

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0166

[Published on 30 July 2025 and officially closed for comments on 27 August 2025]

Commenter 1: Swiss International Air Lines Ltd. – Vanessa Rohr – 25/07/2025, 30/07/2025 & 04/08/2025

Comment #1

Comment A

SWR is confused about newly published AD 2024-0210R1 and the fact it should be credit taken from Mod 53-1290 and revision.

Table 1:

We are not sure how to apply Option D) for Group 2 since it is missing in the “whichever occurs first” option (in the parentheses) – which would make sense to have it as “later”. We expect the threshold to be counted from modification SB A320-53-1290 (at any revision) embodiment but in the superseded AD this option was also combined with the last performance of inspection SB A320-53-1491 (without findings only).

Request: Please confirm that the inspection threshold can be counted from modification SB A320-53-1290 (at any revision) performance without considering the performance & findings of A320-53-1491 (as it was requested by superseded AD).

Furthermore the option repaired iaw RDAF and MOD 53-1290 performed is missing.

Please update the AD accordingly.

Group 2	as applicable.	16 200 FC
	<p>Within 20 000 FC after aeroplane first flight</p> <p>Within 16 200 FC after the last inspection in accordance with the instructions of, whichever occurs first (A, B or C), as applicable:</p> <p>A) Airbus SB A320-53-1491 without findings <u>and</u> Airbus SB A320-53-1288 without findings at FR68 door stop 1 (whichever occurs first),</p> <p>B) Airbus SB A320-53-1491 without findings <u>and</u> Airworthiness Limitation Item (ALI) task 534130 accomplished before 22 November 2021 [the effective date of EASA AD 2021-0242] without findings at FR68 door stop 1 (whichever occurs first);</p> <p>C) Airbus SB A320-53-1491 without findings <u>and</u> after accomplishment of a repair of FR68 door Stop 1 in accordance – with SRM task 53-41-12-300-009 (whichever occurs first)</p> <p>D) After accomplishment/embodiment of Airbus SB A320-53-1290</p>	
	Within 12 months after 12 November 2024 [the effective date of the original issue of this AD].	

It can be that an A/C was first inspected per ALI and later with 53-1288 and later modification 53-1290 was performed, therefore has condition A, B and D. Since the 53-1288 is superseding the ALI, SWR don't understand the requirement "first". SWR has some old A/C which have been inspected in this area now over 3 times, and still we should take the first inspection to set a new interval? On the other hand, if an A/C was directly modified with 53-1290 (so only one inspection took place), it's possible to count from there. This setup makes no sense to "punish" previously inspected A/C vs not inspected.

In the original AD 2024-0210, it was clear that if a modification took place under rev 03 it's possible to count from that date (53-1491 performed without findings) – therefore it's now even more restrictive than before.

Comment B

Furthermore I do have a question related to SRM repairs. In the SB 53-1491 Rev 02 Airbus is referring to SRM 53-41-12-300-008 which basically is mentioning repair -009 (Oversize) or -010 (Freeze Plugs), depending on the extend of the finding. In the AD it is only -009 allowed. Is there a reason behind? The term "without finding" is somehow misleading.

Paragraph 2 is saying:



“any Airbus approved repair instructions have been issued, supplementing the instructions of SB A320-53-1491 at any revision for an inspection area, accomplish those instructions on that inspection area within the compliance time specified therein. Accomplishment of those inspections on that inspection area does not supersede the requirement of paragraph (1) of this AD for that inspection area.”

Does this mean only RDAF repairs? Is this meant to be read as, the repair itself should be inspected via RDAF and all other locations are then iaw with Table 2?

As an example, it could be that a door stop fitting RH side was repaired during 53-1288 inspection with a freeze plug via SRM 53-41-13-300-010 with related inspection tasks per SRI for this area, all other holes with NIL findings and mod 53-1290 performed. SWR is now understanding that this case it NOT covered in this AD and the 12-month interval must be taken into consideration for all areas RH and LH. Can you please confirm?

EASA response:

Comment noted.

Comment A: Please note that AD says “Within 16 200 FC after the LAST inspection of that inspection area [...] in accordance with [...]”.

This means, if an inspection area has been inspected several time (could be at different revisions), the last inspection counts.

This provides a “relief” compared to the previous AD, as there only the last inspection with a certain revision could be taken as “credit”.

Please also note that this is the inspection threshold for Group 2 and after that the interval as described in the AD applies.

Comment B: The “any Airbus approved repair instructions” does not only include RDAF. It has to be read as any repair instructions that were provided by Airbus. The paragraph (2) states, that those instructions provided by Airbus have to be accomplished, while the requirements of paragraph (1) still remain applicable.

Regarding the concrete example, this is confirmed .

Commenter 2: Deutsche Lufthansa AG – Martin Siring – 24/07/2025 & 01/08/2025

Comment #2

Our questions address the **Reason** section:

(...)

*Since this AD was issued, Airbus reassessed the compliance time for Group 2 inspection areas and it was determined that credit can be provided for aeroplanes having embodied **that SB at any revision**.*



*For the reasons described above, this AD is revised to update the Group 2 **compliance time in paragraph (3)** of this AD.*

Question A:

The AD refers to “the SB” with inspection SB A320-53-1491. As far as we understand, AD R01 introduced changes regarding aeroplanes having modification SB A320-53-1290 at R00,..., 02 embodied. The superseded AD only allowed to count the inspection THR from performance of A320-53-1290 R03. Otherwise, the THR of 12mth from AD effective date was requested for aircraft modified with A320-53-1290 at R00,..., 02.

Request A: Please revise “that SB” and reference the modification SB A320-53-1290 directly or introduce the modification SB in the definitions paragraph. We would appreciate it if you included the modification SB in the references as well.

Question B:

To our understanding Table 1 was positioned in paragraph 3 due to paragraphs 1, 2, 3 addressing the inspection requirements. Nevertheless, it is primarily connected to paragraph 1. Paragraph 3 received an update due to the addition of the AD R00 effective date.

Request B: Please revise “compliance time in paragraph (3)” and concise it to “compliance time in Table 1”.

Please let me add to our previous comments that we also found a potential error in **Table 1**:

We are not sure how to apply Option D) for Group 2 since it is missing in the “whichever occurs first” option (in the parentheses). We expect the threshold to be counted from modification SB A320-53-1290 (at any revision) embodiment but in the superseded AD this option was also combined with the last performance of inspection SB A320-53-1491 (without findings only).



Request C: Please confirm that the inspection threshold can be counted from modification SB A320-53-1290 (at any revision) performance without considering the performance & findings of A320-53-1491 (as it was requested by superseded AD). Please update the AD accordingly.

Group 2	as applicable. Within 20 000 FC after aeroplane first flight Within 16 200 FC after the last inspection in accordance with the instructions of, whichever occurs first (A, B or C) , as applicable: A) Airbus SB A320-53-1491 without findings <u>and</u> Airbus SB A320-53-1288 without findings at FR68 door stop 1 (whichever occurs first), B) Airbus SB A320-53-1491 without findings <u>and</u> Airworthiness Limitation Item (ALI) task 534130 accomplished before 22 November 2021 [the effective date of EASA AD 2021-0242] without findings at FR68 door stop 1 (whichever occurs first); C) Airbus SB A320-53-1491 without findings <u>and</u> after accomplishment of a repair of FR68 door Stop 1 in accordance — with SRM task 53-41-12-300-009 (whichever occurs first) D) After accomplishment/embodiment of Airbus SB A320-53-1290	16 200 FC
	Within 12 months after 12 November 2024 [the effective date of the original issue of this AD].	

While applying the individual thresholds to our aircraft, we noticed that unfortunately an additional adjustment of the Group 2 Threshold could be required, resulting in an AD revision or correction.

Please let me rephrase the time requirement of AD 2024-0210 for a comparison:

Threshold Group 2, Whichever occurs later:

(1) Within 20 000 FC after aeroplane first flight,

Or

*(2) for aeroplanes without Airbus SB A320-53-1290 embodied at any revision: Within 16 200 FC after the last inspection in accordance with, whichever occurs **first**:*

*- Airbus SB A320-53-1491 without findings, **AND***

(2.1.) - Airbus SB A320-53-1288 [without findings at FR68 Door stop 1],

Or (2.2) Airworthiness Limitation Item (ALI) task 534130 accomplished before 22 November 2021 [the effective date of EASA AD 2021-0242] without findings at FR68 Door stop 1,

Or (2.3) Airbus SB A320-53-1288 with findings and repaired in accordance with SRM task 53-41-12-300-009 at FR68 Door Stop 1,



Or

(3) for aeroplanes having SB A320-53-1290 Revision 03 or later Revision embodied: Within 16 200 FC after embodiment of SB A320-53-1290 Revision 03 or later Revision **AND** after last inspection in accordance with the Airbus SB A320-53-1491 without findings, whichever occurs first as applicable,

Or

(4) or within 12 months after the effective date of this AD.

The reason for threshold adjustment / new 2025 AD is given as: *After that AD was issued, Airbus reassessed the compliance time for Group 2 inspection areas, and it was determined that credit can be provided for aeroplanes having embodied SB A320-53-1290 at any revision.*

Our understanding would be to simply remove Revision 03 from condition above as (3) to accept the Mod SB 53-1290 performance (also R00, R01, R02) as a baseline for the inspection THR. We highly appreciate that you rephrased the rather complex threshold condition. Yet, this makes comparison to the superseded ADs complex. Let me summarize what was done:

- (1) and (4) were kept, resulting in 3) and 5) of AD 2025-0166
- (2.1) was transferred to 4)A)
- (2.2) was transferred to 4)B)
- (2.3) was transferred to 4)C) with removing reference to SB 53-1288
- (3) was extended to all accepted Revisions (removing R03 or later) but the “whichever occurs later” condition was replaced by “whichever occurs first”

Request D: Please confirm that it was EASA’s intent to make the condition for POST 53-1290 more stringent compared to superseded AD. If this is not the case, as we assume, we suggest to change D) to 5) (and 5) to 6)) and adding the “aeroplanes having SB A320-53-1290 embodied” phrase. This will result in the “whichever occurs later” condition that was intended by the superseded AD and is plausible based on the new AD’s Reason paragraph.

EASA response:

Comments noted.

A-C: Those comments were made before the issuance of EASA AD 2025-0166. It was already incorporated in the AD 2025-0166.

D: The reference in 4D) to SB 1290 was erroneously not mentioned in the superseded AD. It has been added to AD 2025-0166 accordingly.

No change has been made to the final AD in response to this comment.



Commenter 3: Jetstar Airways – Cheng Joo TAN – 14/08/2025**Comment #3**

While assessing the requirements of AD 2025-0166, Jetstar Airways note that Table 1, Group 2, Option (4) provides a threshold of 16200 FC after the last accomplishment of A320-53-1491 under 4 different conditions, whichever occurs earliest.

However, we also note that the paragraph immediately before AD Para (1) states:

“Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished”

Our question is: Since the accomplishment of the SB A320-53-1491 achieves the action required by this AD, per the above statement prior to Para (1), the last accomplishment of the SB (regardless of the 4 conditions above) would allow the aircraft to track under the intervals from then and the threshold column can be ignored.

The above interpretation, however, seems contrary to the intent listed out in Table 1, Group 2, Option (4) and would result in a longer allowable time before next inspection.

Can EASA provide some guidance on how the AD is meant to be interpreted?

EASA response:**Comment noted.**

Paragraph (1) of this AD requires accomplishment of the SB (SB 1491 at Revision 02).

If this was done previously to the AD (SB at Revision 02 or later Revision) and logged as such, this can be considered as initial inspection. After that indeed the Intervals can be accomplished directly.

If the SB has been accomplished at a previous Revision (initial issue or Revision 01), the initial inspection threshold would be applicable and has to be followed to accomplish the SB at the Revision 02 or later.

No change has been made to the final AD in response to this comment.

Commenter 4: Aero K Airlines Co., Ltd. – Soojong Kim – 04/08/2025**Comment #4**

While reviewing **EASA AD 2025-0166** to ensure compliance, we identified a point in **Table 1, Group 2, Item 4) A)** that requires clarification.

The provision states:

"Airbus SB A320-53-1491 without findings and Airbus SB A320-53-1288 without findings at FR68 door stop 1 (whichever occurs first)."

EASA AD No.: 2025-0166

Table 1 – Initial SDI and Interval

Group	Inspection Thresholds	Intervals
Group 1	<p><u>1) or 2), whichever occurs later</u></p> <p>1) Within 20 000 flight cycles (FC) after aeroplane first flight</p> <p>Or</p> <p>2) Within 19 700 FC after the last inspection of that inspection area accomplished before 12 November 2024 [the effective date of EASA AD 2024-0210 at original issue] in accordance with the instructions of the original issue or Revision 01 of Airbus SB A320-53-1491, as applicable.</p>	19 700 FC
Group 2	<p><u>3), 4) or 5), whichever occurs later</u></p> <p>3) Within 20 000 FC after aeroplane first flight</p> <p>Or</p> <p>4) Within 16 200 FC after the last inspection of that inspection area accomplished before 12 November 2024 [the effective date of EASA AD 2024-0210 at original issue] in accordance with the instructions of A), B), C) or D), whichever occurs first, as applicable:</p> <p>A) Airbus SB A320-53-1491 without findings <u>and</u> Airbus SB A320-53-1288 without findings at FR68 door stop 1 (whichever occurs first);</p> <p>B) Airbus SB A320-53-1491 without findings <u>and</u> Airworthiness Limitation Item (ALI) task 534130 accomplished before 22 November 2021 [the effective date of EASA AD 2021-0242] without findings at FR68 door stop 1 (whichever occurs first);</p> <p>C) Airbus SB A320-53-1491 without findings <u>and</u> after accomplishment of a repair of FR68 door Stop 1 in accordance with SRM task 53-41-12-300-009 (whichever occurs first);</p> <p>D) Airbus SB A320-53-1491 without findings <u>and</u> after accomplishment/embodiment of Airbus SB A320-53-1290 (whichever occurs first)</p> <p>Or</p> <p>5) Within 12 months after 12 November 2024 [the effective date of EASA AD 2024-0210 at original issue].</p>	16 200 FC



However, the AD does not specify whether the referenced Airbus SB versions are **Original, Revision 01, Revision 02**, or if all revisions are applicable. Due to this ambiguity, we are facing difficulties in determining the correct compliance schedule for this AD, as the applicable SB version directly affects the timing of required inspections and actions.

Therefore, we kindly request clarification on the following:

Q: In EASA AD 2025-0166 Table 1, Group 2, Item 4) A), do the referenced SBs correspond to Original, Revision 01, Revision 02, or are all revisions included?

EASA response:

Comment noted.

As the AD does not specify any Revisions, all revisions are included.

No change has been made to the final AD in response to this comment.

Commenter 5: LATAM – Gabriela Quijada – 05/08/2025

Comment #5

A. SRM task 53-41-12-300-010 is missing referenced in this AD. In accordance with account.airworth-eas@airbus.com, aircraft repaired under SRM 53-41-12-300-010 are considered Group 2.

This condition should be mentioned in the AD as was done in note 1 for SRM task 53-41-12-300-009.

B. The repairs defined in SRM task 53-41-12-300-009 and SRM task 53-41-12-300-010 are technically similar, with the only difference being the installation of freeze plugs where required. Based on this, we consider that another condition in the Table 1, point 4 should be added as shown below:

“Airbus SB A320-53-1491 without findings and after accomplishment of a repair of FR68 door Stop 1 in accordance with SRM task 53-41-12-300-010 (whichever occurs first);”

C. Additionally, we would like to point out that the phrase “any other repair part approved by Airbus is embodied” within the Group 1 definition introduces considerable ambiguity and may lead to confusion when determining group classification.

EASA response:

Comment noted.



A and B: Note 1 was just added in the AD for information. It does not provide an extensive list of SRM tasks. Indeed, as Airbus answered you, that aeroplane is considered a Group 2 aeroplane.

C: Please note the difference between repair part and repair. Group 1 aeroplanes are only those with a repair part.

No change has been made to the final AD in response to this comment.

Commenter 6: Allegiant Travel Company – Brandon Groh – 20/08/2025

Comment #6

I have a question about EASA AD 2022-0030 and paragraph (4) of that AD. It states that accomplishment of a corrective action as required by paragraph (3) of the AD does not constitute terminating action for the repetitive SDI as required by paragraph (1), unless specified otherwise in the instructions provided by Airbus.

We have recently had an aircraft that required a repair to the affected area and in the RDAF from Airbus, in the limitations section, it states “Mandatory SB 53-1288 and SB-53-1491 are impacted by the repair. An alternative inspection programme is presented for the area that cannot be inspected due to the repair. Mandatory SB 53-1288 and SB-53-1491 remain valid for all the remaining locations specified within them”. I wanted to check and confirm that is statement satisfies the “unless specified otherwise in the instructions provided by Airbus” requirement since it does not specifically reference AD 2022-0030 but does reference back to SB 53-1491 which is the inspection SB.

EASA response:

Comment noted.

This condition does indeed qualifies under “unless specified otherwise in the instructions provided by Airbus”.

Meaning you have to follow from now on for that inspection area the alternative inspection program and not the one in the SBs.

Please note that AD 2022-0030 was superseded already twice. The latest AD on this topic is AD 2025-0166. This is the reason why this comment is also included in the CRD to AD 2025-0166.

No change has been made to the final AD in response to this comment.

Commenter 7: Spring Airlines Co.,Ltd. – Li Yang – 06/08/2025, 19/08/2025 & 20/08/2025



Comment #7

Please review the following information and clarify whether our understanding "**We believe that it is more reasonable for D) to be in a separate paragraph and compared with 3), 4), and 5) for a later value.**" is correct.

If yes, please revise AD 2025-0166 Table 1.

If no, please make an explanation and how to understand 4) D) in AD.

The situation described below is not an exception but a common case. ALL operators must perform ISB 52-1288 prior to MSB 52-1290. **So it makes no sense to put "D)" into Table 1 4) of AD 2025-0166 together with A),B),C) to take an earlier value.** This will only cause ambiguity. AD as a rigorous document should not have such low-level logical errors. Please kindly review and revise AD accordingly.

So, it is allowed to perform SB 53-1290 first without implementing SB 53-1288, and this does not constitute a deviation from AD 2021-0242, right?

If it is right, how to explain the compliance of SB 53-1288 and AD 2021-0242 PARA.(9)&(10) (my point 1 & 2) ?

If it is not right, we do know 53-1290 is an optional terminating action, if choose to do, the earliest implementing time of 53-1290 is also the same as 53-1288, but it will not earlier than 53-1288, then 4) D) will be a redundant condition and operators only need to refer to 4) A) to C). If choose not to do, operator still need to refer to 4) A) to C). Could you give an example of a situation where 4) D) is earlier than A), B) or C)?

EASA response:**Comment noted.**

Please note that AD 2021-0242 actually does not require to accomplish SB 1288 and 1290 (together). This is an optional terminating action.

Having said the above, point (4)D is to the current standpoint correctly positioned in the AD, as this is seen as optional.

As stated above, the inclusion of option D) is based on a technically valid and AD-compliant sequence, albeit not the standard route to terminating action. The AD does not prohibit operators from embodying SB 53-1290 prior to performing SB 53-1288; simply such a path does not constitute terminating action unless specific conditions are met — namely, that the modification follows a compliant inspection with no findings.

The rationale for including option D) is precisely to acknowledge this less typical, but permissible scenario, and to ensure traceability in cases where this sequence occurs. Its presence in the table is not indicative of an equivalence with the other options in terms of outcome, but rather a reflection of actual operational practices which, while uncommon, can occur.

No change has been made to the final AD in response to this comment.



Commenter 8: Cyprus Airways – Alexis Papadopoulos – 27/08/2025**Comment #8**

Paragraph (1) refers to Table 1.

As per Table 1, there are 3 options 3), 4) or 5) whichever occurs later

As per option 4), perform the inspection at 16200FC after last Inspection accomplished before Nov-2024..... in accordance with A), B), C) or D).....

So our question is, an aircraft on Group 2, with more than 20000FC at AD effective date, on which both SB's have been perform **after** Nov-2024, does this mean that this aircraft falls under option 5) and inspection should be perform within 12MO after Nov-2024 ?

We believe that wording on Table 1 option 4), erroneously omits aircrafts at which inspection SB's were perform after Nov-2024 with latest Revision of the Inspection SB's.

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

Based on the question, EASA understands that the inspection was performed with the inspection SB at revision 02 after November 2024.

In case this is correct, please refer to the answer to comment 3.

No change has been made to the final AD in response to this comment.

