

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0099

[Published on 30 April 2025 and officially closed for comments on 07 May 2025]

Commenter 1: Scandinavian Airlines System - Thang Duong – 07/05/2025

Comment # 1

SAS would like to ask EASA for clarification regarding Table 1 of AD 2025-0099 Rev 00.

AD states in Table 1 of §2: “Close to”.

What is the definition of this wording?

The wording can be perceived differently depending on the person performing the work.

Table 1

Hydraulic leak location	Affected FCRM – type 2
Hydraulic leak <u>close to</u> Servocontrol functional item number (FIN) 1CY	FCRM FIN 201CY and FCRM FIN 202CY
Hydraulic leak <u>close to</u> Servocontrol FIN 2CY	FCRM FIN 202CY
Hydraulic leak <u>from</u> Servocontrol FIN 1CY	FCRM FIN 202CY
Hydraulic leak <u>close to</u> Servocontrol FIN 1CT1	FCRM FIN 201CT1
Hydraulic leak <u>close to</u> Servocontrol FIN 1CT2	FCRM FIN 201CT2

EASA response:

Comment noted: “Close to” must be read as any hydraulic leakage which could have potentially led to a contamination of the related affected FCRM. There is no plan to include a definition of “close to” in the AD, nor a list of parts, as it could eventually be misleading.

Operators can contact Airbus in case of doubt.



No changes have been made to the Final AD in response to this comment.

Commenter 2: Delta Airlines - Cecilia Teeuwen – 08/05/2025

Comment # 2

DAL has the following three comments/questions to this EASA AD, we hope you can clarify.

A. EASA AD Paragraph (2) and Paragraph (4) require to replace affected FCRM(s)... in accordance with the instructions of the AOT.

- o DAL Request: Can you confirm that only the “RC” Sections, (5.1) and (5.6) accordingly, in this AOT, are required for compliance with the replacement requirement?

B. AOT RC Section 5.6 requires to remove and install the Rudder and Elevator FCRMs using the wording: “refer to Ref. X”

- o DAL Request: Can you confirm that the RC requirement is to “remove and install the corresponding FCRM(s)” and that the removal/installation can be accomplished using the “refer to” language which allows “the operator to use Ref X or any alternative procedure accepted by his/her local authority”.

C. EASA AD Paragraph (2) Table 1 does not include a definition for “close to”.

- o Airbus provided the following definition of “close to” in their webinar presented this week:

close to: any hydraulic leakage which could have potentially led to a contamination of the related affected FCRM

- o Using this definition by Airbus, would the following satisfy the EASA AD requirements when determining hydraulic leaks “close to” servocontrols?: “if there was a leak in the area and it did contaminate the FCRM, then the leak was “close to” the Servocontrol” .
- o DAL Request: Can you confirm using this definition/determination of “close to” is appropriate and if not how to define “close to”?

EASA response:

Question A

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:



- *Section 5.1 defines the compliance time; actually, the compliance time as defined in the AD must be taken into account from a regulatory point of view (see also definition of “affected FCRM Type 2” in the AD).*
- *Section 5.6: DAL understanding is correct*
- *The AD has a direct reference to section 5.4.1, 5.4.2 and 5.4.3 of the AOT. Deviations from the instructions defined in those section must be therefore managed using the AMOC process.*

Question B: EASA agrees that the “refer to” allows “the operator to use Ref X or any alternative procedure accepted by his/her local authority”

Question C: EASA does not agree. When a leak could have potentially contaminated the part, the part must be replaced (Even if there is no clear evidence that the leak actually contaminated an FCRM). At present, there is not an approved procedure to determine whether an FCRM has been actually contaminated. In doubt, operators should contact Airbus for confirmation of their assessments.

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

