

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-017

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Commenter 1: British International Helicopters – Eddie Goodall – 05/02/2019

Comment # 1

I have read with concern your PAD 19-017 in respect of the Tail Rotor Drive Flange – (Mandatory application of modification 0763C81) . My concerns emanate from your application of this AD to post mod 0763B64 helicopters only, and also at the PAD stated compliance date/time of 600FH / 12 months from the effective date of the AD.

The applicable Airbus Helicopters ASB 365.63.00.19.R1 effectivity is for both pre, and post mod 0763B64 Main Rotor Gearbox output shafts, with a compliance requirement of 12months /600FH for pre mod 0763B64, effective from receipt date of the ASB 365.63.00.19.R1. (31st January 2019).

The effective date for the post mod 0763B64 MGB output shaft however at ASB 365.63.00.19.R1 remains as 24months / 600hr from the effective date of the ASB 365.63.00.19.R0. (22nd January 2018) .

- It would appear that the main concern being communicated by Airbus Helicopters through ASB 365.63.00.19.R1, concerns the post mod 0763B64 MGB output shaft fitted with a Sur Lok nut, although unlike PAD 19-017, it does not exclude the pre mod 0763B64 MGB output shaft from application of the modification 0763C81.

- The PAD 19-017 mandatory modification 0763C81 compliance to a post mod 0763B64 MGB output shaft differs greatly from the ASB 365.63.00.19.R1, which is taken as 600hrs/24 months from the date of revision 0 of that ASB , dated 22 January 2018.

The PAD 19-017 effective date of 600hrs / 12 months from the effective date of the PAD 19-017, will allow a helicopter which has perhaps completed 600 flight hours since the issue of ASB 63.00.19.R0 on 22 January 2018, and due compliance , to gain another 600FH, and also a calendar compliance deferment with the issue of PAD 19-017.

- It would appear that given the critical nature of the PAD 19.017, especially with another reported disengagement of the tail rotor drive from an AS365 helicopter, that the compliance time for a post mod 0763B64 MGB output shaft should remain as per ASB 63.00.19.R1 and R0, as 600hr /24



months from the date of effectivity of R0 of that ASB.(31st January 2018). It should not receive a calendar or potentially very large flight hour extension as would be given by the issue of the current PAD 19.017 compliance of 600hr / 12 months from the effective date of the PAD 19.017.

EASA response:

The driver of an AD is an unsafe condition. In this case AH and EASA have identified the unsafe condition associated to the lack of locking of the nut P/N 360A32-2034-23 (“Shur-Lok nut”). Helicopters in “pre-mod 0763B64” configuration have a different locking system and therefore they do not fall under the same unsafe condition and that is the reason why they have not been included in the AD applicability. The ASB mandates the retrofit for post-mod configurations (compliance “mandatory”) while it is considered “essential” but not “mandatory” for pre-mod configurations.

In terms of flight hours exposure, the evaluation for this unsafe condition still supports the proposed 600 FH proposed in the (P)AD. Please note that the AD cannot require any action retroactively, except cases when the AD refers to previously issued AD. The original issue of AS365-63.00.19 was not mandated in the past by any previously issued AD and its incorporation by operators was ‘voluntary’ and not enforceable from regulatory point of view. The ASB and the AD are two separate documents, with two separate responsibilities behind it. The ASB provides the accomplishment instructions but the AD provides the mandatory compliance time, which is enforceable by the law/regulation.

As a side consideration, regular maintenance activity every 600 FH on the subject area remains applicable and the implementation of the ASB R1 (and compliance to the AD) would be natural prior to reach the AD compliance limits.

