

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0167

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

### Commenter 1: Air France – Gilles Oriot – 30/07/2025

#### Comment #1

The EASA AD 2025-0167 requests the replacement of affected parts as defined in the AOT A32N036-25.

But, as this AD enlarges the aeroplane applicability to all the MSNs of A320 family, it is necessary to perform an identification of the parts of these P/N on all the fleet.

To perform this task, it is not indicated in this AD that check of maintenance records are accepted which let understand that identification on airplane is necessary. Previously, the A32N036-25 in reference was only focused on precise aircraft MSN listed in Appendix 1 which is not the case anymore.

Could you please clarify if checking of maintenance records is an acceptable mean to fulfill the identification of the affected parts?

#### **EASA response:**

#### **Comment noted.**

**As the AD does not specify a way to determine if affected parts are installed or not, this can be done in various ways, to the satisfaction of the responsible NAA.**

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

### Commenter 2: China Southern Airlines LTD – Niu Xingyu – 01/08/2025

#### Comment #2

CSN identified two issues in AOT A32N036-25 Rev 00 and EASA AD 2025-0167 Rev 00:

A. Applicability issue



We have found that the affected aircraft in Appendix 1 of AOT A32N036-25 Rev 00 are not only newly delivered ones, but also those with a relatively long service life. These aircraft have had their main landing gears replaced, so it is currently impossible to determine that the affected components are still installed on these aircraft. Airlines need to conduct a fleet census to confirm the distribution of affected components.

CSN hopes that EASA will confirm whether aircraft that have not had their main landing gear replaced after delivery and are not affected by Appendix 1 of AOT A32N036-25 Rev 00 can be regarded as not applicable to EASA AD 2025-0167 Rev 00?

#### B. Completion time limit issue

The completion deadlines required for EASA AD 2025-0167 Rev 00 are as follows:

##### “Replacement:

(1) For Group 1 aeroplanes: Within 12 months since the date of first installation of an affected part on any aeroplane, or within one month after the effective date of this AD, whichever occurs later, replace that affected part with a serviceable part in accordance with the instructions of the AOT.”

For aircraft whose main landing gear has not been replaced after delivery, airlines cannot confirm the date of installation of affected part on aircraft. Take MSN 12343 as an example: MSN 12343 was delivered on January 4, 2025, and CSN was unable to confirm the date of installation of affected part on aircraft. MSN 12343 has been delivered for nearly 8 months. The time left for CSN to implement the requirements of EASA AD 2025-0167 is really too little. CSN may have to immediately park the aircraft at AOG.

Please EASA modify this description to be 12 months from the date of delivery of the affected aircraft. If this part is not modified, airlines will encounter difficulties in implementing AD, the aircraft will be grounded, and airlines will suffer huge losses.

#### **EASA response:**

***A: Comment noted. If the part has never been changed after the date of manufacturing and from the AIR (Aircraft Inspection Report) it is confirmed, that no affected part is installed, the aeroplane is considered a Group 2 aeroplane. In case the part has been replaced after the date of manufacturing and it is confirmed that this part is not an affected part, as defined in the AD, the aeroplane can also be considered as Group 2 aeroplane. Please see also the answer to Comment 1, for more information on how to determine whether an affected part is installed or not.***

***B: Comment agreed. The revised AD will also state that the replacement can be done within 12 months after the delivery of an aeroplane. In response to this comment the AD is revised.***

