



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-154

[Published on 09 November 2018 and officially closed for comments on 07 December 2018]

**Commenter 1: Swiss Helicopter AG – Christian Koller – 12/11/2018**

### Comment # 1

1. Comments, due to EASA 1321/2014 it is mandatory to have an approved AMP with CHPT 04 & 05 integrated! So for us it makes no sense to have this a second time integrated as AD?
2. Our organization ( PART-145 Swiss Helicopter AG ) has no access to the overhaul manual Chapter 05-10 of Overhaul Manual X 292 R1 500 2, both issue 15 and both dated 30 November 2017?

### EASA response:

*Comments noted. No change have been made to the Final AD in response to this comment.*

1. *The ALS (Chapter 05-10 of SAFRAN ARRIEL 2D, 2E and 2N Maintenance Manual) is part of the certificated engine type design (Part 21.A.31.a), that contains the mandatory scheduled maintenance items and the limitations for part replacement, necessary to maintain compliance with that type design. For each individual aircraft, an approved aircraft maintenance programme (AMP) must be created, initially containing the ALS at the revision level applicable at the time of the aircraft's first certificate of airworthiness. The ALS content for engines is regulated by the airworthiness codes, e.g. CS-E 25. Each subsequent change to the ALS is approved by EASA. In view of the nature of the tasks contained in the ALS, failure to comply with an ALS revision (i.e. new or more restrictive tasks) would – in general – lead to an unsafe condition. Since EASA (under art. 77 of regulation (EC) 2018/1139) carries out the ICAO functions and tasks of the State of Design on behalf of EASA Member States, EASA notifies new or more restrictive ALS tasks as 'Mandatory Continued Airworthiness Information' to ICAO Contracting States by taking AD action for these specific ALS revisions.*

*Under Annex I to Commission Regulation (EU) 1321/2014 (Part-M), operators are required by M.A.302 (a) to have an approved AMP, which establishes compliance – M.A.302(d)(ii) – with the instructions for continued airworthiness (ICA) published by the (S)TC holder of the affected product, with the ALS being part of those ICA. However, Part-M does not specify exactly when, after publication of an ALS revision, an AMP must demonstrate compliance with that particular ALS revision and, consequently, from which time the new or more restrictive ALS tasks must be complied with. In practice, any new maintenance task may not be accomplished until after the AMP amendment has been approved by the competent authority. These are additional reasons why EASA issues an AD for an ALS revision: to require, from the effective date of the AD*



*(even before the AMP amendment), the accomplishment of the maintenance tasks (before exceeding their due date) and to require the amendment of the AMP within a clear (and reasonable) compliance time.*

- 2. This is to confirm that Chapter 5-10 of SAFRAN ARRIEL 2D MM ref. X292 R1 450 2 is identical to Chapter 05-10 of Overhaul Manual X 292 R1 500 2. So you will find the ALS tasks in the referred MM.**

**Commenter 2: Findel Aviation – Christophe Maillard – 12/11/2018**

**Comment # 2**

**Comments noted. No change have been made to the Final AD in response to this comment.**

As CAM of CAMO LU MG 1002, I would like to have the PAD 18-154 reviewed with you to be sure I have well understood all the subtlety of this content. If I'm right in my understanding, and to be short, it is required to have the ALS applied by one hand, right?

That is already mandatory and validated by the EASA in the header of the ALS itself.

And by the other hand, to revise the approved AMP, on the basis of which the operator or the owner ensures the continuing airworthiness of each operated helicopter, by incorporating the limitations, tasks and associated thresholds and intervals described in the applicable ALS, as applicable to engine configuration within 12 months.

There is no doubt I have a very basic approach of the situation, but I didn't see yet what there is inside this proposal that is not already contained into the basic regulation 1321/2014, Part M.A.301, paragraph 3.

Just to be sure this future AD won't be a waste of time for any organizations (Yourself, TCH, operator, CAA...) involved in the management of the ADs according a long and strict process. To be honest I didn't see any airworthiness issue addressed with this document nor any added values that is not already managed by others EASA approved documents.

**EASA response:**

**See answer to point 1. of comment 1.**

