



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-002

[Published on 08 January 2019 and officially closed for comments on 22 January 2019]

### Commenter 1: Servicios Helicenter – Ricardo Tuseddo – 10/01/2019

#### Comment # 1

Please try to clarify concepts to STORAGE LIFE definitions:

Storage life: Calendar time accumulated by a TT-Strap since cure date up to the first flight after first installation on a helicopter, including the calendar time accumulated after first installation on a helicopter.

#### EASA response:

*Comment noted: the clause “including the calendar time...” has been added to avoid confusion.*

*In a more common sense, “storage life” of a part may be understood as the “shelf life”, which typically refers to a part kept under certain storage conditions, in order to maintain its performance. With this understanding, installation of that part on a helicopter would determine the storage life accumulated by that part.*

*The “Storage life”, as defined in the AD, includes also the time accumulated after the installation, up to first flight after installation.*

*E.g.: for a part which cure date is 01 January 2000, first installation occurred on 01 January 2001, and first flight after installation occurred on 01 February 2001: the storage life, as defined in the AD, is 13 months.*

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

### Commenter 2: The Flying Bulls – Gerhard Moik – 15/01/2019

#### Comment # 2

Is there any evidence, that long term storage (in controlled environment) does affect the airworthiness of the TT straps (who has determined the deterioration of the elastomeric part, as stated in the PAD?).



Are there any in service difficulties based on calendar age? Any Incident or accident reports caused by high CALENDAR Time of the affected parts?

***EASA response:***

***Comment noted: EASA cannot provide the requested information, which contains propriety data.***

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

