

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-222

[Published on 20 December 2019 and officially closed for comments on 17 January 2020]

Commenter 1: Mecaer Aviation Group – Achille Ambrosini – 09/01/2020

Comment # 1

Our company installs STCs on helicopter model AW139 and MBB-BK117 D-2.

Our STCs include the relocation of the fire extinguisher object of the PAD No. 19-222 (item fire extinguisher has the same P/N of TC holder).

We require you to introduce in the Applicability section of the PAD the statement: "applicable STCs".

EASA response:

Comment partially agreed. EASA is aware of several Mecaer Aviation Group STCs, e.g. installing VIP interiors, where an affected fire extinguisher may be part of the configuration modification/installation instructions. However, the AD applies to the helicopters identified, irrespective of the method by which an affected fire extinguisher was installed, either on the production line, or by STC, or by minor modification.

The Final AD has been amended to clarify this point, without identifying STC numbers, by introducing Note 1.

Commenter 2: umlaut – Kai Hartmann – 16/01/2020

Comment # 2

- A. In section "Definitions": please change "The VSB" to "VSB".
- B. In definition "Affected part": please change "(month)" to "(MM/YYYY)"; please change "s/n" to "S/N"; please change "SB" to "VSB". The term "VSB" as defined in section "Definitions".
- C. In section "Reason": please change "SB" into "VSB".
- D. In paragraph (1) "Replacement": Is there any reason for "whichever occurs later" instead of "whichever occurs earlier"?

E. Additionally, please ensure that the applicable hyperlinks inside the PAD are updated.

EASA response:

A. Comment not agreed. Since all references in the AD are to ‘the VSB’ we prefer to keep the definition unchanged.

B. Comments partially agreed. For ‘serial number’, the EASA standard acronym is ‘s/n’ (lower case). The AD has been amended to apply the other suggested changes.

C. Comment agreed. The Final AD has been amended accordingly.

D. The wording ‘whichever occurs later’ is to address a scenario where “the next scheduled annual inspection of the affected part” occurs shortly after the AD effective date. With this wording, the replacement can be deferred for a period up to 4 months.

E. Comment agreed. Hyperlinks have been amended.

No changes have been made to the Final AD in response to points A and D of this comment.

