

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-051

Published on 17 April 2026 and officially closed for comments on 15 May 2026

Commenter 1: AERO TOYOTA CORPORATION – Mai Nakamura – 20/04/2026

Comment # 1

We would like to request a review and possible revision of the applicability criteria of the Proposed AD.

The PAD defines affected parts based on the nut retainer MP/N (360A27-2121-20 and 365A27-8193-20).

However, in practice:

- The nut retainer does not have a visible part number marking.
- The part number is not recorded in the servo-control log card.
- Therefore, it is not feasible to reliably determine applicability by physical inspection.
- As a result, operators may be required to perform unnecessary and impractical physical inspections to verify the presence of the nut retainer.

On the other hand, the original ASB defines applicability based on servo-control MP/N (SC8042 and SC8043), in combination with the specified nut retainer.

For example, the ASB applies to front and left main rotor servo controls, MP/N SC8042 (P/N 704A44831102), and right main rotor servo controls, MP/N SC8043 (P/N 704A44831103), provided that they are equipped with the specified nut retainer.

This indicates that applicability is primarily determined by servo-control MP/N, with the nut retainer as an additional condition.

Since the installation of the nut retainer is configuration-dependent and can be determined via servo-control MP/N and IPC, applicability based on servo-control MP/N would be more practical and traceable.

This may lead to ambiguity in compliance determination and inconsistent application of the AD.

Therefore, we kindly request that the AD applicability be clarified or revised to include servo-control MP/N as an alternative means of identification, consistent with ASB AS350-67-30-0002.



EASA response:

EASA (partially) agrees with your comment.

Although the applicability will not be changed, it has been decided to make in the final AD reference to the P/Ns of the various MR servo-controls in the definition of the 'Affected part(s)', referring to an added Appendix, listing the (Manufacturing) P/Ns of all the servo-controls, as applicable depending on helicopter model.

Commenter 2: NORDIC AVIATION CAMO & CONSULTING AS – Vincent Barelli Rey – 20/04/2026

Comment # 2

We've reviewed PAD 26-051 and found that the applicability may be improved by adding the P/N of affected servos.

Suggestion:

OLD statement

AS 350 B3 helicopters, all serial numbers (s/n);

AS 355 F, AS 355 F1, AS 355 F2, AS 355 N and AS 355 NP helicopters, all s/n; and

EC 130 B4 and EC 130 T2 helicopters, all s/n.

NEW statement

AS 350 B3 helicopters, all serial numbers (s/n) **and fitted with servos P/N 704A44831102 and/or 704A44831103**

AS 355 F, AS 355 F1, AS 355 F2, AS 355 N and AS 355 NP helicopters, all s/n **and fitted with servos P/N xxxx**

EC 130 B4 and EC 130 T2 helicopters, all s/n **and fitted with servos P/N xxxx.**

EASA response:

EASA (partially) agrees with your comment.

Please, refer to EASA respons to Comment # 1.



Commenter 3: Italfly – Alessandro Ferro – 20/04/2026**Comment # 3**

The TCH SB **ASB AS350-67-30-0002** Issue 001 2026-04-01 includes the following statement in the “Applicability” section:

APPLICABILITY		
Model:	AS350	
Version:	B3	
Components affected		
Designation	MP/N	P/N
Front and left main rotor servo-control	SC8042	704A44831102
Right main rotor servo-control	SC8043	704A44831103
This ASB is applicable to servo-control listed above that are equipped with a nut retainer MP/N 360A27-2121-20 or MP/N 365A27-8193-20.		

The PAD 26-051 seems not to include the reference to the installed servo-controls.

Would be possible to correct § (2) in order to add this reference?

Considering that the servo-control is a component usually recorded in the h/c logbook, while the nut retainer is not, this reference could help to easily identify the applicability or not of the AD.

EASA response:

EASA agrees with your comment.

Please, refer to EASA respons to Comment # 1.

