


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-024</p> <p>[Published on 27 January 2014 and officially closed for comments on 24 February 2014]</p>

Commenter 1: Heli-One (Norway) AS – Øyvind Øglænd – 28.01.14

Comment # 1

With reference to the above PAD published on your site, attached is a couple of service Letters and Service Bulletins from Heli-One Norway addressing the same issues, and providing the story behind them.

Start with reading 2560-014, which refers to the older ones. 2560-003 informs of the drop test failures.

I do not know how much Airbus Helicopters has reported to EASA, but the issues they face on their installations are correctly described in the PAD.

During investigations on the reason for the transmit failures described in the attached documents (/SL's 2560-003 and 2560-014)), Techtest (H.R. Smith) concluded that during their development testing the beacons were dropped on soft ground, not hard ground as required by the TSO.

The final conclusion is that the actions of this PAD is actually incorrect. By reverting to beacon being MOD 3 or older, you change into a beacon configuration that may not be iaw the TSO and thus may fail on impact with the ground. You are replacing one potential unsafe condition with another!

The issues described by Airbus Helicopters is peculiar to their installations, and it is their installations that should be changed to accommodate the Mod 4 and 5 beacon as they are the latest and greatest beacon version, not the beacons themselves!

That being said, H.R. Smith has been working very quietly with this, obviously not informing the market nor the authorities. However the issues with the bacon drop tests and the failing versus the TSO, was indeed known by the Norwegian CAA at the time.

Attached is a couple of SB's issued by ourselves following an inadvertent release of the beacon (2560-058), and subsequent finding related to some of our installations (2560-062).

The case referred to in SB 2560-058, was determined to be caused by loss of torque on the mounting bolt of the CPI beacon. The feedback from complying with the SB revealed only one case of very similar loss of torque; The same aircraft on the same base where the initial CPI release occurred! This was brought to the attention of the operator, actions were taken, the problem has not resurfaced, concluding maintenance error was the "real cause", not the installation designed configuration.

Based on the above, we conclude, as indicated in our Service Letter 2560-13, that the issues addressed in the PAD, although very relevant, does not affect our installation and as such is not affected by the PAD, which correctly addresses the specific Airbus Helicopter designed installations.

We'll be happy to provide any more information to this and answer any questions you may have In this issue. It's a long story.



2560_003



2560_014



AHSB-2560-058



AHSB-2560-065

EASA response:

EASA partially agree.

It is true that the PAD aimed at specifically addressing Airbus Helicopter approved installations, for which ELT units P/N CPI 503-16 MOD 4 and MOD 5 are not certified and appeared to be incompatible as replacement parts for the reason explained in the PAD (i.e. overlapping of two gasket layers that could cause partial plugging of the ELT unit in its connector and allow moisture to enter into the connector). We have amended the Applicability of the Final AD to clarify that it applies to specific Airbus Helicopter ELT installations only.

However, EASA disagree with the commenter's statement that re-installation of originally approved ELT MOD 3 would introduce another Unsafe Condition relating to beacon CPI 503 series drop testing issue that was raised several years ago. For this particular issue, relevant to Beacon P/N 503-16 MOD 0, 1, 2 and 3, and P/N 503-16LMD MOD 0, 1, 2 and 3, EASA deemed that the ELT drop testing matter did not trigger the Part21 criteria for Unsafe Condition, and consequently issued EASA SIB No.2010-22 to recommend limited deployment altitude (see EASA AD website at <http://ad.easa.europa.eu/ad/2010-22>).