

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-027

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Commenter 1: Bristow Helicopter – Tim Lennon – 07/02/2020

Comment # 1

With regard to the generic nature of AMOC 10071362 and reading the EASA AMOC FAQ below, I would have expected to see a revision of EASA AD 2019-0193. As this PAD will supersede EASA AD 2019-0193, the current AMOC 10071362 would be invalidated.

With Leonardo not yet updating DM's 89-A-64-31-04-00A-720A-A or 64-31-00-01-030 with the alternative procedure as per 189G0200X004, we believe TRA P/N 6F6730V00332 will still have the same issues with the minimum breakaway torque guaranteed by the nut.

"The AD has been superseded: Is the related AMOC still valid?"

The supersedure of an AD always and automatically invalidates any AMOC related to that AD.

Even though the technical solution as specified in an AMOC may still be acceptable for compliance with the new AD, this acceptability must be confirmed. To achieve this, the AMOC approval holder (if that organisation wishes to remain the responsible approval holder) would need to apply for an AMOC to EASA, using FO.CAP.00042.

There is no (other) process in existence to 'transfer' an AMOC approval from one AD to another.

Are AMOCs published to EASA's web site?

No, EASA provides the AMOC approval only to the applicant (the AMOC approval holder) that has applied for it and, if relevant, to the authority of state of registry (in case of an application coming directly from an operator).

Therefore EASA does not publish AMOCs to its web site, or add the AMOCs to the AD tool - as it does for PADs and ADs.

Where an AMOC to an EASA AD is of generic nature e.g. not limited to a few aircraft, this should lead to a revision of the affected AD. The AD would then be posted to EASA's website and the alternative method of compliance in that way then made public."

EASA response:

Comment noted. It is correct that when an AD is superseded, all related AMOC become invalid. So, with the publication of the Final AD, EASA AMOC 10071362 will become invalid. In addition, an AD revision cannot be envisaged in that case, as additional actions are required by the Final AD.



EASA also confirms that, if the alternative procedure as per 189G0200X004 needs to be covered by an AMOC, Leonardo will apply to EASA for that new AMOC, which can then be provided by Leonardo to operators that need it.

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

