ecms Aviation Systems GmbH	Information concerning the withdrawal of EASA PAD 15-117	Document Reference 010030217INT

Dear Sir or Madam, valued customer or business partner

In September 2015, EASA (European Aviation Safety Agency) published a proposed airworthiness directive, drastically changing the requirements for personnel carrying device systems (PCDS) in conjunction with human external cargo on helicopters.
These changes would have made certain aspects easier. But equally, it would have introduced complications in other areas.

Due to numerous comments from the industry, this proposal was withdrawn in April of 2016.
At this point, it is important to understand that solely the proposed airworthiness directive was withdrawn; the underlying law concerning certification and operation of aerospace products remains untouched. In particular, the certification specifications for helicopters, CS27 and CS29, are, of course, still in effect.

Section 865 (c) (2) is of particular interest in this context:
"For rotorcraft load combinations to be used for human external cargo applications, the rotorcraft must: (…) Have a reliable, **approved (meaning: airworthiness approved!)** personnel carrying device system"

Additionally, the often-quoted certification memorandum CM-CS-005 remains valid. This CM however only represents one possible way of certification.
This means that systems enabling the carriage of human external cargo will continue to require an aeronautical certification.

In this context, "the system" includes all the components from an approved attachment point on the helicopter via different connecting elements all the way to the personnel harness.
Such an approval can be obtained by an EASA-certified design organisation with the appropriate privileges. ecms is such an organisation. We already have a variety of such systems on the market; we are, however, able to fulfil special requests.

The information presented here is based on a direct conversation, requested by the authority, which took place between ecms Aviation Systems and EASA's experts in Cologne, Germany.

With best regards,

Matthias Schuster, CEO