U.S. Department of Transportation

Aviation Safety

Federal Aviation Administration

In Reply, Refer To:731-23-00206

June 20, 2023

Mr. James Morphew Technical Representative EC135/145 Airbus Helicopters Inc. 2701 Forum Drive Grand Prairie, TX 75052-7099

## Subject: Alternative Method of Compliance (AMOC) to Airworthiness Directive (AD) 2016-01-14, Paragraph (e)(2): 12-month interval inspection and request to incorporate inspection tolerance.

Dear Mr. Morphew:

The Federal Aviation Administration (FAA) reviewed your revised email letter dated March 3, 2023, which proposes an AMOC to Paragraph (e)(2) of AD 2016-01-14 for Airbus Helicopter models MBB-BK 117 A-1, MBB-BK 117 A-3, MBB-BK 117 A-4, MBB-BK 117 B-1, MBB-BK 117 B-2, MBB-BK 117 C-1, and MBB-BK 117 C-2, all serial numbers after implementation of Airbus Alert Service Bulletin ASB MBB-BK117-60A-126 Rev. 0 and ASB MBB-BK117-76A-005 Rev. 0 as applicable.

Your revised letter maintains your request for relief from the compliance time of the repetitive 12month inspection interval of the N2 control arm as mandated in the referenced AD, since this 12month repetitive inspection is now incorporated into the maintenance manual of the applicable helicopter models. In addition, your letter requests authorization to include a 3-month tolerance to the 12-month repetitive inspection that is identified in the Aircraft Maintenance Manual/Master Servicing Manual.

The FAA International Validation Branch maintains its position to deny your AMOC proposal to AD 2016-01-14, P aragraph (e)(2). Inspection intervals called out in an aircraft maintenance manual for U.S. operators are not enforceable and as such, do not provide an acceptable level of safety to the referenced AD requirement. However, your request to add a 3-month tolerance to the 12-month repetitive inspection is approved. This approval is based on an email acknowledgement of acceptance from Airbus representative Stefan Denteler dated June 15, 2023, as well as a statement of acceptance identified in EASA AD 2013-0154, Required Actions, Paragraph 1: *"Note: A non-cumulative tolerance of 3 months can be applied for the initial inspection on helicopters with less than 2 years from the date of first flight and for the repetitive inspections required by paragraph (1) of this AD."* 

1701 Columbia Avenue College Park, Georgia 20227 In accordance with FAA Order 8110.103B, the following limitations and conditions apply to this AMOC:

The approved +/- 3-month tolerance to the repetitive 12-month inspection of N2 control arm is non-cumulative; any remaining time from the tolerance interval shall not be applied to the follow-on repetitive inspections.

The previous FAA AMOC response letter, Response Number 731-23-000146, dated June 8, 2023 is no longer applicable.

This FAA AMOC is transferable with the aircraft to an operator that operates the aircraft under the U.S. registry.

Before using this AMOC approval, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local Flight Standards District Office / Certificate Holding District Office.

The preceding paragraph also applies to any applicable foreign-registered aircraft upon transfer of the aircraft to the U.S. registry if compliance with this approval has not been accomplished.

All provisions of AD 2016-01-14 that are not specifically referenced above remain fully applicable and must be complied with accordingly.

The FAA's International Validation Branch will revoke this AMOC approval if it later determines that this approval does not provide an acceptable level of safety.

This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as a AMOC to any AD issued by another civil aviation authority (CAA). Approval of a AMOC to another CAA's AD must come from that CAA.

If you have any questions or need additional information, please contact this office or Gregory Davison via electronic mail: Gregory.Davison@faa.gov.

Sincerely,

for Anthony Gallo Manager, International Validation Branch Compliance & Airworthiness Division Aircraft Certification Service

cc: