

## Document Review Comment Log

<b>Title of Document:</b> AC 33.90-1A, Initial Maintenance Inspection (IMI), 14 CFR § 33.90, Test for Turbine Engines	
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<b>Comments Disposition Date:</b>	May 8, 2015

<b>Commenter:</b> • Complete Reviewing Office information and your Comments.
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<b>Reviewing Office</b>	
<b>Organization:</b>	GE Aviation
<b>Comments Sent By:</b>	Peter G. Thompson
<b>Phone:</b>	

#	Name and Mail Stop	Page and Paragraph Number	Comment	Reason for Comment	Recommendation	Disposition/Response to Comment
1	--	7. IMI Tests. a. IMI Test Cycle Assessment.  (Now 2.1.1)	Change paragraph to allow including (if available) comparison of relevant past IMI demonstrations to successful entry-into-service engine experience, when substantiating an accelerated severity cycle test.	The commenter believes development and justification of any proposed IMI test cycle could be enhanced if/when the applicant can provide direct and appropriate correlation of past executed IMI test cycle(s) to subsequent, successful EIS engine experience.	Change paragraph to read, ""The accelerated severity cycle test is generally not considered ideal for showing compliance of those engine parts whose durability is primarily affected by hours of operation rather than by cycles. For those cases, other test or service experience data, <i>including (if available) comparison of relevant past IMI demonstrations to successful entry-into-service engine experience</i> , may be required to substantiate the IMI intervals when using this test method. The accelerated severity cycle test should include engine start and shutdown."	Accept. Changed paragraph as proposed.

**Author:**

Disposition the comments in the last column. Identify each disposition as:

- Agree;
- Partially Agree;
- Do Not Agree; or
- Outside of Scope (will consider in next change/revision).

**Note:** Provide enough explanation or justification to your comment disposition.

Substantive comments must be resolved and do not include the following unless they change the intent:

- correct grammar or sentence structure;
- correct term use
- simple text changes that clarify the intent, meaning, or to improve readability
- change in format/structure of the overall document

**Note:** Please forward editorial comments to the Tech Writer for resolution.

**Commenter:**

- Complete Reviewing Office information and your Comments.

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#	Name and Mail Stop	Page and Paragraph Number	Comment	Reason for Comment	Recommendation	Disposition/Response to Comment
2	--	7. IMI Tests.  e. Pass/Fail Criteria.  (Now para 2.1.5)	Change the paragraph requirement to allow other suitable and representative post-test engine inspection processes agreed to by the FAA, rather than full teardown immediately following the test, to determine the success of the test.	The commenter believes that providing guidance allowing for proposal and discussion of alternate post-test inspection processes would add potential, beneficial flexibility. Some applicants, particularly those with extensive, relevant IMI and field experience should be able to apply that experience in developing and proposing effective post-test inspection processes in lieu of a TDI.	Change the paragraph to read, "(2) Following the test, a teardown inspection, <i>or other suitable and representative post-test engine inspection process agreed to by the FAA</i> , should show that each engine part conforms to the type design and is eligible for continued operation in service per the ICA information submitted for compliance with § 33.4. Hardware may be found serviceable if appropriate inspections or limitations are included within the ICA."	Disagree. The regulation already allows alternate inspection methods, providing the engine test continues for a substantial number of cycles following the inspection (that is, as part of the §33.201 Early ETOPS cyclic endurance test). Past experience does not always apply to new center-line engine designs. Currently, without examining each part it is not feasible to determine whether each part complies with the ICA (or if ICA changes are necessary to ensure the safe operation of the engine between overhaul periods).
3	--	N/A	N/A	N/A	N/A	Comment withdrawn by commenter.