

Alternative Means of Compliance



Flight data Recorder installed on Leonardo (LH) AW139 and Airbus Helicopters (AH) H160-B and MBB BK117D-3 helicopters

AltMoC No. IT-OPS-2023-001 Rev.2 – 20 December 2024

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC in accordance with Reg. (EU) 965/2012, para. ARO.GEN.120(e).

Regulatory reference:	
Regulation (EU) 965/2012, Annex IV	
Rule paragraph(s)	CAT.IDE.H.190

List of Effective Pages:		
Page number	Revision number	Revision date
1	Rev. 2	20 December 2024
2	Rev. 2	20 December 2024
3	Rev. 2	20 December 2024

Ente Nazionale per l'Aviazione Civile (ENAC) contacts for this AltMoC	
ENAC Department	Direzione Navigabilità e Operazioni (ONO)
Contact details (email)	operazioni.volo@enac.gov.it protocollo@pec.enac.gov.it

1	<i>Full description of the AltMoC, which includes reasoning of the AltMoC</i>
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Leonardo Helicopters and Airbus Helicopters advised that helicopter models AW139 (LHD), H160-B, EC175 and MBB BK117D-3, delivered starting by January 2023, are not fully compliant to AMC1.2 CAT.IDE.H.190, being the sampling rate of some parameters compliant with the standard ED-112 MOPS but not with ED-112A. Furthermore, some models are not compliant due to the parameter “helicopter computed weight” not recorded.

All the affected helicopter models are featured with parameter recording systems or cockpit video recording systems that are additional if compared to those required, so to facilitate investigation in case of any occurrence.

There are no recommendations prompted by Agenzia Nazionale per la Sicurezza del Volo (ANSV) addressing to the abovementioned sampling rates or “helicopter computed weight” recording.

This Alternative Mean of Compliance allows national CAT operators to put in service brand-new helicopters AH H160-B and MBB BK117D-3, and LHD AW139.

In accordance with Leonardo and Airbus helicopter’s manufacturers, with whom ENAC carried out a consultation (*Ref. Leonardo Helicopters letter n. AIRW/24/056 dated 17.12.2024 and Airbus letter 2024-ETJ-536 dated 20.12.2024*), the new compliance date cannot be planned before mid-year 2025 due to spare parts availability, training and/or other issues. For this reason ENAC issues the present revision n.2 of the alternative mean of compliance to AMC 1.2 CAT.IDE.H.190 in order to extend the validity up to 30.09.2025, for all the affected helicopter models.

2	<i>Assessment demonstrating that the IR(s) are met</i>
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Following consultation held among ENAC specialists, helicopter’s manufacturers and EASA, this measure is deemed to imply a condition of risk that is negligible in terms of safety.

To further substantiate this, it has to be noted that no retroactive measure is required and/or forecasted by EASA on helicopters first issued with an individual CofA before 01/01/2023.

Any discrepancies with AMC1.2 CAT.IDE.H.190 do not affect compliance to point CAT.IDE.H.190 of EU0965/2012 regulation, whose provisions are satisfied in any case.

3 *Regulatory wording of the used AltMoC*

AltMoC wording is the following:

AltMoC1 CAT.IDE.H.190 Operational Requirements for helicopters having a MCTOM of more than 3175Kg and first issued with an individual CofA on or after 01 January 2023 (applicable only to Airbus Helicopters H160-B and to Leonardo AW139).

- a) provisions of AMC1 CAT.IDE.H.190 Flight Data Recorder are applicable;
- b) further recording and video-recording capabilities present on the helicopters at time of first individual certification shall remain operative, unless differently stated by approved MEL documents.

The approval of this AltMoC has limited validity, up to 30.09.2025.