



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-049R1

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**Commenter 1: Babcock International – Christophe Mury – 27/06/2018**

### Comment # 1

I come back to you after diffusion of PAD No.: 18-049R1. I think that there is some errors in this document which follow diffusion of ASB EC135-04A-013 Revision 0 (26 June 2018) and ASB EC135-64A-006 Revision 0 (20 February 2018).

A) In 'Definitions' chapter, you could see for 'Unserviceable part' the definition below:

**"an affected part, which has exceeded 6 800 basic FH, or 12 000 recalculated FH, or a tail rotor blade having P/N L642A2002101, and a serial number as listed in the re-identification ASB."**

➔ According manufacturer MSM chapter 04, Basic Life Limit for a Tail Rotor Blade P/N L642A2002101 and L642A2002111 is 12 000 FH, after application of ASB EC135-64A-006 on listed TRB, Recalculated Life Limit is 6800 FH.

B) Please note also that 2024 units of Tail Rotor Blade are concerned by ASB EC135-04A-013 and only 610 units by ASB EC135-64A-006 (I think that these 610 units are concerned by ASB EC135-04A-013), by this way it seems that  $2024 - 610 = 1414$  re-identified blades aren't concerned by recalculation of Life Limit (reduction from 12000 Fh to 6800 Fh).

C) In 'Part Replacement' chapter, you could see:

**"(1) Before exceeding 6 800 basic FH, or within 100 FH after the effective date of this AD, whichever occurs later, replace each affected part with a serviceable part. Using the instructions of the applicable maintenance manual is an acceptable method to replace a part as required by this paragraph."**

➔ 6800 aren't Basic FH but Recalculated FH.



Could you realize correction in PAD No.: 18-049R1, many thanks in advance

**EASA response:**

**A) Comment not agreed: the AD includes the definition of “basic FH”, as “FH (actually) accumulated by an affected part since its first installation on a helicopter, not taking into account the compensating hours as defined in the ASB”. A consistent definition of “recalculated FH” is also included in the AD.**

**B) EASA confirm that only some of the blades requiring reidentification are affected by the Life Limit reduction.**

**C) Comment not agreed: 6800 FH are basic FH: paragraph (1) of the AD actually requires to replace an affected part before exceeding 6800 hours in service. This can be done logging only the FH which are actually accumulated by that part (i.e., the “basic FH”, as defined in the AD), or taking into account the compensating hours (5200) as instructed in the ASB (i.e., the “recalculated FH”, as defined in the AD).**

**As an example, for a part which has never been installed on a helicopter, the “basic FH” are 0, the “recalculated FH” are 5200. That part can be operated for not more than 6800 FH: it means that it must be retired before exceeding 6800 “basic FH”, or before exceeding 12000 “recalculated FH” (5200 + 6800).**

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

