



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-052

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Commenter 1: Airbus Helicopters – Jon Simpson – 26/04/2017

Comment # 1

As a variant of the EC135 T3 model, the EC135 T3H variant falls within the AD definition of a “Group 2” helicopter owing to its Serial Number range of 2000 onwards and therefore having been delivered with the Teflon washer fitted from build. However the required inspection accomplishment for “Group 2” helicopters references paragraph 3.B.3 of ASB EC135-67A-031.

Please see attached IN 2125-I-00 (See “Reason for Revision 1:”) in which AHD specifies that this ASB is not relevant to “H” variants (in fact no SB using this nomenclature is applicable to the “H” variants which actually use EC135H-XX-XXX). To my mind, either the AD needs to reference some other maintenance data for the required inspection on “H” variants. Or if the inspection is not applicable to the “H” variants, exclude them by Serial Number range.

Although only a variant of the T3/P3 models by the addition of an STC, AHD is treating the “H” variants as if they were different models from a maintenance data perspective. As in this case, it has the potential to create a mismatch between a Type and Model related AD and its variant specific reference documentation. I have previously raised this issue with AHD.

EASA response:

Comment noted. EASA agrees that the ASB EC135-67A-031 is not applicable to EC135T3H. It should also be noted that the SB is not applicable to all Group 2 helicopters.

The AD does not expand the effectivity of the SB. The AD requires anyway to accomplish specific maintenance actions (e.g., the connection of the tail rotor control on a helicopter after its previous disconnection) using instructions that, to date, are only available in that SB.

It is expected that the applicable AMM will be updated including the content of the ASB, section 3.B.3; according to paragraph (6) of the AD, using that revised AMM will be acceptable to comply with the requirements of paragraph (5) of the AD.

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

