

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0093

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Commenter 1: Delta Air Lines – Elijah Weinstein & Stephen Hill – 20/05/2025

Comment # 1

Reference:

- (A) EASA Airworthiness Directive: 2025-0093, dated 24 Apr 25
- (B) EASA Airworthiness Directive: 2024-0188, dated 27 Sep 24
- (C) Alert Operators Transmission (AOT) A32P031-24 Rev 04, dated 11 Mar 25

Comment #1.1.

Commenter Request

Delete Paragraph (4) Reporting

Request justification

Reporting should be omitted from this AD for two reasons:

1. A final solution has already been selected as acknowledged by Ref (A) in the “Not affected part” definition. Since a final fix is selected Airbus does not need to collect additional data to inform the root cause analysis or solution selection.
2. There is not a list of discrepant S/Ns therefor Airbus does not need to keep track of a discrepant parts pool.

DAL does not see that AD mandatory reporting provides an enhanced level of safety with regards to the increased NLG friction condition.

DAL understands Airbus may want operators to continue reporting to assist with the tracking of spare parts or simply on a ‘good to know’ basis. But since it does not provide an enhanced level of safety it should not be mandated by the Airworthiness Directive.

List paragraphs that change; describe (nonobvious) changes

Delete Paragraph (4) Reporting



Comment #1.2.Commenter Request

Clarify what portions of the Ref (C) AOT are required for compliance with the AD.

Request justification

The AOT Ref (C) shows parts 5.4, 5.5 and 5.6 as required for compliance. Specifically including the flow chart at the start of 5.6. The Ref (A) AD uses specific language to “accomplish a steering check of the affected part, in accordance with the instructions of the AOT” and “accomplish the applicable corrective action(s) in accordance with the instructions of the AOT.” DAL notes the AD language is specific to ‘the steering check’ and the ‘corrective actions’ parts of the AOT. DAL interprets this to mean only those portions of the AOT are required for compliance with the AOT. Specifically, this means that the flow chart at the start of 5.6 is not required for compliance.

DAL has two main concerns with the flow chart:

1. “Was the NLG secondary seal activated due to leakage of the primary seal”

This question cannot be reliably answered since the mechanic inspecting the NLG will have no knowledge of why the seal was changed, it could have been done per this AOT or due to a leak or some other reason. Tying this question to AD compliance is setting up operators for failure. If the flow chart is required for compliance with the AD, this question needs a procedure that can be used to determine why the seal was changed.

2. “Within the compliance time of this AOT, Replace the NLG Shock Absorber Dynamic seals as per MP Task A350-A-32-21-73-00001-921A-A”

The AOT does not define a compliance time for this requirement. If this part is required for compliance within the AD, the AD needs to define the compliance time.

List paragraphs that change; describe (nonobvious) changes

If DALs interpretation is correct and the flow chart is not required for compliance with the AD, no change is required, only a response to this comment.

If DALs interpretation is not correct, retrieve a procedure for determining why the secondary seal was active/to check for leaks in the primary seal and make it part of the AD. Additionally add a paragraph to define the compliance time for seal replacement if the secondary seal was activated due to a leak of the primary seal.

EASA response:

Comment #1.1. Comment not agreed. Reporting is still deemed a necessary requirement as it allows Airbus to determine the severity of the in service findings and then assess if adjustments to the inspection requirements may be necessary (e.g. inspection interval).

To be noted that reporting is required only in case of findings (while EASA AD 2024-0188 required reporting also of no findings).

Finally, please note that no terminating action is available yet: while it is confirmed that certain parts are not affected, no instructions have been published to retrofit those parts on a/c having affected parts installed.



Comment #1.2.1 Comment not agreed.

As a general comment, please note that in the EASA system the “RC marking” is not implemented. The AD must be read and implemented exactly as written. Specifically to your questions, as a clarification, please note that: the whole flow chart is to be adhered to. This aspect is considered covered by the AD verbiage addressing “corrective action(s)”. Any operator is expected to be able to assess by means of maintenance record review whether any prior secondary seal activation was performed due to primary seal leakage or any other reason, hence is expected to be in the position to reply to the question of concern in the flow chart.

Comment #1.2.2 Comment not agreed. The “within the compliance time of this AD part” is to be understood as referring to the compliance times indicated in the AD and in the AOT, paragraph 5.1.

Specifically to the question above, replacement of the dynamic seal must be accomplished, as applicable, within the compliance time as defined for the initial steering check.

No changes have been made to the Final AD in response to these comments.

