

## EASA

## Comment Response Tool

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<b>Title</b>	Non-binding guidance on TBO limits
<b>NPA Number</b>	NPA 2011-15

**UK CAA** (European.Affairs@caa.co.uk) has placed **3** unique comments on this NPA:

<b>Cmt</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachment</b>
93	(General Comments)	0	<p><b>Page No:</b> General</p> <p><b>Paragraph No:</b> General</p> <p><b>Comment:</b> It is not clear whether this proposal covers those engines which have a recommended replacement life as well as a recommended TBO period.</p> <p>EASA should consider adopting a list of engines that do not qualify for inclusion in this extension programme.</p> <p><b>Justification:</b> Some engine types do not have OEM recommended overhaul periods and have a replacement life specified instead. It is proposed that this guidance would not cover such engines. Also, it is considered that some engine types have yet to accumulate sufficient service experience to demonstrate acceptable reliability when operating beyond the manufacturer's recommended overhaul period and adoption of such a list would allow EASA to control the extension of new types as they are introduced until sufficient experience is gained.</p>	
94	(General Comments)	0	<p><b>Page No:</b> General</p> <p><b>Paragraph No:</b> General</p> <p><b>Comment:</b> Reference is made to the TBO extension of component which could be interpreted as components such as engine magnetos and propellers. Taken literally these could be extended indefinitely on privately operated aircraft which is outside our experience. The UK CAA does not have a policy to indefinitely extend all components and would propose that NPA 2011-15 addresses primarily piston engine TBOs. In particular, the proposal would permit items such as variable pitch propellers on privately operated aircraft to operate indefinitely, without any explicit inspections of bare blades and hubs. The UK CAA currently has a Generic Requirement (No.17) in publication CAP 747 regarding maintenance requirements for variable pitch propellers.</p> <p><b>Justification:</b> Industry experience of propeller overhaul periods.</p> <p><b>Proposed Text:</b> Amend to make reference to engine TBO periods only. The EASA might consider introducing similar maintenance requirements for variable pitch propellers for</p>	

Cmt	Segment description	Pag	Comment	Attachm
95	B. Draft Decision - AMC#2 M.A.302 (d) — Time Between Overhauls	9 - 10	<p>which the manufacturer has not published overhaul lives in terms of hours or calendar period in order to ensure that all propeller types are maintained to an acceptable airworthy standard.</p> <p><b>Page No:</b> 10</p> <p><b>Paragraph No:</b> AMC#2 M.A.302(d) Time Between Overhauls</p> <p><b>Comment:</b> Paragraph 3, Additional Considerations states:</p> <p><i>“TBO extensions in accordance with this AMC#2 should not be considered for components installed in aircraft used in commercial air transport or training activities, for components linked to IFR operations and for components for which their normal serviceable condition could be affected because of the aircraft’s utilisation/typical environment (e.g. engine on an aircraft used for towing or aerobatic flights or components affected by the operation of the aircraft in highly corrosive environment).”</i></p> <p>The draft AMC permits 2 or more maximum 20% of OEM TBO life extensions permitted on private category aircraft only. Para 3 under additional considerations does not allow any extensions for piston engined aircraft &lt;2730 kg involved in commercial air transport, training, glider towing or aerial work. For this category of aircraft it is proposed that TBO extensions be permitted but limited to a maximum of 1 x 20% of the OEM recommended TBO life extension.</p> <p><b>Justification:</b> There has been satisfactory UK industry experience of this period of extension permitted for this category of aircraft over several decades. Also, adoption of the NPA proposals would immediately mean non-compliance for certain aircraft categories in the UK.</p>	