


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 12-112 [Published on 21 August 2012 and officially closed for comments on 18 September 2012]</p>

**Commenter 1: Company name – commenter's name – date**

**Comment # 1**

We as a maintenance organisation are also responsible of a part of the airworthiness.

We performed the EASA AD 2012-0084 a few weeks ago. Right now this affected helicopter is in the maintenance and at the same time we performed the ASB AS332-25.02.49 **Rev. 01** published by Eurocopter.

Now EASA published this PAD 12-112 with exactly the same content. I really do not understand the philosophy from EASA.

Why it is necessary to prepare a new AD instead of revise the old one (EASA AD 2012-0084) and for which reason is in the Ref. Publications the following sentence:  
The use of later approved revisions of these documents is acceptable for compliance with the requirements of this AD.

We all the time have so much paper work to do that we hardly find time to perform the essential work.

**EASA response:**

**Comments understood. Please note that the 'Reason' section of the AD explains that** "Since issuance of EASA AD 2012-0084, it was discovered that a weld bead was missing on another part of the rear beam". **For that reason, the ASB have been revised and the inspection requirements thereof expanded to take this into account. Although the new AD has almost similar wording in comparison of the previous one, it refers to the revised ASB, which require additional requirements (i.e. inspection procedure improved and new seat areas to be checked).**

**EASA AD policy indicates that if there are new, more restrictive, or additional requirements, we cannot require those by AD revision, only by supersedure, i.e. a new AD replacing the existing AD.**

**The standard sentence that "use of later approved revisions of these documents is acceptable" does not mean that the use of the latest revision is required, only that it is allowed. When an SB (for which an AD has been issued) is revised and substantially conflicts with the existing AD (e.g. change in Applicability, compliance time), further AD action will likely be necessary. If the revised SB is not conflicting, the sentence means that no AMOC approval is necessary to allow the use of the technical instructions of that revised SB to comply with the AD.**

**Nevertheless, the new AD also states that the actions as "Required as indicated, unless accomplished previously", which means that, in case the ASB has been already accomplished at Revision 1 (as the commenter indicates he has), that constitutes compliance with the AD and no further maintenance action would be required.**

**Some changes for further clarifying the Reasons of the new AD have been made to the Final AD in response to this comment.**