



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-155

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### Commenter 1: The Flying Bulls – Rebecca Valkyser – 07/11/2017

#### Comment # 1

Under point (1.3) it makes sense to mention that the replacement is just required if the history is partially or completely unknown.

Additionally the TRH has to be replaced before next flight if the calculated TRH hours are more than 27400 – NOT IN ANY CASE.

We are using our EC135 since new in 2006 and have an actual TT of 1283:37 as well as the TRH because it was installed new. Why should we replace it within 9 months as mentioned in the PAD. That's quite confusing.

#### EASA response:

**Comment not agreed. Paragraph (1.3) provides a “grace period” of 9 months after the effective date of the AD for the first replacement of the TRH P/N L642A2003102, which life limit is now listed in the ALS (currently 27400 FH). Paragraph (1.3.) allows deferring the first replacement, but does not mandate it, and is also applicable when the complete TRH history is known.**

**More specifically, the TRH installed on the abovementioned EC135 helicopter must be replaced before exceeding 27400 FH or within 9 months, whichever occurs later after the effective date of the AD.**

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

