



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-049

[Published on 09 April 2018 and officially closed for comments on 07 May 2018]

Commenter 1: Helikopter Air Transport GmbH – Harald Messirek – 16/04/2018

Comment # 1

We have a request for the PAD 18-049 regarding the tail rotor blade life limit of the EC135 ASB EC135-64A-006.
The AD gives a limitation of 6800 basic FH or within 100 FH which produces an additional TCI for the blades.
The Airbus ASB gives a limitation of 12 Month or 1400 FH.
Could you please take the same limitations for your AD as stated in the Airbus ASB?

EASA response:

Comment not agreed: the 12 months/1400 FH quoted in the ASB is not a life limit. It is a compliance time by which operators should determine whether an affected part is installed and, if needed, update its logcard. After that, operators must remove the part before exceeding the life limit.

The AD does not require determining if an affected part is installed; the AD only requires replacing affected parts before exceeding the applicable life limit (i.e. 6 800 basic FH)

It is clearly assumed that operators will determine whether an affected part is installed before exceeding the life limit, but this determination (being not a requirement of the AD) does not need to be recorded as compliance with AD.

To be noted that the AD allows using the method described in the ASB (i.e., adding 5200 compensating hours to the FH actually accumulated by an affected part, then replacing the part before exceeding the life limit identified in the MSM)

No changes have been made to the revised PAD in response to this comment



Commenter 2: DRF Stiftung Luftrettung gemeinnützige AG – Michael Stark – 17/04/2018**Comment # 2**

We have the following comments to the above mentioned PAD:

Ref. Page 2

Part Replacement:

(1) Before exceeding 6800 basis FH, or within 100 FH after the effective date of this AD.

For us it makes no sense to replace the tail rotor blade within 100 FH after the effective date of this AD when the life limit of the tail rotor blade is not reached.

EASA response:

Comment not agreed: AD requires replacing the part “before exceeding 6 800 basic FH, or within 100 FH after the effective date of the AD, whichever occurs later”. The 100 FH is only applicable for parts which, on the effective date, have already exceeded (or are near to exceed) the 6 800 basic FH life limit. No changes have been made to the revised PAD in response to this comment

