

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-084

[Published on 16 June 2025 and officially closed for comments on 14 July 2025]

Commenter 1: Bristow Helicopter Ltd. – Timothy Lennon – 01/07/2025

Comment #1

1. Having checked 23 out of 26 AW189 aircraft with a 0% fail rate, we request to remove AW189 from the AD. We don't expect to find any cracks on the remaining 3 aircraft currently on base maintenance.
2. We have had a higher failure rate on the AW139 aircraft. The pedals are, normally, not operated under high stress or moved in extreme/maximum positions during flight. At take-offs and landings, taxiing, braking, parking brake application on non-power assisted brakes and some during seat adjustment the yaw pedals are moved/ pushed / stressed, which are all related to the Landings parameter rather than the Flight Hour parameter. Would an interval based on Landings parameter be a more accurate parameter than Flight Hours?

EASA response:

Comment #1.

1. **EASA disagrees: It is noted that the inspections performed by Bristow Helicopters Ltd. performed on 25 AW189 helicopters produced no findings, nonetheless the AW189 TR pedal tube assy shares, for all intents and purposes, the same design of the AW139 TR pedal tube assy and it is potentially subject to the same of type of in-service loads, in this respect it cannot be ruled out that the pedal assy tube of the AW189 may experience similar damages as those found on some AW139 helicoptes, hence the Agency decision to extend the AD applicability to the AW189 models as well.**

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

2. **EASA disagrees: It is agreed that the most damaging conditions are associated to ground loads (e.g. brake applications) , for this reasons the proposed inspections intervals although expressed in flight hours account also for the number of landings performed per flight hour. The decision to express the AD inspections in terms of flight hours rather than in terms of landings is based also on the need to be consistent with the current AMPI GVI inspection (AMPI Data Module Code 67-05) of the tail rotor control linkages planned at 1 200 FH.**

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

