yes	Accepted	The sentence has been changed to: "Each DAH should develop criteria to prevent the use of ambiguous language in SBs and consider implementing one or more of the following items".
70	ASD	4.1.6.a	10	To be consistent with the terminology earlier in the paragraph, suggest that the term 'critical step' is replaced by the phrase 'specific requirement' or 'specific instruction'.		No	Yes	Accepted	The term "critical step(s)" has been replaced by "specific requirement(s)".
71	ASD	4.1.8	11	The term 'Flow Chart' is better understood than 'Logic-Based Diagram'. Suggest this latter term is removed throughout the document.		Yes	No	Partially Accepted	Refer to comment No 36.
72	ASD	4.1.8	11	To clarify the intent and remove unnecessary text, suggest that paragraph is amended.	'...is a useful tool to assist owners/operators in choosing identifying the best intended corrective path, such as repetitive inspections or a terminating modification, based on the discovered condition and compliance times.'	No	Yes	Accepted	The text has been changed accordingly.
73	ASD	4.3.6 Figure 2	16	The example is not particularly helpful and appears incomplete. By the way, this is the first figure (not the second).				Not Accepted	Refer to comment No 43.

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74	ASD	4.3.6	16	<p>SB to AD Referencing</p> <p>(1) The updating of maintenance manuals (MM) cannot realistically be expected on every occasion that an AD is issued. As a consequence, such a cross-reference list will be of limited value, could be confusing to operators and might lead to non-application of the most recent ADs.</p> <p>(2) The cross-reference list would be of little interest to non-European operators who would be required to comply with their own states ADs.</p> <p>(3) As defined earlier in the CM, changes to other documents is outside the defined scope of the CM.</p>	EASA are requested to reconsider the implications of this paragraph (4.3.6)	No	Yes	Not Accepted	<p>The CM now refers to a SB-to-AD cross reference listing to be included in one of the DAH technical publications, not necessarily the maintenance manual.</p> <p>Non-European operators would be aware of the state of design ADs associated to the SB, this info would be therefore of great interest for anyone.</p> <p>The CM does not require any change to other documents; it only suggests providing important and helpful information to interested parties.</p>
75	ASD	Annex II para 5.	18	".....fastener head or not <u>nut</u> to"		Yes	No	Accepted	The text has been amended accordingly.
76	Rolls-Royce plc	4.1.2 (2)	7	The paragraph assumes that the SB/AD will always lead to a new configuration. In practice, a single or repetitive inspection might provide the resolution – sometimes with no further action.	(2) ".....of the new configuration <u>or inspection that manages</u> the unsafe condition."	No	Yes	Not Accepted	Refer to comment No 63.
77	Rolls-Royce plc	4.1.3.b (1)(b)	8	The use of the term 'critical requirements' is misleading, is not defined and is open to interpretation – even with the examples cited. The SB will, in any case, contain only those requirements that are essential to comply with the planned AD. It is sufficient to refer to the '...the requirements that must be met....'.	Delete the word 'critical' and simply refer to 'requirements' – throughout the document.	No	Yes	Partially Accepted	Refer to comment No 64.
78	Rolls-Royce plc	4.1.3.b (2)(b)	8	Standard practices are normally not considered as EASA approved data.	Delete 4.1.3.b.(2)(b) as already covered by 4.1.3.b.(1)(b)	No	Yes	Partially Accepted	Refer to comment No 65.
79	Rolls-Royce plc	4.1.3.b (2)(c) 4.1.6 (c) 4.1.7 (d)		References to Appendices/Para Numbers should refer only to Annexes.		Yes	No	Accepted	Same as comments No 29, 33 and 34.
80	Rolls-Royce plc	4.1.4.a.2 (a)	9	The phrase '...or susceptible to reversal in operations' is not understood.	Clarification/rewording requested.	No	Yes	Accepted	Refer to comment No 67.
81	Rolls-Royce plc	4.1.4.b	9	The point is not consistent with 4.1.2.b. Also if the SB describes what has to be done adequately this is unnecessary as the safety intent and configuration description will just be included in the raising AD.		Yes	No	Not Accepted	The CM describes DAH best practice, which is not mandatory.
82	Rolls-Royce plc	4.1.4.a.2 (c)	9	When the subject of the SB/AD is the life of life-limited parts, replacement with the same part number must remain an option. The subject must not/cannot be dealt with via 'modification level'. Therefore, the proposal should exclude this situation or be completely re-written.		No	Yes	Not Accepted	Paragraph 4.1.4.a.2 refers to cases where the configuration is changed. The example mentioned (life-limited parts) does not require a configuration change.

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83	Rolls-Royce plc	4.1.5.a Table 1 (Example 1)	10	In the second column, the word 'cold' is unnecessary. Should be deleted.		No	Yes	Accepted	Refer to comment No 68.
84	Rolls-Royce plc	4.1.5.b	10	The word 'tolerances' is not understood. Suggest deletion.		No	Yes	Accepted	Refer to comment No 69.
85	Rolls-Royce plc	4.1.6.a	10	To be consistent with the terminology earlier in the paragraph, suggest that the term 'critical step' is replaced by the phrase 'specific requirement' or 'specific instruction'.		No	Yes	Accepted	Refer to comment No 70.
86	Rolls-Royce plc	4.1.8	11	The term 'Flow Chart' is better understood than 'Logic-Based Diagram'. Suggest this latter term is removed throughout the document.		Yes	No	Partially Accepted	Refer to comment No 71.
87	Rolls-Royce plc	4.1.8	11	To clarify the intent and remove unnecessary text, suggest that paragraph is amended.	'...is a useful tool to assist owners/operators in choosing identifying the best intended corrective path, such as repetitive inspections or a terminating modification, based on the discovered condition and compliance times.'	No	Yes	Accepted	Refer to comment No 72.
88	Rolls-Royce plc	4.1.8.b	11	If a logic based diagram is the clearest way of describing what has to be done, why cant it be the primary source for tasks or compliance times in the SB?		Yes	No	Not Accepted	Refer to comment No 52.
89	Rolls-Royce plc	4.3.6 Figure 2	16	The example is not particularly helpful and appears incomplete. By the way, this is the first figure (not the second).				Noted	Refer to comment No 43.
90	Rolls-Royce plc	4.3.6	16	SB to AD Referencing (1) The updating of maintenance manuals (MM) cannot realistically be expected on every occasion that an AD is issued. As a consequence, such a cross-reference list will be of limited value, could be confusing to operators and might lead to non-application of the most recent ADs. (2) The cross-reference list would be of little interest to non-European operators who would be required to comply with their own states ADs. (3) As defined earlier in the CM, changes to other documents is outside the defined scope of the CM.	EASA are requested to reconsider the need for this paragraph (4.3.6)	No	Yes	Not Accepted	Refer to comment No 74.
91	Rolls-Royce plc	Annex II para 5.	18	".....fastener head or not nut to"		Yes	No	Accepted	Refer to comment No 75.

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92	Eurocopter	3	6	<p><i>"only the Agency may issue ... mandatory information ..."</i></p> <p><i>Service Bulletins ... issued by design approval holders in accordance do not have a legally mandatory character ...</i></p> <p><i>In this respect, any misleading wording in the title, the header or any other prominent part of the document should be avoided when issuing Service Bulletins.</i></p> <p><i>Only Service Bulletins related to ADs should be labelled "mandatory" by the design approval holder."</i></p> <p>The last sentence cited above looks at first glance conflicting with the previous ones.</p> <p>Nevertheless, we understand that a design approval holder might issue a SB with mention "mandatory" <u>if and only if</u> this SB is linked to an unsafe condition and will lead to an AD, even before the AD is issued.</p>	<p>The case where "mandatory" is accepted should be made more explicit.</p> <ul style="list-style-type: none"> - "Mandatory" application is stated in the SB before AD dispatch, based on the event classification (unsafe event where an AD is normally issued), - The SB with mandatory application is issued prior to AD and addresses the unsafe condition described <u>in the SB</u>. 	No	Yes	Not Accepted	Refer to comment No 48.
93	Eurocopter	4.1.3. b.	8	<p><i>"The accomplishment instructions in a SB should address resolving the unsafe condition identified in the AD"</i></p> <p>It is obvious that an SB linked to an AD shall address resolving the unsafe condition identified in this AD. However, because the SB is normally written before the AD, this sentence may be misleading.</p>	<p>Remove this sentence or make it more clear.</p> <p>Possible wording: <i>"The accomplishment instructions in a SB should address resolving the unsafe condition identified in the SB"</i>.</p>	No	Yes	Partially Accepted	<p>Sometimes SB do not clearly identify the unsafe condition.</p> <p>The text as been amended as follows: <i>"The accomplishment instructions in a SB should address resolving the unsafe condition identified in the SB and in the AD"</i>.</p>
94	Eurocopter	4.1.3. b.(2)(c)	8	<p><i>"A SB should specify only the testing necessary to ensure the new or modified system operates as intended after the modification is complete. Any additional functional tests that may be necessary due to an interruption to other aeroplane systems can be addressed in a note in the SB (see appendix A, paragraph 5)."</i></p> <p>Our position is that a SB should list all tests linked to the application of the instruction contained in the SB (e.g. if necessary to remove and reinstall an electrical master box to re-route wires, the test used to ensure that the EMB operates normally should be included). This does not preclude reference to an existing document for the specification of such test.</p> <p>Also notice a mistake in wording "see appendix A, paragraph 5".</p>	<p><i>"A SB should specify only the testing necessary to ensure the new or modified system operates as intended after the modification is complete. Any additional functional tests that may be necessary due to an interruption to other aeroplane systems should be listed by reference to existing documents or addressed in a general note in the SB (see Annex I, example 5)."</i></p>	No	Yes	Accepted	The text has been changed accordingly.

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95	Eurocopter	4.1.4. a., 4.1.4. a.(1), 4.1.4. a.(2)	8, 9	<p>"When drafting a SB that might be made mandatory by an AD, the SB should contain paragraphs entitled "Safety Intent", or similar, and for ADs that will change the configuration of a part, "Configuration Description." Place the paragraphs next to one another upfront in the SB, for example after the "Reason" paragraph."</p> <p>Such titles ("Safety Intent" and "Configuration Description") are not in accordance with ATA Spec 2200. We should include such information respectively in sections "Reason" and "Description".</p>	<p>In section 4.1.4. a.:</p> <ul style="list-style-type: none"> - "When drafting a SB that might be made mandatory by an AD, the SB should contain a description of the safety intent (in section "Reason" and, for ADs that will change the configuration of a part, a description of the configuration change (in section "Description")." - and remove "Place the paragraphs next to one another upfront in the SB, for example after the "Reason" paragraph." <p>In section 4.1.4. a.(1), replace "The "Safety Intent" paragraph" by "The safety intent description"</p> <p>In section 4.1.4. a.(2), replace "a "Configuration Description" paragraph should be included" by "a configuration description should be included in section "Description"."</p>	No	Yes	Not Accepted	It is clearly stated in paragraph 4.1.4. a. that "the "Safety Intent" may be part of the "Reason" paragraph".
96	Eurocopter	4.1.4. a.(2)(d)	9	<p>"An affected component "part number" may contain, both "good" and "bad" parts ..."</p> <p>Sentence is not understood, especially the concepts of "good" and "bad" parts.</p>	<p>Suggestion is to:</p> <ul style="list-style-type: none"> - correct the wording: e.g. respectively "old part" (or "defective part" or "inadequate part" or) and "new part" (or "replacement part" or "substitution part"), - clarify the concept (we do not see any good reason not to designate both old part and new part by their part numbers). 	Yes	No	Partially Accepted	The text has been amended as follows: "An affected component "part number" may contain both defective and non-defective parts, sub-assemblies, or assemblies."
97	Eurocopter	4.1.6. e.	11	<p>"Notes should be placed at the beginning of the accomplishment instructions ..."</p> <p>This statement looks too much prescriptive. In some cases, there could be an interest to place notes in the body of the accomplishment instructions paragraph, close to the subject to which they refer.</p>	<p>Please explain why having all notes at the beginning is preferred than having it at the place where it makes sense in the procedure?</p>	Yes	No	Partially Accepted	The text has been amended as follows: "Notes should be preferably placed at the beginning of the accomplishment instructions ...".
98	Eurocopter	4.1.9.	12, 13	<p>"... the DAH's procedure or document may be used, but an operator's procedure accepted by the competent authority could also be used"</p> <p>By principle, we never rely on procedures defined by operators, which could raise legal issues. Accordingly, we use the wording "in accordance with", not "refer to".</p> <p>At least, it should be clear, in the note suggested in 4.1.9. c., that alternative operator defined procedures shall be approved by the competent authority.</p>	<p>Should the principle of alternative operator defined procedures be kept, we suggest amending the note suggested in 4.1.9. c. the following way (see underlined text):</p> <p>"When the words "refer to" are used and the operator has other acceptable methods, techniques, and practices (including tools, equipment, and test equipment) those acceptable methods, techniques, practices (including tools, equipment, and test equipment) may be used to complete the work, <u>provided they are approved by the competent authority</u>".</p>	No	Yes	Accepted	The text was amended as follows: When the words "refer to" are used and the operator has other methods, techniques, and practices (including tools, equipment, and test equipment) approved by the competent authority, those acceptable methods, techniques, practices (including tools, equipment, and test equipment) may be used to complete the work."

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99	Eurocopter	4.1	/	<p>This certification memorandum seems to be in line with the FAA "SB-AD friendly" initiative. In this way, EASA AD section has presented to Eurocopter during continued airworthiness workshop what they expect from industries as contents of SB. Between this presentation and the draft certification memorandum, there is a discrepancy regarding the use of "logic based diagram".</p> <p>They were likely to be proscribed in the presentation in favour of tables as used in EASA AD and they are presented as potentially helpful in the CM (page11 §4.1.8).</p> <p>A clarification has been asked to AD section on this point as it would influence SB writing.</p> <p>The answer from D Cojocar is to say that in the cert memo logic based diagram shall not be source of info</p>	In this way Industry suggestion would be to officially promote also tables to detail applicability of industry SB within the certification memorandum, in line with EASA recommendation.	Yes	No	Noted	<p>The comment is acknowledged by the Agency but no change to the existing text is considered necessary.</p> <p>The use of logic-based diagrams (flow charts) in SBs is acceptable, provided that they are only used to assist owners/operators in choosing the best corrective path.</p>
100	Eurocopter	4.3.2. b. (4)	15	<p>"Internal flags should then be placed in the associated maintenance document where the requirement is located to indicate that it addresses an AD compliance requirement"</p> <p>Please notice that there is an on-going project at Eurocopter on this subject.</p> <p>Besides flagging the requirement as linked to an AD, another objective is also to be able to replace an AD and associated SB by the instruction in the mandatory part of the AMM.</p>		Yes	No	Noted	The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
101	Eurocopter	4.3.4.	16	This section is redundant with 4.1.3. b.(2)	Suggestion is to suppress 4.3.4.	Yes	No	Accepted	Refer to comment No 41.
102	Eurocopter	Annex I	17	Statements like the ones in example notes 2 and 3, giving freedom to the operator on alternate procedures, materials or parts, is typically considered as potentially risky.		Yes	No	Not Accepted	Comment is not agreed.
103	Eurocopter	Annex IV	23	The example of logic based diagram given in Annex IV is <u>not</u> based on standardized flowchart symbols.	Suggestion is to elaborate the example flowchart using standardized symbols (especially decision points based on diamond shape).	Yes	No	Accepted	Another flow chart has been added.
104	Piaggio Aero Industries	Section 2 (and relevant note 1)	6/24	Several types of documents are used to provide operators with information or to request actions. Each DAH has its own standard, so the same general type of doc (e.g., Service Letter) is used from DAH A to provide approved data, and from DAH B to provide not-approved data. This may create confusion	Defining a guideline on content expected within various documents issued by DAH			Noted	
105	Piaggio Aero Industries	Section 4.1.10, item (7)	13/24	Availability of not yet approved data (such as proposed solution to an unsafe condition) could create confusion in operators, or may create temptation to accomplish in advance an instruction	<p>Clarify that the information exchange process should be restricted to those parties that are fully aware that the information provided can not be used until approved (e.g., publishing information on a website restricted area).</p> <p>The published information should be clearly identified as not-approved and only for review (using watermarks)</p>			Not Accepted	The current text is clear enough, referring to "proposed solutions, proposed compliance times" etc.

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106	<i>Piaggio Aero Industries</i>	Section 3	6/24	<p>An AD is related to an unsafe condition. Allowing labelling “mandatory” only those SB related to AD implies that only SB related to unsafe conditions may be labelled “mandatory”. There may be situation where the DAH need to positively declare that an action is required (such as, restoring of a configuration conformant to design, following identification of an issue in production line, or following an error identified in the AMM procedures) even if it is not related to a safety issue. Labelling this instruction as “recommended” could not be strong enough to make clear to operators the need to accomplish an instruction.</p> <p>If, within the SB, it is clearly stated that only the Agency may bind operators to comply with a SB, labelling a SB “mandatory” also when not related to an AD could be acceptable.</p> <p>The Agency should be anyway preliminary informed about any Mandatory SB, AD related or not, before its issuance and its possible revision.</p>	Allow labelling “mandatory” a SB even if not related to an AD, provided the Agency is aware in advance of its issuance, and that the SB itself clarify that only the Agency can bind operators to accomplish to an instruction.			Not Accepted	One of the main purposes of this CM is to make clear that only EASA may issue mandatory information in the context of article 20.1 of Regulation (EC) No 216/2008 and that, therefore, DAH should avoid nay misleading wording accordingly, especially when the SB is not related to an AD with similar content.
107	<i>Europe Air Sports</i>	3	6	Europe Air Sports (“EAS”) fully supports the text which clarifies that only ADs are mandatory, and that SBs which are other than those directly linked to an AD are not mandatory. In the 2012 Part M task group this subject was discussed extensively, and clarification sought so as to reduce the considerable ‘gold plating’ interpretation of some NAAs in relation to Part M where non mandatory actions have been treated as mandatory.		Yes - Observation	Yes - substantive	Noted	
108	<i>Europe Air Sports</i>	3	6	In the Part M task group we also touched on other mandatory items, such as ALIs (Airframe Life Limits). I assume that these are outside the scope of this memorandum, as they are not the subject of SBs.	Suggest clarify the scope of the memorandum by reference to other forms of mandatory compliance other than ADs.	Yes - Suggestion	Yes - substantive	Not Accepted	The scope of the CM is extensively clarified in the existing text.
109	<i>Europe Air Sports</i>	4	7 to 24	EAS has not comments on section 4 but supports the proposed texts	N/A	Yes - Observation	Yes - substantive	Noted	

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Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
110	AgustaWestland	3	6	<p><i>"only the Agency may issue ... mandatory information ...</i></p> <p><i>Service Bulletins ... issued by design approval holders in accordance do not have a legally mandatory character ...</i></p> <p><i>In this respect, any misleading wording in the title, the header or any other prominent part of the document should be avoided when issuing Service Bulletins.</i></p> <p><i>Only Service Bulletins related to ADs should be labelled "mandatory" by the design approval holder."</i></p> <p>We understand that all the SBs related to ADs ("mandatory") have to be discussed and agreed with the Agency prior their issue.</p> <p>This is due to the fact that only the Agency may decide whether to endorse the SB with an AD.</p> <p>If adopted, this concept may lead to:</p> <p>a) <u>Issuance of DHA SBs towards operators without the label "mandatory" even if safety related.</u></p> <p>b) Issuance of DHA SBs towards the Agency in draft copy for evaluation after which the agency will decide whether to release the SBs as part of an AD or not. After the evaluation the Agency will communicate to the DHA to release the SB with label mandatory or not</p> <p>c) DHA will not issue any "Mandatory" SBs to Operators but will provide to the Agency all the necessary information for ADs issuance. If the Agency does not deem to issue an AD the DHA is free to release the SB in a proper way.</p>	<p>Since none of the three cases a); b); c) appears satisfactory, the AW suggestion is that DHA will continue to issue towards the Operators SBs labelled "mandatory" in case of unsafe conditions.</p> <p>In parallel the DHA will provide to the Agency the necessary information. The Agency to decide whether to endorse the SBs with an AD according to part 21.A3B</p>	No	Yes	Not Accepted	<p>Refer to comment No 106.</p> <p>Cases of disagreement between the DAH and the competent authority, where the DAH considers a condition to be unsafe and the competent authority does not, are possible, but not likely.</p>
111	AgustaWestland	4.1.2 (2)	7	<p><i>There can be cases in which the SB will not lead to a configuration change; for example the unsafe condition may be remove with introduction of a dedicated inspection or new procedure.</i></p>	<p>Modify the statement as follows: " of the new configuration, inspection, procedure...."</p>	Yes	No	Not Accepted	The existing text is clear.
112	AgustaWestland	4.1.3. b.	8	<p><i>"The accomplishment instructions in a SB should address resolving the unsafe condition identified in the AD"</i></p> <p>This is in principle not applicable because the SBs is normally released before the ADs.</p>	Delete the Statement	No	Yes	Partially Accepted	Refer to comment No 93.

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113	AgustaWestland	4.1.3. b.(2)(c)	8	<p>"A SB should specify only the testing necessary to ensure the new or modified system operates as intended after the modification is complete.</p> <p>Any additional functional tests that may be necessary due to an interruption to other aeroplane systems can be addressed in a note in the SB (see appendix A, paragraph 5)."</p> <p>DHA retains that the SBs shall contain all the necessary information to test both new or modified systems as well any other system involved by the SB</p>	"A SB should specify only the testing necessary to ensure the new or modified system operates as intended after the modification is complete. Any functional tests that may be necessary due to an interruption to other aircraft systems should be listed / mentioned in the SB"	No	Yes	Accepted	The text has been changed accordingly.
114	AgustaWestland	4.1.4. a.(2)(a),	9	<p>(a) Be limited to the features that will prevent development or recurrence of the unsafe condition, once the configuration has been implemented. The paragraph can provide the greatest value in SBs that specify 'high risk' modifications (e.g., instructions that are complex, workmanship intensive, or susceptible to reversal in operations).The statement is not clear</p>	Please provide clarification on what , " or susceptible to reversal in operations)" means.	Yes	No	Accepted	Refer to comment No 67.
115	AgustaWestland	4.1.4.a.(2)(c)	9	<p>(c) For an AD that will require installation of a different part, the part number of the new part should differ from that of the original. If changing the part number (i.e., "rolling" the part number) is impractical, identify the "modification level" of the part. The configuration description for this case should control the part by the "modification level" in addition to the part number identification.</p> <p>Specify if the change of dash number can be considered a change of P/N.</p> <p>Evaluate the usage of "suffix" e.g FM "Field Modified" for the parts that can be modified by he Operators</p>	Please provide clarifications	Yes	No	Not Accepted	A different dash number means a different part number.
116	AgustaWestland	4.1.4. a.(2)(d)	9	<p>"An affected component "part number" may contain, both "good" and "bad" parts ..."</p> <p>Statement is not clear</p>	Please specify the meaning of "good" and "bad" parts.	Yes	No	Accepted	Refer to comment No 96.
117	AgustaWestland	4.1.9	12	<p>(1) A process or procedure that must be followed exactly to resolve the unsafe condition and comply with the AD. Also consider including the steps of the process or procedure in the SB</p> <p>This paragraph appears in conflict with paragraph 4.1.3.b (2) in which is stated not to duplicate procedures reported in other documents.</p>	Please clarify	No	Yes	Not Accepted	Here it is mentioned to include only the steps , not the whole process or procedure.

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118	AgustaWestland	4.1.10 c (7)	13	<p><i>(7) Information Exchange Process – A process in which a DAH shares information used to develop service information. For example, posting the proposed solutions, proposed compliance times, estimated parts availability dates, and other information regarding plans for resolving an unsafe condition on the DAH website.</i></p> <p><i>Designated parties can then view the information and provide feedback back to the DAH</i></p> <p>AW does not concur with the posting of proposed compliance times as they can be determined by analysis testing etc and may not be discussed by the Operator.</p> <p>Only in the case that the compliance times are derived from service experience an advice of operators may be considered.</p>	Please specify better the policy and the parties Involved	No	Yes	Not Accepted	Refer also to comment No 105.
119	AgustaWestland	4.3.2. b. (4)	15	<p><i>"Internal flags should then be placed in the associated maintenance document where the requirement is located to indicate that it addresses an AD compliance requirement"</i></p> <p>We do not consider these requirements a plus as the full list of SBs /ADs is reported in the manual.</p> <p>We retain the statement above particularly useful when the SBs / ADs affect the retirement lives or Inspection requirements.</p>	Evaluate the possibility to flag only SBs or ADs related to retirement lives and inspection requirements	No	Yes	Not Accepted	The suggestion in the CM must be valid for all SBs made mandatory by ADs. Refer also to comment No 74.