



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-098

[Published on 24 July 2017 and officially closed for comments on 07 August 2017]

### Commenter 1: British International Helicopters – Eddie Goodall – 26/07/2017

#### Comment # 1

Thank you for receipt of your PAD 17-098 regarding ATA53 Aft Fuselage Skin Panels. SA365, AS365, SA366, and EC155 helicopters.

I found initial reading of this PAD page 2, “Repetitive Inspections” para’s 1 to 3 confusing in comparison to the requirements of Airbus Helicopters ASB AS365.05.00.77.

- I would propose that your PAD para 1 states- “Initial Inspection,” within 110 FH- accomplish a tapping/de-bonding inspection of the affected areas IAW para’s 3.B.1 and 3.B.2 of the applicable SB
- I would propose that your PAD para 2 incorporates para 3, and states – If no defect is discovered, carry out repetitive visual inspections every 110FH IAW para’s 3.B.1, and 3.B.3 of the applicable SB, plus repetitive tapping/de-bonding inspections every 660FH IAW para’s 3.B.1 and 3.B.2 of the applicable SB
- Para 4 of the PAD to become para 3 and states- If de-bonding is discovered which is within the limitations of the applicable ASB, (10cm x 10cm not crossing 2 skin panels), carry out repetitive 110FH tapping/de-bonding inspections IAW para’s 3B.1 and 3.B.2 of the applicable SB. Report size and location of de-bonding to Airbus Helicopters.
- Para 5 of the PAD becomes para 4 and states- If de-bonding is discovered which exceeds the limitations of the applicable ASB, cease flight. Prior to next flight, contact AH for approved repair scheme, or panel replacement.
- Para 6 of the PAD becomes para 5, and states Terminating Action- None.

#### EASA response:

***EASA disagree, the way as the AD is worded reflects the compliance time, the inspection requirements and the corrective actions as were determined during the risk assessment preceding the publication of the AD. The wording of the AD does not necessarily copying the compliance section of the associated Service Bulletin but refers to the technical instructions only provided by that Service Bulletin.***

