

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-048

[Published on 19 April 2023 and officially closed for comments on 17 May 2023]

Commenter 1: O'Brien Helicopters, Inc. – Jarlath O'Brien – 14/05/2023

Comment # 1

We are writing with a request to postpone the possibility of this AD being issued, because of Agusta's Bulletins pertaining to this Duplex Bearing have not been analyzed properly, taking into account, when the Lubrication Kit Mod is installed, there is no need for the 24-month tear down reducing the risk of a mechanic maintenance defect occurring.

This Duplex Bearing has been an ongoing issue. A Bulletin came out in 2014 followed by (FAA) AD 2014-02-08; then subsequently, another (FAA) AD 2015-11-08 replacing the previous (FAA) AD was issued.

The Duplex Bearing blunder began when Agusta changed their maintenance procedure for greasing it, to a 600 hr / 24 mos. In order to grease the old system, you had to pull the T/R Duplex Bearing Housing apart every 24 months. So to avoid this, we went ahead and purchased the "Lubrication Kit Mod" P/N 109-0823-04-101, therefore we no longer need to tear down T/R Assy, including the Bearing, out of the housing to grease it.

When the (FAA) AD 2015-11-08 was issued, we contacted the FAA Aircraft Certification Office in Fort Worth Texas and spoke with Inspector (NAME). We explained to him that there was no need for disassembling the Duplex Bearing to grease it, that we had installed the Lubrication Kit Mod.

(THE INSPECTOR) explained to me that his hands were tied because EASA issued it and they are merely following EASA because of a bilateral agreement.

This is the reason why we are writing to you, because there have been too many errors made by Agusta when they issue their Bulletins in relation to this Duplex Bearing.

We are already complying with the (FAA) AD 2015-11-08 prior to each flight, which we should have been exempted from, since we have the Lubrication Kit Mod installed.

It makes no sense to issue another AD concerning the same Duplex Bearing.

EASA response:

Comment not agreed. Available data does not support postponing the publication of the AD, as proposed.



To be noted that the AD identifies as 'affected part' any (part) which has been disassembled and (re)assembled in service (except those which have been last time assembled in accordance with the instructions of the updated procedure - as referenced in Annex A of the ASB). Consequently, a part which has never been disassembled in service is not an affected part, and no action is required by this AD on that part.

To be also noted that FAA AD 2015-11-08 has different requirements from EASA AD 2012-0195-E (FAA corresponding AD: 2014-02-08).

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

