

**(h) Required Actions**

If, during any inspection or records review required by paragraph (g) of this AD, any ISS OPS P/N COL40-0010-0100 or COL46-0007-0100 is found: Within 12 months after the effective date of this AD, do all applicable actions identified as "RC" (required for compliance) in, and in accordance with, the Accomplishment Instructions of Boeing Alert Service Bulletin B787-81205-SB340036-00, Issue 001, dated June 30, 2017; except where Boeing Alert Service Bulletin B787-81205-SB340036-00, Issue 001, dated June 30, 2017, specifies installing software P/Ns COL41-0010-0101 and COL44-0007-0102, this AD requires installing P/Ns COL41-0010-0101 and COL44-0007-0102, or later-approved software versions. Later-approved software versions are only those Boeing software versions that are approved as a replacement for the applicable software, and are approved as part of the type design by the FAA or the Boeing Commercial Airplanes Organization Designation Authorization (ODA) after issuance of Boeing Alert Service Bulletin B787-81205-SB340036-00, Issue 001, dated June 30, 2017.

**(i) Additional Actions for Group 1 Airplanes**

For Group 1 airplanes identified in Boeing Alert Service Bulletin B787-81205-SB340036-00, Issue 001, dated June 30, 2017: Prior to accomplishment of the actions required by paragraph (h) of this AD, install new software for the ISS OPS, ISS option selection software (OSS) file, and ISS airline selectable option (ASO) file; and install a new ISS definition file database within the displays and crew alerting (DCA) system; in accordance with the Accomplishment Instructions of Boeing Service Bulletin B787-81205-SB340005-00, Issue 002, dated April 27, 2016; except where Boeing Service Bulletin B787-81205-SB340005-00, Issue 002, dated April 27, 2016, specifies installing certain software, this AD requires installing that software or later-approved software versions. Later-approved software versions are only those Boeing software versions that are approved as a replacement for the applicable software, and are approved as part of the type design by the FAA or the Boeing Commercial Airplanes ODA after issuance of Boeing Service Bulletin B787-81205-SB340005-00, Issue 002, dated April 27, 2016.

**(j) Parts Installation Prohibition**

As of the effective date of this AD, no person may install ISS OPS part number COL40-0010-0100 or COL46-0007-0100 on any airplane, except in accomplishment of the actions required by paragraph (i) of this AD.

**(k) Credit for Previous Actions**

This paragraph provides credit for the actions specified in paragraph (i) of this AD, if those actions were performed before the effective date of this AD using Boeing Service Bulletin B787-81205-SB340005-00, Issue 001, dated December 11, 2015.

**(l) Alternative Methods of Compliance (AMOCs)**

(1) The Manager, Seattle ACO Branch, FAA, has the authority to approve AMOCs

for this AD, if requested using the procedures found in 14 CFR 39.19. In accordance with 14 CFR 39.19, send your request to your principal inspector or local Flight Standards District Office, as appropriate. If sending information directly to the manager of the certification office, send it to the attention of the person identified in paragraph (m)(1) of this AD. Information may be emailed to: [9-ANM-Seattle-ACO-AMOC-Requests@faa.gov](mailto:9-ANM-Seattle-ACO-AMOC-Requests@faa.gov).

(2) Before using any approved AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local flight standards district office/certificate holding district office.

(3) An AMOC that provides an acceptable level of safety may be used for any repair, modification, or alteration required by this AD if it is approved by the Boeing Commercial Airplanes ODA that has been authorized by the Manager, Seattle ACO Branch, to make those findings. To be approved, the repair method, modification deviation, or alteration deviation must meet the certification basis of the airplane, and the approval must specifically refer to this AD.

(4) For service information that contains steps that are labeled as RC, the provisions of paragraphs (l)(4)(i) and (l)(4)(ii) of this AD apply.

(i) The steps labeled as RC, including substeps under an RC step and any figures identified in an RC step, must be done to comply with the AD. If a step or substep is labeled "RC Exempt," then the RC requirement is removed from that step or substep. An AMOC is required for any deviations to RC steps, including substeps and identified figures.

(ii) Steps not labeled as RC may be deviated from using accepted methods in accordance with the operator's maintenance or inspection program without obtaining approval of an AMOC, provided the RC steps, including substeps and identified figures, can still be done as specified, and the airplane can be put back in an airworthy condition.

**(m) Related Information**

(1) For more information about this AD, contact Nelson O. Sanchez, Aerospace Engineer, Systems and Equipment Section, FAA, Seattle ACO Branch, 2200 South 216th St., Des Moines, WA 98198; phone and fax: 206-231-3543; email: [nelson.sanchez@faa.gov](mailto:nelson.sanchez@faa.gov).

(2) Service information identified in this AD that is not incorporated by reference is available at the addresses specified in paragraphs (n)(3) and (n)(4) of this AD.

**(n) Material Incorporated by Reference**

(1) The Director of the Federal Register approved the incorporation by reference (IBR) of the service information listed in this paragraph under 5 U.S.C. 552(a) and 1 CFR part 51.

(2) You must use this service information as applicable to do the actions required by this AD, unless the AD specifies otherwise.

(i) Boeing Alert Service Bulletin B787-81205-SB340036-00, Issue 001, dated June 30, 2017.

(ii) Boeing Service Bulletin B787-81205-SB340005-00, Issue 002, dated April 27, 2016.

(3) For service information identified in this AD, contact Boeing Commercial Airplanes, Attention: Contractual & Data Services (C&DS), 2600 Westminister Blvd., MC 110-SK57, Seal Beach, CA 90740-5600; telephone 562-797-1717; internet <https://www.myboeingfleet.com>.

(4) You may view this service information at the FAA, Transport Standards Branch, 2200 South 216th St., Des Moines, WA. For information on the availability of this material at the FAA, call 206-231-3195.

(5) You may view this service information that is incorporated by reference at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, call 202-741-6030, or go to: <http://www.archives.gov/federal-register/cfr/ibr-locations.html>.

Issued in Des Moines, Washington, on October 22, 2018.

**Michael Kaszycki,**

*Acting Director, System Oversight Division, Aircraft Certification Service.*

[FR Doc. 2018-23690 Filed 11-2-18; 8:45 am]

**BILLING CODE 4910-13-P**

**DEPARTMENT OF TRANSPORTATION****Federal Aviation Administration****14 CFR Part 39**

**[Docket No. FAA-2018-0216; Product Identifier 1988-ANE-18-AD; Amendment 39-19474; AD 2018-22-01]**

**RIN 2120-AA64****Airworthiness Directives; Honeywell International Inc. Turboprop Engines**

**AGENCY:** Federal Aviation Administration (FAA), DOT.

**ACTION:** Final rule.

**SUMMARY:** We are superseding Airworthiness Directive (AD) 88-12-10 for certain Honeywell International Inc. (Honeywell) TPE331 turboprop engines. AD 88-12-10 required reducing the life limit for certain second stage turbine rotors. This AD requires removing certain second stage turbine rotors from service at a reduced life limit. This AD was prompted by report that a TPE331-11U engine experienced an uncontained rotor separation. In addition, cracks were discovered through eddy current inspection (ECI) in the bore of the second stage turbine rotor assembly after publication of AD 88-12-10. We are issuing this AD to address the unsafe condition on these products.

**DATES:** This AD is effective December 10, 2018.

**ADDRESSES:** For service information identified in this final rule, contact Honeywell International Inc., 111 S 34th Street, Phoenix, AZ 85034-2802; phone:

800-601-3099; internet: <https://myaerospace.honeywell.com/wps/portal>. You may view this service information at the FAA, Engine and Propeller Standards Branch, 1200 District Avenue, Burlington, MA 01803. For information on the availability of this material at the FAA, call 781-238-7759. It is also available on the internet at <http://www.regulations.gov> by searching for and locating Docket No. FAA-2018-0216.

**Examining the AD Docket**

You may examine the AD docket on the internet at <http://www.regulations.gov> by searching for and locating Docket No. FAA-2018-0216; or in person at Docket Operations between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays. The AD docket contains this final rule, the regulatory evaluation, any comments received, and other information. The address for Docket Operations (phone: 800-647-5527) is Document Operations, U.S. Department of Transportation, Docket Operations, M-30, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue SE, Washington, DC 20590.

**FOR FURTHER INFORMATION CONTACT:** Joseph Costa, Aerospace Engineer, Los Angeles ACO Branch, FAA, 3960 Paramount Blvd., Lakewood, CA 90712-4137; phone: 562-627-5246; fax: 562-627-5210; email: [joseph.costa@faa.gov](mailto:joseph.costa@faa.gov).

**SUPPLEMENTARY INFORMATION:**

**Discussion**

We issued a notice of proposed rulemaking (NPRM) to amend 14 CFR part 39 to supersede AD 88-12-10, Amendment 39-5910 (53 FR 19766, May 31, 1988), (“AD 88-12-10”). AD 88-12-10 applied to Honeywell TPE331-10, -10R, -10U, -10UA, -10UF, -10UG, -10UGR, -10UR, and -11U turboprop engines equipped with

2nd stage turbine rotors, part numbers 3102106-1, -6, and -8, installed. The NPRM published in the **Federal Register** on June 20, 2018 (83 FR 28550). The NPRM was prompted by a report that a TPE331-11U engine installed on an M7 Aerospace LP SA227 airplane experienced an uncontained rotor separation. In addition, cracks were discovered through ECI in the bore of the second stage turbine rotor assembly after publication of AD 88-12-10. The NPRM proposed to remove certain second stage turbine rotors from service at a reduced life limit. We are issuing this AD to address the unsafe condition on these products.

**Comments**

We gave the public the opportunity to participate in developing this AD. The following presents the comments received on the NPRM and the FAA’s response to each comment.

**Request To Revise Compliance Times**

Honeywell requested that we remove from the NPRM the statement that the FAA finds that allowing an additional 100 cycles-in-service before their removal provides a sufficient level of safety for applicable second stage turbine rotors that have been in service for 30 years after the publication of AD 88-12-10. Honeywell indicated it believes that most of the IN100 rotors have been replaced at around 3,500 cycles during hot section inspection. Honeywell noted that the rotors would not make it to the next hot section inspection with a life of 4,800 cycles. Honeywell noted that there is a not a lot of field experience for IN100 rotors beyond 3,500 cycles.

Honeywell commented that the removal schedule in the Honeywell service bulletin needs to remain the same (within 100 cycles-in-service for 3,301 to 4,000 cycles since new (CSN) rotors and within 50 cycles-in-service

for 4,001 to 4,800 CSN rotors) since the event rotor failed at around 4,100 cycles. Additionally, Honeywell has also found rotors through eddy current inspection that had long cracks at around 4,300 cycles.

We disagree. We would normally only require removal of parts within 50 cycles-in-service after the effective date of an AD when the risk justifies immediate action. The FAA assessed the risk of the affected rotors based on service experience and IN100 rotor propagation life of cracked and failed rotors. We found that the additional cycles in service allowed by this AD before the removal of the second stage turbine rotors provides an acceptable level of safety. We did not change this AD.

**Conclusion**

We reviewed the relevant data, considered the comment received, and determined that air safety and the public interest require adopting this AD as proposed.

**Related Service Information**

We reviewed Honeywell Service Bulletin (SB) TPE331-72-A2319, Revision 0, dated April 25, 2018, and TPE331-72-A2310, Revision 0, dated January 26, 2018. These SBs describe procedures for replacement of the second stage turbine rotor assembly installed on TPE331-8, -10, -10N, -10R, -10U, -10UA, -10UF, -10UG, -10UGR, -10UR, and -11U model engines.

**Costs of Compliance**

We estimate that this AD affects 100 engines installed on airplanes of U.S. registry.

We estimate that 20 commercial engines and 80 general aviation engines will need this turbine rotor replacement to comply with this AD:

**ESTIMATED COSTS**

Action	Labor cost	Parts cost	Cost per product	Cost on U.S. operators
Scheduled rotor replacement .....	1 work-hour × \$85 per hour = \$85 .....	\$7,500	\$7,585	\$379,250
Unscheduled rotor replacement .....	41 work-hours × \$85 per hour = \$3,485 .....	7,500	10,985	549,250

**Authority for This Rulemaking**

Title 49 of the United States Code specifies the FAA’s authority to issue rules on aviation safety. Subtitle I, Section 106, describes the authority of the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the Agency’s authority.

We are issuing this rulemaking under the authority described in Subtitle VII, Part A, Subpart III, Section 44701, “General requirements.” Under that section, Congress charges the FAA with promoting safe flight of civil aircraft in air commerce by prescribing regulations for practices, methods, and procedures the Administrator finds necessary for

safety in air commerce. This regulation is within the scope of that authority because it addresses an unsafe condition that is likely to exist or develop on products identified in this rulemaking action.

This AD is issued in accordance with authority delegated by the Executive Director, Aircraft Certification Service,

as authorized by FAA Order 8000.51C. In accordance with that order, issuance of ADs is normally a function of the Compliance and Airworthiness Division, but during this transition period, the Executive Director has delegated the authority to issue ADs applicable to engines, propellers, and associated appliances to the Manager, Engine and Propeller Standards Branch, Policy and Innovation Division.

**Regulatory Findings**

We have determined that this AD will not have federalism implications under Executive Order 13132. This AD will not have a substantial direct effect on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government.

For the reasons discussed above, I certify that this AD:

- (1) Is not a “significant regulatory action” under Executive Order 12866,
- (2) Is not a “significant rule” under DOT Regulatory Policies and Procedures (44 FR 11034, February 26, 1979),
- (3) Will not affect intrastate aviation in Alaska, and
- (4) Will not have a significant economic impact, positive or negative, on a substantial number of small entities under the criteria of the Regulatory Flexibility Act.

**List of Subjects in 14 CFR Part 39**

Air transportation, Aircraft, Aviation safety, Incorporation by reference, Safety.

**Adoption of the Amendment**

Accordingly, under the authority delegated to me by the Administrator, the FAA amends 14 CFR part 39 as follows:

**PART 39—AIRWORTHINESS DIRECTIVES**

- 1. The authority citation for part 39 continues to read as follows:

**Authority:** 49 U.S.C. 106(g), 40113, 44701.

**§ 39.13 [Amended]**

- 2. The FAA amends § 39.13 by removing Airworthiness Directive (AD) 88–12–10, Amendment 39–5910 (53 FR 19766, May 31, 1988), and adding the following new AD:

**2018–22–01 Honeywell International Inc. (Type Certificate previously held by AlliedSignal Inc., Garrett Engine Division; Garrett Turbine Engine Company; and AiResearch Manufacturing Company of Arizona):** Amendment 39–19474; Docket No. FAA–2018–0216; Product Identifier 1988–ANE–18–AD.

**(a) Effective Date**

This AD is effective December 10, 2018.

**(b) Affected ADs**

This AD replaces AD 88–12–10, Amendment 39–5910 (53 FR 19766, May 31, 1988).

**(c) Applicability**

This AD applies to Honeywell International Inc. (Honeywell) TPE331–8, –10, –10N, –10R, –10U, –10UA, –10UF, –10UG, –10UGR, –10UR, and –11U turboprop engines with second stage turbine rotor assemblies, part number (P/Ns) 3102106–1, –6, and –8 or P/N 3101514–1, –10 and –12, installed.

**(d) Subject**

Joint Aircraft System Component (JASC) Code 7250, Turbine Section.

**(e) Unsafe Condition**

This AD was prompted by a report that a TPE331–11U engine installed on an M7 Aerospace LP SA227 airplane experienced an uncontained rotor separation and the discovery of cracks in the bore of the second stage turbine rotor assembly after publication of AD 88–12–10. We are issuing this AD to prevent failure of the second stage turbine rotor. The unsafe condition, if not addressed, could result in uncontained release of the second stage turbine rotor, damage to the engine, and damage to the airplane.

**(f) Compliance**

Comply with this AD within the compliance times specified, unless already done.

**(g) Required Actions**

- (1) Remove from service the applicable second stage turbine rotor assembly, P/Ns 3102106–1, –6 and –8, according to the schedule in Table 1 to Paragraph (g)(1) of this AD:

**TABLE 1 TO PARAGRAPH (g)(1) OF THIS AD—REMOVAL OF SECOND STAGE ROTOR, P/NS 3102106–1, –6 AND –8**

Second stage turbine rotor cycles since new (CSN) on the effective date of the AD	Removal schedule
0 to 2,600 .....	Prior to 3,000 CSN.
2,601 to 3,300 .....	Within 400 cycles-in-service (CIS) after the effective date of this AD or 3,600 CSN, or at next access, whichever occurs first.
3,301 to 4,000 .....	Within 200 cycles-in-service after the effective date of this AD or 4,100 CSN, or at next access, whichever occurs first.
4,001 to 4,800 .....	Within 100 cycles-in-service after the effective date of this AD or 4,800 CSN, or at next access, whichever occurs first.

- (2) Remove from service the applicable second stage turbine rotor assembly, P/Ns 3101514–1, –10 and –12, per the schedule in Table 2 to Paragraph (g)(2) of this AD:

**TABLE 2 TO PARAGRAPH (g)(2) OF THIS AD—REMOVAL OF SECOND STAGE ROTORS, P/NS 3101514–1, –10 AND –12**

Second stage turbine rotor CSN on the effective date of the AD	Removal schedule
0 to 2,600 .....	Prior to 3,000 CSN.
2,601 to 3,200 .....	Within 400 CIS after the effective date of this AD or 3,600 CSN, or at next access, whichever occurs first.
3,201 to 3,800 .....	Within 200 CIS after the effective date of this AD or 4,100 CSN, or at next access, whichever occurs first.
3,801 to 4,400 .....	Within 100 CIS after the effective date of this AD or 4,400 CSN, or at next access, whichever occurs first.

**(h) Definition**

For the purpose of this AD, “next access” is defined as when the applicable second stage turbine rotor assembly is removed from the engine.

**(i) Installation Prohibition**

As of the effective date of this AD, do not install second stage turbine rotor assemblies, P/Ns 3102106-1, -6, and -8 and P/Ns 3101514-1, -10, and -12 on any engine.

**(j) Alternative Methods of Compliance (AMOCs)**

(1) The Manager, Los Angeles ACO, FAA, has the authority to approve AMOCs for this AD, if requested using the procedures found in 14 CFR 39.19. In accordance with 14 CFR 39.19, send your request to your principal inspector or local Flight Standards District Office, as appropriate. If sending information directly to the manager of the certification office, send it to the attention of the person identified in paragraph (k) of this AD. You may email your request to: [9-ANM-LAACO-AMOC-REQUESTS@faa.gov](mailto:9-ANM-LAACO-AMOC-REQUESTS@faa.gov).

(2) Before using any approved AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local flight standards district office/certificate holding district office.

**(k) Related Information**

For more information about this AD, contact Joseph Costa, Aerospace Engineer, Los Angeles ACO Branch, FAA, 3960 Paramount Blvd., Lakewood, CA 90712-4137; phone: 562-627-5246; fax: 562-627-5210; email: [joseph.costa@faa.gov](mailto:joseph.costa@faa.gov).

**(l) Material Incorporated by Reference**

None.

Issued in Burlington, Massachusetts, on October 23, 2018.

**Karen M. Grant,**

*Acting Manager, Engine and Propeller Standards Branch, Aircraft Certification Service.*

[FR Doc. 2018-23775 Filed 11-2-18; 8:45 am]

BILLING CODE 4910-13-P

**DEPARTMENT OF TRANSPORTATION****Federal Aviation Administration****14 CFR Part 39**

[Docket No. FAA-2018-0326; Product Identifier 2018-CE-006-AD; Amendment 39-19464; AD 2018-21-06]

RIN 2120-AA64

**Airworthiness Directives; SOCATA Airplanes**

**AGENCY:** Federal Aviation Administration (FAA), Department of Transportation (DOT).

**ACTION:** Final rule.

**SUMMARY:** We are superseding Airworthiness Directive (AD) 98-16-03 for SOCATA Model TB 9 and Model TB

10 airplanes. This AD results from mandatory continuing airworthiness information (MCAI) issued by an aviation authority of another country to identify and correct an unsafe condition on an aviation product. The MCAI describes the unsafe condition as fatigue cracking of the wing front attachments on the wing and fuselage sides. We are issuing this AD to require actions to address the unsafe condition on these products.

**DATES:** This AD is effective December 10, 2018.

The Director of the Federal Register approved the incorporation by reference of a certain publication listed in the AD as of December 10, 2018.

**ADDRESSES:** You may examine the AD docket on the internet at <http://www.regulations.gov> by searching for and locating Docket No. FAA-2018-0326; or in person at Docket Operations, U.S. Department of Transportation, Docket Operations, M-30, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue SE, Washington, DC 20590.

For service information identified in this AD, contact SOCATA, Direction des services, 65921 Tarbes Cedex 9, France; phone: +33 (0) 5 62 41 73 00; fax: +33 (0) 5 62 41 76 54; email: [info@socata.daher.com](mailto:info@socata.daher.com); internet: <https://www.mysocata.com/login/accueil.php>. You may view this referenced service information at the FAA, Policy and Innovation Division, 901 Locust, Kansas City, Missouri 64106. For information on the availability of this material at the FAA, call (816) 329-4148. It is also available on the internet at <http://www.regulations.gov> by searching for Docket No. FAA-2018-0326.

**FOR FURTHER INFORMATION CONTACT:**

Quentin Coon, Aerospace Engineer, 901 Locust, Room 301, Kansas City, Missouri 64106; telephone: (816) 329-4168; fax: (816) 329-4090; email: [quentin.coon@faa.gov](mailto:quentin.coon@faa.gov).

**SUPPLEMENTARY INFORMATION:****Discussion**

We issued a notice of proposed rulemaking (NPRM) to amend 14 CFR part 39 to supersede AD 98-16-03, Amendment 39-10677 (63 FR 40359, July 29, 1998) (“AD 98-16-03”). The NPRM was published in the **Federal Register** on May 9, 2018 (83 FR 21199), and proposed to correct an unsafe condition for SOCATA Model TB 9, Model TB 10, and Model TB 200 airplanes. We based the NPRM on MCAI originated by an aviation authority of another country. The European Aviation Safety Agency (EASA), which is the Technical Agent for the Member States

of the European Community, issued EASA AD No. 2018-0030, dated January 31, 2018 (referred to after this as “the MCAI”). The MCAI states that:

During a scheduled maintenance inspection, cracks were found on the wing front attachments of a TB 10 aeroplane.

This condition, if not detected and corrected, could affect the structural integrity of the aeroplane.

Prompted by these findings, SOCATA issued SB 10-081-57 to provide inspection and modification instructions, and DGAC France issued AD 94-264(A), later revised, to require repetitive inspections of wing front attachments of TB 9 and TB 10 aeroplanes (all MSN up to 822 inclusive, with some excluded). That [DGAC France] AD also required installation of reinforcement kits, applied as repair (if cracks were found) or as modification (if no cracks were found), of the wing front attachments, on both wing and fuselage sides, and repetitive replacement of those reinforcements afterwards.

Since DGAC France AD 94-264(A) R1 was issued, cracks have been found on wing front attachments, on the wing side, on TB10 aeroplanes to which the AD did not apply, *i.e.* which were not subject to repetitive inspections as required by that [DGAC France] AD. Consequently, SOCATA revised SB 10-081-57 (now at revision (rev) 3), extending the Applicability to all TB 10 aeroplanes, as well as to TB 200 aeroplanes, and improving the repair solution of the wing front attachment on wing side.

For the reason described above, this [EASA] AD retains the requirements of DGAC France AD 94-264(A) R1, which is superseded, expands the Applicability to all MSN for TB 9 and TB 10 aeroplanes and includes TB 200 aeroplanes, and requires an improved repair solution of the wing front attachment on wing side.

The MCAI can be found in the AD docket on the internet at: <https://www.regulations.gov/document?D=FAA-2018-0326-0003>.

**Comments**

We gave the public the opportunity to participate in developing this AD. The following presents the comment received on the proposal and the FAA’s response to the comment.

**Request for an Explanation of Compliance Time**

Daher requested that we explain why the compliance times in the NPRM are presented in landings and do not match the compliance times in the EASA AD, which uses both hours time-in-service (TIS) and number of landings.

The NPRM retained the compliance times from AD 98-16-03, which were based in landings instead of hours TIS. The NPRM also retained the formula for converting hours TIS to landings from AD 98-16-03 for airplanes with an unknown number of landings. Because we also retained the effective date of AD