

<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 14-038</b> <b>[Published on 13 February 2014 and officially closed for comments on 13 March 2014]</b>

**Commenter 1: Helispot – Johan Vandenbussche – 13/02/2014**

**Comment # 1**

We have read the proposal for AD ref 14-038. We have the following remarks:

1. Given we the number of documented fatalities related to post-crash fires with Robinson R22 and R44 helicopters;
2. Given the fact that Robinson has been issuing SB's for the R44 since many years to address the dangerous situation and at the same time has been discounting the bladder tanks;
3. Given the fact that Robinson has recently (Jan 2014) issued a SD for the R22 related to the bladder tanks;

We would recommend the following:

- a. To reduce the enforcement of the AD for the Robinson R44 from 24 to 12 months after March 14, 2014.
- b. [To] include the R22 helicopter in the AD with an enforcement of 24 months after March 14, 2014.

This two recommendations will certainly reduce the risk related to the aluminium tanks in the Robinson R22 and R44 helicopters.

***EASA response: Partially agreed.***

***Although we recognize that the bladder tanks are likely to increase the safety of the R22 as well, the Agency has not determined at this date that occurrences on the R22 raise to the level of an Unsafe Condition in accordance with Commission Regulation (EU) No 748/2012, Annex I, paragraph 21.A.3.***

***The proposed compliance time has been determined based on current penetration of the Service Bulletin and the corresponding risk to the fleet.***

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

**Commenter 2: LARS Helicopter Center – Pawel Grupa – 05/03/2014**

**Comment # 2**

We are a Maintenance Organisation for Robinson Helicopters in Poland.(PL.MG.506, PL.145.046). We would like to share with you our point of view in this matter. In our humble opinion it is very unfair that owners of Robinson Helicopters are being forced to replace fuel tanks during "life time" of a helicopter.

First of all, replacing fuel tanks is very expensive. We must not forget that the owners would have to cover all the costs. Not the manufacturer. We understand that safety is the most important matter in aviation, but everyone who enters a plane or a helicopter takes a risk and everyone is aware of that risk.

We are 99% sure that sooner or later fuel tanks would have to be replaced. We, and all our clients, would be satisfied if the new AD gave the chance to finish the 12 years or 2200 hours life time of helicopter. Then, during overhaul, changing fuel tanks for new type tanks would make sense. Not sooner.

How can we explain our clients, whose Robinsons has 3 years until 12 years life limit, that they must invest a significant amount of money just before the end of "life time". What then? After overhaul of a R44 helicopter new bladder fuel tanks would have 3 years less than the whole plane? It really doesn't make any sense.

The new AD in this form will complicate functioning of Robinson helicopters in Europe for the next couple years for sure.

***EASA response: Disagreed.***

***While it is understood that a cost is associated, it has been determined that an Unsafe Condition exists requiring bladder tank retrofit during the "life time" of the helicopter. The proposed compliance time is based on current penetration of the Service Bulletin and the corresponding risk to the fleet. Please note that the fuel bladders do not require replacement after 12 years. They only require replacement on condition.***

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