

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-020

[Published on 28 January 2020 and officially closed for comments on 25 February 2020]

Commenter 1: Erickson – Christopher Erickson – 28/01/2020

Comment # 1

Concerning your PAD 20-020 I find the following:

- A. There is no evidence of P3APP003010A or P3APP003010C ever used in S-64 design data. Please remove Erickson and S64F reference from the PAD as referenced in the mark-ups on the pdf [as provided to EASA].
- B. The TCDS is S64F and owned by Erickson. “Applicability”: The S64F is Erickson, not Sikorsky.

EASA response:

- A. Comment noted, but not agreed. Although we concur that the affected fire extinguishers are not part of the Erickson type design, it is still possible that an affected extinguisher has become installed in service by minor modification. If so, that must be removed.**
For helicopters that do not have an affected extinguisher installed, no corrective action is required, only the requirement of paragraph (2) must be complied with.
- B. Comment partially agreed. The Applicability section of the AD refers to the “Manufacturer” of the helicopter and not to the TC holder. However, the EASA TCDS IM.R.003 currently indicates Erickson as both TCH and Manufacturer. Therefore, the “Applicability” of the Final AD has been amended accordingly.**

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

Commenter 2: umlaut – Kai Hartmann – 29/01/2020**Comment # 2**

- A. Can EASA team please clarify why a separate PAD (PAD 20-020) has been launched? As per our understanding, the content of the mentioned PAD is the same content as of EASA PAD 19-222, except the additional TC-Holders. Is there any specific reason for this?
- B. Can EASA acknowledge that the EASA PAD 19-222 requires an update based on our comments provided on the 16.Jan 2020 (umlaut comment paper is attached to this email). Especially the hyperlinks within the EASA-document require an update. Can you please clarify?
- C. Will the two mentioned PAD be merged into one PAD/AD?

EASA response:

A. Comment noted. PAD 19-222, now [AD 2020-0013](#), applies to European-design helicopters, i.e. type designs for which EASA represents the States of Design. By contrast, PAD 20-020 applies to helicopters designed outside Europe, for which EASA does not represent the State of Design. In this case, EASA issues the AD, representing the European States of Registry.

It is EASA preference (with only a few exceptions) to have separate AD actions for cases where EASA represents the State of Design and those where EASA does not.

B. Comment noted. In EASA view, no update is necessary. Note that previous comments and suggestions on PAD 19-222 have been answered in the CRD for PAD 19-222, which can be found in the compressed (zip) file attached to the record of AD 2020-0013 (hyperlink above).

C. For the reasons explained under points A. and B. above, this will not be done.

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

