



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-166

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**Commenter 1: Airbus Helicopters – Dave Vogel – 22/12/2016**

### **Comment # 1**

We really need this one finalized for the operators in the US. We have approximately 300 EC135's operating in North, Central and South America. There has already been several Main Transmissions removed early due to the wording in the EASA and FAA AD's. There is no mention to use the allowable 3% tolerance for TBO's. For the EC135 MGB 4649-010-XXX main transmissions that means they are losing up to 120 hours of revenue hours with their helicopters due to this wording.

Please push this one through. I have an AMOC penned with the FAA simply waiting for the release of the updated AD.

### **EASA response:**

**Comment noted. According to paragraph (4) of the PAD (paragraph (2) of the final AD), an affected main transmission must be replaced with a not affected one within 5150 FH after 28 October 2013. This interval already includes the 3% tolerance for TBO (5000 FH).**

**To be noted that, while in AD 2010-0213 the compliance time is also related to the TBO ("Within 4000 flight hours, or at the next main transmission repair or overhaul, whichever occurs first after the effective date of this AD, rework each main transmission housing upper part...."), the new AD has only the FH threshold (within 5150 FH after 28 October 2010).**

**Also to be noted that the compliance time defined in paragraph (4) of the PAD (paragraph (2) of the final AD) is not related to the MGB P/N.**

**No changes have been made to the Final AD in response to this comment.**

