

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-001

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Commenter 1: Federal Police of Germany – Bernd Laux – 07/01/2020

Comment # 1

Federal Police of Germany Air Support Group (Bundespolizei-Fliegergruppe, BPOLFLG), as operator of nineteen “Group 1” and four “Group 2” AS332L1 helicopters, requests a change of PAD N° 20-001, in the Part Installation Section of the PAD. It should be further on allowed to install a “Group 1” affected TRH assembly, under the condition of paragraph (5.1) or (5.2), on a “Group 2” helicopter (paragraph (6)).

Reason(s):

On all twenty-three AS332L1 of our fleet, regardless if “Group 1” or “Group 2” helicopter, a deicing sliping is installed on the TRH shaft. This sliping has to be removed for overhaul every six years. For the sliping replacement the TGB / TRH assembly has to be send to a shop. Currently it is possible to install a “Group 1” TRH assembly on a “Group 2” helicopter, as replacement. After effectivity of the AD this would not be possible anymore. Secondly it would not be possible to return a “Group 1” helicopter to “Group 1” after first-time installation of a “Group 2” TGB / TRH assembly, which makes the whole a/c belonging to “Group 2”. “Group 1” affected TRH, in the condition of paragraph (5.1) or (5.2, after bearing replacement), are considered as airworthy on “Group 1” helicopters. There is no evidence that they don’t have the same airworthiness on “Group 2” helicopters (which got the attribute “Group 2” by dedication only).

Several TGB / TRH assembly replacements per year, caused by due slipings, make it necessary to have full interchangeability between “Group 1” and “Group 2”.

Thus BPOLFLG requests to modify the AD, to allow installation of an affected TRH assembly on a “Group 2” helicopters. With the consequence that it (temporarily) gets a “Group 1” helicopter again and of course needs the repetitive inspections, again.

EASA response:

EASA agrees with the comment. As a consequence, paragraph (6) of the PAD is removed and provisions for part installation defined in paragraph (5) are supplemented and made applicable to “Group 2” helicopters. The final AD has been amended accordingly.