

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0096

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**Commenter 1: Azul Linhas Aéreas Brasileiras – Jonas Andrade – 15/05/2025**

### Comment # 1

Please, confirm if NOTE 2 on item REPLACEMENT could be interpreted as “If accumulated FH and FC of an **HPV CLIP INSTALLATION** are unknown, option B has to be used.”

#### Replacement:

- (4) For Group 1 aeroplanes: Within the compliance time defined in Table 1 of this AD, and, thereafter, at intervals not to exceed 4 000 FH or 2 000 FC, whichever occurs first, replace each affected HPV clip in accordance with the instruction of the AOT.

Compliance Time, A or B, whichever occurs later	
<b>A</b>	Before exceeding 4 000 FH or 2 000 FC, whichever occurs first, since affected HPV clip installation.
<b>B</b>	Within 2 500 FH or 1 250 FC, whichever occurs first, from the effective date of this AD.

Note 2: If accumulated FH and FC of an  are unknown, option **B** has to be used.

#### Terminating Action:

- (5) For Group 1 aeroplanes: Replacement on an aeroplane of each affected HPV with a non-affected HPV, accomplished in accordance with the instructions of the SB, constitutes terminating action for paragraph (4) of this AD. After that modification, it is allowed to remove the AFM TR and the MMEL update as required by paragraphs (1) and (3) of this AD, as applicable, for that aeroplane.

**EASA response:****Comment noted.**

***“HPV” should not be interpreted as “HPV clip” installation date. The initial inspection and corresponding actions focus on the clip itself, using the date of the most recent clip replacement as the time reference. If the date of the last clip replacement is unavailable, the next step is to assess the age of the HPV. According to [AOT 00], “If the clip was never replaced, the total HPV flight hours since new shall be used.”***

***In cases where the flight hours or cycles (FH/FC) of the HPV are unknown, the conservative approach is to apply the compliance time (option B in the AD) rather than using the aircraft’s FH/FC. This is necessary because it is possible for an HPV to be installed that is older than the aircraft itself.***

***No change was made to the final AD in response to this comment.***

