European Union Aviation Safety Agency

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-128

Published on 21 October 2026 and officially closed for comments on 18 November 2026

Commenter 1: Provincia Autonoma di Trento – Michele Fantin – 28/10/2026

Comment # 1

Reference

- **Helicopter Type: MBB-BK117 (H145 family)**
- **Document: ASB 25-23-0004**
- **EASA Reference: PAD 26-128**

Background and Operator Profile We are reviewing the requirements of ASB 25-23-0004, which mandates the complete removal of the Rescue Winch Safety Cable – Removal . Our organization extensively conducts Helicopter Hoist Operations (HHO).

A. **Operational Impact and Safety Concern** We strongly advise against the complete removal of these attachments for helicopters engaged in HHO. In our operational experience, the Rescue Winch Safety Cable is not a merely optional accessory; it is an essential safety component during the critical phase of boarding the hoistee. Specifically, these attachment points are crucial for:
    - Securing and controlling the hoistee during the transition from the hoist cable to the cabin floor.
    - Assisting the hoist operator in managing the pendulum effect or sudden aircraft movements during the recovery phase.
    - Preventing accidental falls or injuries to both the hoistee and the cabin crew during the final stages of the boarding sequence.

B. **The Safety Paradox** While we understand that ASB 25-23-0004 was likely issued to address a specific technical finding, its application on HHO-configured aircraft would paradoxically decrease overall flight and operational safety. Mitigating a technical risk by removing these attachment points directly introduces a severe operational hazard during hoisting maneuvers, leaving the crew without a vital safety restraint mechanism.

C. **5. Request for Alternative Action** Before elevating this PAD to a final Airworthiness Directive, we urgently request Airbus Helicopters and EASA to evaluate an Alternative Method of Compliance (AMOC) or a revised SB for HHO operators. Potential solutions could include:
    - Introducing a recurrent inspection program (NDT/Visual) instead of part removal.
    - Designing a reinforced/redesigned attachment point that solves the underlying technical issue while preserving its operational function.
    - Applying the removal mandate only to non-HHO configurations.

We remain at your disposal to share operational video footage or detailed safety reports to demonstrate the critical necessity of these attachments during hoisting operations.

An agency of the European Union

TE.CAP.00115-007 © European Union Aviation Safety Agency. All rights reserved. ISO9001 Certified.
Proprietary document. Copies are not controlled. Confirm revision status through the EASA-Internet/Intranet.

EASA response:

Comment not agreed.

Based on the currently available data, the corrective action required by this AD is considered necessary and only affects safety cable brackets installed on Operator Work Stations having a Manufacturer Part Number listed in this AD; safety cables installed at other locations are not affected and may continue in service. The removal of the affected part constitutes in itself a terminating action for the requirements of this AD.

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

An agency of the European Union

TE.CAP.00115-007 © European Union Aviation Safety Agency. All rights reserved. ISO9001 Certified.
Proprietary document. Copies are not controlled. Confirm revision status through the EASA-Internet/Intranet.