

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-097

[Published on 09 July 2021 and officially closed for comments on 06 August 2021]

**Commenter 1: Dirección General de Tráfico Spain – Javier Sánchez de Cima – 13/07/2021**

### Comment # 1

My name is Javier Sánchez. I am the quality manager of the operator Dirección General de Tráfico (DGT) in Spain. I am reaching out to you because I would like to ask you some questions related to the EASA PAD 21-097 published on July 9th 2021.

- A. We are an organization which operates AS355N and AS355NP models. After reading the PAD, we have noticed that our company isn't affected because we have already included all the ALS applicable instructions for our models in our approved aircraft maintenance program (AMP). However we are actually recording all the accomplishment of the ADs that are already included in the ALS (AD 2010-0006 and AD 2015-0094 and others). Regarding the last paragraph of this PAD ("Recording AD Compliance"), we have next comments and doubts: The ALS of the AS355 contemplates another ADs which are already included (and are not mentioned in the PAD 21-097). These are:

Relation of ADs already included by Airbus Helicopters in the ALS (AS355)	
AD 2012-0257	ASB 05.00.63 R2
AD 2015-0195	ASB 01.00.57 R2

Could you think about modify this PAD in order to include the related ADs so the operators could stop recording them like the AD 2010-0006 and the AD 2015-0094 that you suggest? If you are agree, even these AD's could be also cancelled as you propose in the PAD with AD 2010-006 and AD 2015-0094.

- B. Besides that, we would like to ask you about all the ADs/SBs which are already included in the AH Master Servicing Manual (MSM). In spite of this instructions come from Alert SB's, finally have been incorporated in MSM instead of ALS, but from operator point of view, MSM instruction are incorporated in our AMP so is the same situation for us. So according to the manufacturer documentation, these ADs/SBs are included (and also included in our AMP). We understand that probably in this case is not so easy to cancel related AD's, but comparing with previous comments and PAD, we don't find any reason to accomplish individual actions for demonstrate AD compliance.

Relation of ADs already included by Airbus Helicopters in the MSM (AS355N)		Notes
AD 2011-0072	ASB 05.00.58 R1	
AD 2015-0195	ASB 01.00.57 R2	This is also included in the ALS
AD 2006-0249	SB 05.00.58 R1	
AD 2012-0022	ASB 80.00.12 R1	
AD 2014-0135	ASB 05.00.68	

Relation of ADs already included by Airbus Helicopters in the MSM (AS355NP)		Notes
AD 2015-0195	ASB 01.00.57 R2	This is also included in the ALS
AD 2014-0135	ASB 05.00.68	

**EASA response:**

**A. Comment not agreed. The requirements and the applicability of EASA AD 2012-0257-E and EASA AD 2015-0195 have not been fully incorporated into the applicable ALS yet. However, those ADs are expected to be cancelled once the update (i.e. transfer of all AD requirements) of the applicable ALS is completed.**

**B. Comment not agreed. A Master Servicing Manual (MSM) is not officially approved by EASA, therefore an EASA AD requiring accomplishment of the tasks addressing an unsafe condition cannot be cancelled, even if those tasks are included in a relevant MSM.**

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

