

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-110

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Commenter 1: Royal New Zealand Air Force – Leith Esterhuizen – 09/11/2023

Comment # 1

The RNZAF have complied with EASA AD 2020-0256 conducting initial finding notification and ongoing inspections at 100FH intervals. To date no cracking has been found with current RNZAF frame FH ranging from 1900 - 2600FH. The RNZAF requested LHD provide an indication of the number of applicable frames affected globally, to which they were unable to provide a consolidated response only noting one repair which was conducted on an NZ registered A109E.

The RNZAF is interested to know if EASA would seek further clarification of the issue and the risk to airworthiness based on rate of occurrence. Can the requirements of the AD be further refined to specific variant/s and/or aircraft tail numbers which could likely have been affected due to operational, engineering, or manufacturing issues. If not, does the design data validate insufficient structural integrity and justify the requirement to conduct the reinforcement of the centre fuselage frame assembly.

EASA response:

Comment noted: available data do not allow identification of sub-population, which could be exempted by the modification requirement of this AD, nor determination of a different compliance time depending on (e.g.) operational use. EASA confirms that available data justify the requirement for modification of all affected helicopters. EASA reminds that specific cases can be managed through the AMOC process.

