

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-026

[Published on 09 February 2026 and officially closed for comments on 09 March 2026]

Commenter 1: ABL Srl – Antonio Fiordelli – 10/02/2026

Comment # 1

Although the affected part analysis (Manufacturer P/N 500-32-2Y-H) discloses that the manufacturer should be 'Techtest Ltd.', confirmation of the OEMs (for both the life raft and the PLB) could help to refine the investigation and issue an early warning to our stakeholders.

EASA response:

Comment noted.

EASA thanks you for your comment and clarification, and although the scope of subject AD are PLBs installed on EC 175 helicopters, EASA confirms your concern that affected PLBs and/or battery pack (A02787) may also be installed in (life the rafts of) various other helicopters and/or fixed-wing aircraft. Therefore, we contacted, in coordination with EASA's ETSO-Approval section, CAA-UK, responsible for the design of the affected PLBs and battery, who offered to further investigate the issue on component level, considering the possible publication of an AD on equipment level for the PLBs from Techtest Ltd., having Manufacturer P/N 500-32-2Y.

Therefore, also pending possible further actions by the CAA-UK, no change has been made to the Final AD in response to this comment.

Commenter 2: HR Smith Group LTD – Stuart Taylor – 09/03/2026

Comment # 2

As the manufacturer of the Personal Locator Beacons (PLBs) referenced in EASA PAD 26-026, we wish to submit the following technical corrections to the "Reason" section of the Proposed Airworthiness Directive (PAD):



a. Correction Regarding Battery Discharge Claims:

The current draft states: "*Occurrences were reported where... discharged batteries of PLBs... were found.*"

Manufacturer Correction: Our internal quality and field service records show no notification of discharged batteries for PLBs installed on the H175 fleet. We request this reference be removed to prevent inaccurate maintenance assumptions regarding battery reliability. We believe this was based upon issues identified on the installation of the H160 aircrafts, not the H175.

b. Clarification of Failure Frequency:

The current draft states: "*...or where PLBs were found to be defective despite a functional battery.*"

Manufacturer Correction: There has been only a single instance of a 500-27Y claimed to be failing its Built-In Test (BIT) during scheduled maintenance. We have not received this article to confirm this report. This unit is currently in transit to AH to initiate an investigation with us. The use of plural "occurrences" and "units" overstates the frequency of the issue. For this reason, we feel that we should confirm the 500-27Y has an issue once it has been returned, prior to mixing the detail within the PAD that relates to two different products, with two different reported issues, one awaiting confirmation.

c. Proposed Amendment to AD Language:

We propose the previous AD that was raised for the H160 is modified and used for the H175.

While we support the one-time Operational Check (OPC) to ensure continued fleet confidence, we believe the AD should accurately reflect the isolated nature of the technical findings.

EASA response:

EASA partially agrees with your comments, and confirms that so far only one occurrence has been reported to us about a PLB in a EC 175 helicopter which was found defective despite a functional battery. However, taking regard of the occurrences reported about found discharged batteries of PLBs, fitted on emergency life-raft system(s) (ELRS) installed in H160 helicopters, and considering that the same PLBs are also installed in EC 175 helicopters, subject AD for EC 175 helicopters requires ‘accomplishment of a one-time operational check (OPC) of all possibly (also) affected PLBs, and applicable corrective action(s) when needed’, in accordance with the instructions of the by Airbus Helicopters published Alert Service Bulletin’.

Therefore, we have in respons to your comment slightly amended the Final AD the first paragraph in the ‘Reason’ section, referring now also to the H160. The published EASA AD for H160 helicopters, addressing the same possible unsafe condition, will not be amended, taking also in consideration, that ‘both ADs are considered to be an interim action, and further AD action may follow’, as stated in the last sentence of the ‘Reason’ of the ADs.

Please, also refer to EASA respons to Comment # 1.

