



May 12, 2022

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: FAA–2022–0296; Project Identifier MCAI–2021–01064–E
Airworthiness Directives; Rolls-Royce Deutschland Ltd & Co KG (Type Certificate Previously Held by Rolls- Royce plc) Turbofan Engines

IN SUPPORT

Dear Sir or Madam:

The Air Line Pilots Association (ALPA), representing the safety interests of more than 62,000 professional airline pilots flying for 38 airlines in the United States and Canada, has reviewed the subject document.

The FAA proposes to supersede Airworthiness Directive (AD) 2021-15-01, which applies to all Rolls-Royce Deutschland Ltd & Co KG (RRD) Trent XWB-75, Trent XWB-79, Trent XWB-79B, Trent XWB-84, and Trent XWB-97 model turbofan engines. AD 2021-15-01 requires revisions to the airworthiness limitations section (ALS) of the Rolls-Royce (RR) Trent XWB time limits manual (TLM) and the operator's existing approved aircraft maintenance program (AMP). Since the FAA issued AD 2021-15-01, the manufacturer has revised the TLM life limits and updated mandatory inspection intervals of certain critical rotating parts. This proposed AD would require revisions to the ALS of the RR Trent XWB TLM and the operator's existing approved AMP, as specified in a European Union Aviation Safety Agency (EASA) AD, which is proposed for incorporation by reference (IBR). ALPA supports the subject AD.

ALPA appreciates the opportunity to comment.

Sincerely,

Chris Heck
Senior Staff Engineer
Engineering & Air Safety Department

CH: dm