

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-021

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Commenter 1: German Aerospace Center (DLR) – Holger Johannsen – 16/02/2023

Comment # 1

ref /A/ Hoist Equipment P/N 44307-500

ref /B/ PAD 23-021, dated from 15 February 2023

ref /C/ AHD ASB EC135-85A-078, Revision 0, dated from 31 January 2023

ref /D/ ALS Task 85/12/00/000/000/012 - Do the inspection of the Boom Assembly - 10Y // 3330 HC

DLR is using from time to time a hoist equipment on his experimental helicopter EC135 S/N 0028. As the DLR did not has his own hoist equipment, in case of need, we are looking on the market for a rental unit for a dedicated time period. The last unit we ordered was a ref /A/ P/N.

After reviewing the ref /B/ PAD DLR has some concerns about the wording in the “Required Actions” part of the PAD as the responding ref /C/ ASB is providing some different requirements.

- A) Per ref /B/ para (1), the PAD is asking for a repetitive inspection for affected parts
- before accumulating 3,330 cycles since first installation (TSN),
 - or since last overhaul,
 - or within 30 days

The ref /C/ ASB is asking for a repetitive inspection for affected parts

before accumulating 3,330 cycles

- since first installation (TSN)
- or since last overhaul

and is giving a grace period of 18 month with a repetitive inspection every 30 cycles.

The position of the comma in this case is really important!



With the comma in the current position, the 3,330 cycles are not linked to the overhaul and the repetitive inspection of every 30 cycles is due immediately after an overhaul.

The ref /C/ ASB is different and in my eyes much clearer in this position.

Proposal: Delete the comma in this position or add the 3,330 cycles limitation to the overhaul.

- B) Per ref/B/ PAD para (2), within 18 months after the effective date of the (P)AD each affected part needs to be inspected i.a.w. the instructions of the ref/D/ ALS.

This requirement to check **all affected parts** doesn't matter about the usage per ALS within 18 month is not listed in the ref /C/ ASB.

However, the ref /C/ ASB is providing a grace period of 18 month after receipt of the ASB with a repetitive inspection every 30 hoist cycles for all affected parts **with more than** 3330 hoist cycles since new or since overhaul.

This is different to the ref /B/ PAD.

- C) Per ref /B/ PAD para (7) it is only allowed to install an affected part on a helicopter, provided it is a serviceable part, as defined in this (P)AD, and that, after installation, it is inspected as required by this (P)AD.

DLR has the concern, what does "inspected as required by this (P)AD" means under consideration of:

- a. Per ref /B/ PAD definition, a serviceable part is a part which has not exceeded the service life limit as identified in the ref /D/ ALS.

Or in other words, a part in line with the requirements of the ALS is in respect of limits and workscope.

- b. Per ref/B/ para (2) the inspection of an affected part i.a.w. the instructions of the ASB needs to be performed within 18 months after the effective date of the (P)AD.

- c. Ref /B/ PAD, Para (6) is stating, the inspection per ref /B/ PAD para (2) constitutes a terminating action for the repetitive inspection as required by ref /B/ PAD para (1).

Coming back to ref /B/ PAD para (7), which only allows to install serviceable parts which are in line with the requirements of the ref /D/ ALS, whereby a serviceable part in line with the requirements of the ref/D/ ALS is also considered per ref /B/ PAD para (6) as a terminating action for ref /B/ PAD para (1) inspection.

What does "inspected as required by this AD" means?

Isn't the installation of a serviceable part a terminating action for the whole inspections as requested by ref /B/ (P)AD?

Or is the inspection limit of 10 years per ref /D/ ALS replaced by an 18-month inspection limit per ref /B/ PAD?

EASA response:

1A) Comment noted. Additional wording has been added in the AD to clarify the compliance time for the initial inspection.



1B) Comment agreed. Paragraph (2) of the AD has been updated, clarifying that the inspection iaw the ALS is required before exceeding 3 330 cycles since first installation/overhaul.

1C) Comment not agreed: “Which has not exceeded the service life limit, as identified in the ALS” means “a part which has not exceeded 16650 hoist cycles” (being 16650 HC the current life limit as published in the ALS), irrespective of other inspections accomplished on that part (e.g., overhaul, or inspection iaw the instructions of the SB). Having a reference to the ALS, rather than quoting the life limit in the AD, allows flexibility and will not require an amendment of the AD if, in the future, that life limit will be updated.

To be noted that ALS Task 85/12/00/000/000/012 has been updated with DN.009.0015.0, removing the 10 years requirement.

“Inspected as required by this AD” means that a part must be inspected as required by paragraph (1) or (2) of the AD, as applicable: as soon as the inspections iaw the ALS (as defined in the AD) are accomplished (currently, at intervals not exceeding 3330 HC), as required by paragraph (2), the repetitive inspection required by paragraph (1) of the AD are no longer applicable.

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

