

Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; -Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	Collins Aerospace, Hoist & Winch	-	1	Document states “The overload clutch of the hoist presented for certification is subject to EASA AD 2015-0226R5 stemming from the investigation on an in-service event where a failure of the rescue hoist slip clutch allowed the hoist cable to reel-out in an uncontrolled manner.”	It has never been determined that the overload clutch failed, only that the load exceeded the minimum slip load. This excessive load could have been caused by exceedance of the allowable flight envelope. It should be noted that definition of the flight envelope is required per this deviation. Collins proposes that if flight envelope be defined and the clutch is tested regularly, then hoists should be able to return to full load rating.	Requested	Not Accepted	During a maintenance check flight with an MBB-BK117 C-2 helicopter, a dummy load of 552 lb (250 kg) was picked up in order to conduct a “maximum load cycle” on the rescue hoist. The cable reeled-out without further command of the operator, causing the test dummy load to impact the ground. The results of further examinations on the subject hoist determined that the overload clutch had failed. According to the reported description of the event, the helicopter was moving gently. Despite this, the exceedance of the allowable flight envelope was retained as a potential contributor to the event, but it is considered very unlikely to be the root cause of this occurrence. Concerning the possibility for the affected hoists to return to full load rating, the deviation does not constrain the applicant to establish load limitations provided that compliance with the essential requirements is demonstrated. With the current design, regular testing of the overload protection device alone is not considered enough to comply with the essential requirements with a full load rating.
2	Collins Aerospace, Hoist & Winch	1	4	There are no hoists currently in service that are identical to the hoist that had the uncommanded reel out. All hoists have upgraded (or pop 2 clutches) and are tested every 6 months per the ASB 44301-10-18, rev 6.	Modify the AD to recognise this fact and extend the clutch MRO to 10 years with regular FLCT checks. If the hoist is checked per AD ASB 44301-10-18, rev 6, and it fails take it out of service until repaired.	Requested	Not Accepted	The AD is not subject to this consultation.
3	Collins Aerospace, Hoist & Winch	2	4		Allow all rotorcraft to apply for this deviation, not just newly certified aircraft.	Requested	Noted	This deviation was initially developed to address a specific application for use of this hoist on some newly manufactured aircraft for which a design fully compliant with CS-29 Amdt. 8 was not available. This deviation may be proposed by an applicant for use in similar circumstances pending the availability of a fully compliant hoist installation. The proposed wording of the deviation action item number 5 will be simplified accordingly.
4	Collins Aerospace, Hoist & Winch	3	4		All risks are mitigated today with scheduled testing of the overload protection device every 6 months IAW ASB 44301-10-18, rev 6, and being included in hoist CMM maintenance schedule at next rev.	Requested	Not Accepted	Provisions of Part 21 for Continued Airworthiness are different from provisions for Initial Airworthiness certification and provisions sufficient to restore an acceptable level of safety for an in-service reported unsafe condition may be not sufficient to grant a new airworthiness certification approval. In particular, it has been determined that full compliance with all elements of the identified certification requirements in the deviation cannot be demonstrated by a regular testing of the overload protection device only. The deviation defines additional provisions for the proposed design to meet the intent of the affected essential requirements.

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5	Collins Aerospace, Hoist & Winch	4	4	There are no risks that have not been already mitigated by the current 6 month checks, no hoists have been found to fail this in service test	Extend Clutch MRO time back to previously certified 10 year, as per most other regulatory agencies (FAA) Maintain 6 month FLCT checks to ensure clutch functions within design limits. It should be noted that no matter the TBO, all clutches are always replaced as part of the overhaul and then a full test completed prior to returning to the customer.	Requested	Not Accepted	See comment 2 and 4 above.
6	Collins Aerospace, Hoist & Winch	5	4	Why does this only apply to ‘newly manufactured rotorcraft’	Enable the deviation to be applied for by existing type certified rotorcraft currently in service using Collins hoists as listed	Requested	Noted	See comment 3.
7	Transport Canada (TC)			EASA has not specifically stated that the compliance concerns are related to application for new Type Certification, or a ‘significant’ Change to a Type Design requiring compliance to CS-29 Amdt 8.	A clear applicability statement to ensure clarity for compliance concern.	Recommended	Noted	This deviation was initially developed to address a specific application for use of this hoist on some newly manufactured aircraft for which a design fully compliant with CS-29 Amdt. 8 was not available. This deviation may be proposed by an applicant for use in similar circumstances pending the availability of a fully compliant hoist installation. Similar considerations are not unique with respect to Amdt. 8 of CS-29 and may be extended to rotorcraft with a different certification basis on a case by case basis.
8	Transport Canada (TC)			The current structure and wording of the deviation does not specifically mention that any issues concerning the Collins Aerospace ‘Population 2’ Hoist System on existing certified Rotorcraft have already been managed and addressed via Continuing Airworthiness Process with the release of mentioned EASA AD, with those installations being considered airworthy.	Include an additional sentence in paragraph 2 in Identification of Issue section. <i>“Installation of Collins Aerospace ‘Population 2’ Hoist System on previously Certified Rotorcraft, are subject to the corrective actions mentioned in EASA AD 2015-0226R5, and are considered airworthy. No further actions required related to compliance to CS29 Amdt 8 for Certified Rotorcraft”</i>	Recommended	Partially Accepted	The following sentence will be added: <i>Installations of Collins Aerospace „Population 2“ Hoist System on previously certified rotorcraft are subject to the provisions of Part 21.A.3B and to the corrective actions mandated by EASA AD 2015-0226R5. They are considered to meet an acceptable level of safety in-service according to the continued airworthiness process and are not subject to this deviation.</i>
9	Bell	Paragraph 1	2	The reasons for the non-compliance are not apparent. The POP 2 hoists have the additional controls to ensure clutch integrity to comply with 29.1301 and 29.1309.	EASA are requested to clarify the perceived non-compliances to the quoted CS29 requirements.	Requested	Noted	In the project that gave rise to this deviation, full compliance with all elements of the identified CS-29 certification requirements could not be demonstrated, for which reason the present deviation has been proposed. As this concerns design specific issues that may also differ between hoist part numbers and rotorcraft installations to which these part numbers apply, the applicant is responsible for identifying non-compliances peculiar to their design if they propose to use the deviation.
10	Bell	1.3.1	3	“hazardous” is quoted without indication as to what aspects are hazardous.	EASA are requested to clarify the aspects of the Collins hoist they feel are hazardous.	Requested	Noted	See comment 9.

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11	Bell	Point 5	4	If the installation is certified for one installation is should be airworthy for many installations.	EASA to explain the rationale for limiting the number of installations if the installation has been deemed as airworthy.	Requested	Partially Accepted	According to § 1.3.3 of Annex II to Regulation (EU) 2018/1139, “due allowance must be made for the size and broad configuration of the aircraft” in order to accept systems, whose single failures having potential catastrophic effects are not shown to be extremely improbable. Thus, it is possible for the Agency to accept certain system designs where a single failure may have catastrophic effects under some circumstances and with due regard to the overall safety risk and risk exposure mitigation. Considering that limiting the number of aircraft to which the deviation apply is only one of the possible mitigations to reduce risk exposure pending the availability of a fully compliant hoist installation, “Action Item number 5” will be reformulated in a more general way.

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