

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-021 [Published on the 23 March 12 and officially closed for comments on the 20 April 12]

Commenter 1: SAFRAN Turbomeca – Pierre COHERE – 13 April 2012

Comment # 1

Je suis à l'origine de cette demande et je relance car à mon sens une clarification ne coûte rien surtout que l'AD est un projet pour le moment. C'est une demande client qui souhaiterait que l'analyse soit plus simple.

J'ai mentionné dans mon rapport :

a. Question raised mainly on the Proposal AD :

The PAD wording is not so clear regarding the need to make the erosion check or not. This check is not simple to manage on 17 bases with only 2 tools available.

The PAD wording is the following : "Required as indicated, unless accomplished previously" when the SB mentioned : "Is the deadline for gas generator rotating assembly cleaning known and valid? "

Question brought again to Airworthiness Dept since the AD is just a proposal for the moment.

I think that to ease the understanding, we should take the SB wording within the AD.

Merci pour ton aide,""

EASA response:

EASA partially agrees with the commenter.

In response to this comment, in addition to the sentence "Required as indicated, unless accomplished previously:", paragraph (1) of the Required Action(s) and Compliance Time(s) has been modified to give credit to some actions accomplished in accordance with the instructions of Turboméca MSB A292 72 0230 Issue 1.

Commenter 2: Noordzee Helikopters Vlaanderen (NHV) N.V. – Kevin Matton – 27 March 2012**Comment # 2**

“Dear,

After reading the PAD I have some questions regarding the applicability.

When you read the AD and the engine is operated in normal or not dusty condition, you need to do the inspection at intervals as described in the maintenance manual of the engine.

But when you read the SB, it says the SB is ONLY applicable for engines operated in dusty conditions. So not applicable in the other cases. The combination AD/SB is somewhat confusing.

Kind regards

”

EASA response:

EASA agrees with the commenter.

In response to this comment, for engines which do not operate, and has never been operated, in dust laden atmosphere, the requirement to inspect the engine at the next scheduled maintenance, as defined in the applicable Maintenance Manual has been deleted in the AD.

Commenter 3:FAA – Rose Len – 23.04.12**Comment # 1**

The only comments I have at this time is on the referenced SB_A292_72_0230_FR_C. There is a requirement in the SB for a pilot to help assess the amount of dust that the engine may have been exposed to. I have been instructed by our legal that we cannot include any pilot involvement in the AD unless the pilot instructions are included in the aircraft flight manual (AFM). The reasons are two-fold: 1) If the pilot makes a mistake in implementing the instructions when there are no instructions in their manual, then they cannot be held accountable, and 2) If the pilot performs a task that isn't in the AFM, then they may be subject to disciplinary action.

EASA response:

Comment is acknowledged and understood, but EASA disagrees. This AD implicitly requires operators to monitor the helicopter/engine operating conditions, thus implying collecting feedback from the pilot(s). This AD however does not require to add specific instructions in the AFM.

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