

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-117

[Published on 06 August 2020 and officially closed for comments on 03 September 2020]

### Commenter 1: Leonardo Helicopters – Alfonso Messina – 10/08/2020

#### Comment # 1

I have some doubts about the requirements specified in table 5 for groups 1 and 2, but it can be extended to all the requirements for the same groups. It is required the accomplishment of the part VI of the ASB1 within 10 FH after last accomplishment of Part I of ASB1 and subsequent at interval not exceeding 200 FH. In that way, if I have already accomplished to part VI, for example 20 FH ago, I have to repeat that part within 10 FH after the accomplishment of part I, it means within 30 FH from the last accomplishment.

In my opinion, it would be better to specify that the accomplishment of the requirements for group 1 and 2 must be accomplished within the specified threshold, or within the required time from the last application of the same part, if already accomplished as AD2020-0048.

In that manner it could avoid some misunderstanding, considering also that the Part I of ASB1 is not applicable for group 2.

#### EASA response:

**Comment agreed.** The comment is related to the requirements of paragraphs (1), (2), (3), (4) and (5) of the AD, which basically aim to carry on with the repetitive inspections for the Group 1 and Group 2 helicopters introduced by EASA AD 2019-0193, and then retained by EASA AD 2020-0048, which is now superseded. Therefore, to ensure smooth continuity and no disruption of the inspections regime for Group 1 and Group 2 helicopters, the relevant compliance time thresholds of this Final AD, for the paragraphs listed before, have to be defined with reference to the last time the inspections were accomplished “as previously required by EASA AD 2020-0048”.

**The Final AD has been amended accordingly.**

**Commenter 2: Norwegian Police – Kenneth Dahlqvist – 11/08/2020****Comment # 2**

Can you please add 10 % of tolerance on all limits so it will be easier to incorporate this in to the normal scheduled maintenance schedule? We operate and maintain 3 AW169 for the Norwegian police and have high utilisation on these aircraft. Hope that you can consider this when you release the AD with reference to Leonardo SB 169-178.

**EASA response:**

***Comment not agreed. The introduction of the new TR DB part, with its improved performance, increases the confidence in this installation to a justified level that allows to grant the mentioned tolerance of 10% to the compliance times for the applicable inspection ASB2 and applicable modification SB2.***

***However, for Group 1 and Group 2 helicopters that are still equipped with the affected TR DB, such a level of confidence is not given, thus the adherence to the previously identified compliance times in the applicable inspection ASB1 and the applicable modification SB1 remains required.***

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

