

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-048

[Published on 02 April 2024 and officially closed for comments on 30 May 2024]

Commenter 1: Aerocom Aviation Oy – Mika Nikmo – 03/05/2024

Comment # 1

A question about the applicability of the proposed AD:

When the ASB EC130-64-00-0001 was published, I noticed that the wording of applicability was not perfectly clear. I contacted Airbus Helicopters Technical Department asking clarification. The mentioned task AMM task 64-21-00.6-27A or AMM task 64-21-00.6-27B are normally due only at 1000FH or 1200FH and our helicopters are fairly new, thus these tasks have never been accomplished on our helicopters. My interpretation was that the old procedure was lacking, which is why they have updated the procedure in AMM, but if your helicopter has been inspected in accordance with the old instructions, it has to be inspected again in accordance with the ASB following the new improved procedure, which has now been incorporated into manufacturer documentation so any following inspections can be done in accordance with AMM and no need to do the ASB separately. The wording in the PAD supports this interpretation. So in effect the ASB does not reduce the normal inspection interval, it merely introduces a supplementary inspection into the old procedure which was missing. My conclusion was that the ASB is NOT applicable if the mentioned tasks have not been done previously.

However, AH answer was:

"First at all, I confirm that the ASB is applicable (330 FH or 1 year (the first limit you get to is applicable)) to aircraft that have never been inspected iaw the AMM 64-21-00,6-7A/B.

These AMM are referred by following maintenance chapters:

- MSM 05-22-00 for a/c flying in tropical and damp atmosphere)
- ALS 04-20 1000Fh (for a/c flying in tropical and damp or salt-laden atmosphere)
- ALS 04-20 1200FH (normal atmosphere).

Then, the PP of both AMM don't provide any additional criteria, they just improve the wording (blades is replaced by lamella, notes and caution are added).

This ASB must comply with in addition to the requirements of the ALS/MSM."

I wasn't satisfied with the answer because it was in disagreement with the wording of the ASB. So I asked once more either to clarify the answer or provide an erratum for the ASB to improve the wording in the applicability section.



AH answer:

"I just checked with ASB dept., you have to carry out his ASB.

On my side, I push this TE to AH ASB dept. to update the ASB."

On our aircraft the AMM task 64-21-00.6-27A or AMM task 64-21-00.6-27B have never been accomplished so the proposed PAD would be in disagreement with Airbus Helicopters answer. The ASB has not been updated as of yet.

The applicability of the proposed AD has to be perfectly clear and clarified with Airbus Helicopters before publication of the AD. The current status leaves doubt among end users and may lead to unnecessary expenses as the actions in the ASB requires considerable amount of work and downtime of the helicopter.

EASA response:

Comment noted. AH has been contacted to clarify the issue and it is understood that a revised answer was sent to Aerocom Aviation Oy by AH. Consequently, this comment became irrelevant. No changes have been made to the Final AD in response to this comment. See also EASA answer to Comment # 2.

Commenter 2: CAA UK – Brian Roberts – 10/05/2024

Comment # 2

Having read your PAD 24-048 it is not clear to me if this Proposed Airworthiness Directive or the associated ASB EC130-64-00-0001 is mandating a single (one time) inspection of the Lamellas of the tension-torsion bar.

If this is a one off inspection, have Airbus Helicopters created repeat inspections which operators would manage through their maintenance programme.

EASA response:

Comment noted. The AD requires one time inspection. AMM task 64-21-00, 6-27A and AMM task 64-21-00, 6-27B have been amended, clarifying the inspection instructions. The AMM inspections are repetitive. EASA final AD has been amended with Additional Maintenance Requirements paragraph, in order to assure that the clarified instructions are used in the future.

