

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0178

[Published on 08 August 2025 and officially closed for comments on 05 September 2025]

Commenter 1: Korean Air – Hyunwoo So – 11/08/2025

Comment #1

We operate the A330 Fleet. (Refer to the MSN Number, total is 22)

256	267	338	350	351	368
425	428	484	490	550	
1133	1155	1200	1203	1393	1556
1576	1590	1611	1638	1647	

According to the Applicability section, I understand that the A330 is exempted from the following four conditions.

-----Quote from AD-----

Applicability: A330-223, A330-223F, A330-243, A330-243F, A330-321, A330-322, A330-323, A330-341, A330-342 and A330-343 aeroplanes, all manufacturer serial numbers (MSN), except those in any of the following configurations:

- Airbus modification (mod) 200384 embodied and mod 202371 not embodied.

> MSN 1393, 1556, 1576, 1590, 1611, 1638, 1647 (7 aircrafts)

- Airbus Service Bulletin (SB) A330-22-3193 embodied.

> N/A

- Airbus SB A330-22-3194 embodied.

> N/A

- Airbus SB A330-22-3297 embodied.

> N/A

-----Unquote from AD-----

* Conclusion : Of the 22 aircraft we operate, 7 are excluded under the first condition, leaving 15 aircraft eligible for applicability.



256	267	338	350	351	368
425	428	484	490	550	
1133	1155	1200	1203	1393	1556
1576	1590	1611	1638	1647	

Also, The FMGEC Standards for our 22 aircraft are as follows.

In this case, I believe they are unrelated to EASA AD 2025-0178 and I wonder if they can be considered Not Applicable.

FMGEC Standard	FMGEC Part Number	Vendor	MSN
T2CD9	C13039CA02	Thales FMS	256, 267, 338, 350, 351, 368, 425, 428, 484, 490, 550
T5BH3	C13164HA07	Thales FMS	1133, 1155, 1200, 1203, 1393, 1556, 1576, 1590, 1611, 1638, 1647

The relevant SB only covers Honeywell FMGEC, But Our FMGEC Std' Vendor is Thales.

Finally, we are seeking clarification on the applicability of EASA AD 2025-0178 for our fleet of 22 A330 aircraft.

Based on the criteria in the 'Applicability' section, we have identified that 7 of these aircraft are exempt.

We also believe that the remaining 15 aircraft are not affected by this directive.

Consequently, it is our understanding that the AD is not applicable to our entire fleet.

Could you please confirm if our understanding is correct?

EASA response:

Comment not agreed.

To get a robust reply, the commenter should have identified the aeroplane model(s) associated to the MSNs mentioned. However, EASA confirm those 7 aeroplanes on which modification (mod) 200384 is embodied and mod 202371 is not embodied are not affected by the AD.

The other 15 aeroplanes (which are assumed to be among the A330 models identified in the applicability of the AD) remain affected by the AD, but those ones are Group 2 aeroplanes, for which the AD 2025-0178 paragraph (2) and (3) shall be considered even though no immediate action is required by the AD against that population.

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



Commenter 2: Deutsche Lufthansa AG – Gerald Glasse – 11/08/2025**Comment #2**

According to AD 2025-0178 the Honeywell FMGEC standard P6H7 is affected by thrust fluctuation during descent if the ATHR N1 mode is not activated. If I follow the applicability of the AD, all aircraft are affected, also those who have installed a Thales FMGEC, independent of the standard. Under section Definitions, the listed “FMGEC SBs” which classifies the aircraft into group 1 or group2 are not applicable for Thales FMGECs such for example for T2 standard.

For administrative reasons, it would be better to make the applicability clearer like in the responding AOT.

Perhaps, with the next revision, is it possible to make the applicability clearer?

EASA response:**Comment not agreed.**

The issue addressed by this AD is not dependent on the FMGEC Vendor, but rather from the FMGEC standard (post H3). Moreover, some optional modifications allow some production configurations to be changed, making the applicability and dispositions of the AD 2025-0178 fully accurate.

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

Commenter 3: Hainan Airlines – Wang Qiang – 13/08/2025 and 14/08/2025**Comment #3**

I have an inquiry on EASA AD_ 025-0178 to our company two aircraft.

MODs 200384; 202371 or SB 22-3193; SB 22-3194; SB 22-3297 were not embodied on MSN 908; MSN 1028. And SB 22-3193; SB 22-3194; SB 22-3297 were not applicable for MSN 908; MSN 1028.

The objective of AOT A22L003-25 (from EASA 2025-0178) is "The AOT requires the operator to activate the ATHR N1 function when the FGE H7 standard has already been installed, or during installation using either SB 22-3338, 22-3356, 22-3407, 22-3426 or 22-3417."

The FMGEC SB:SB 22-3338, 22-3356, 22-3407, 22-3426 or 22-3417 were not embodied on MSN 908; MSN 1028.

Based on the above information, can it be determined that MSN 908 and MSN 1028 are not applicable to this EASA AD 2025-0178?



The following are the relevant contents of EASA AD 2025-0178 :

Applicability:

A330-223, A330-223F, A330-243, A330-243F, A330-321, A330-322, A330-323, A330-341, A330-342 and A330-343 aeroplanes, all manufacturer serial numbers (MSN), except those in any of the following configurations:

- Airbus modification (mod) 200384 embodied and mod 202371 not embodied.
- Airbus Service Bulletin (SB) A330-22-3193 embodied.
- Airbus SB A330-22-3194 embodied.
- Airbus SB A330-22-3297 embodied.

The FMGEC SB: Airbus Service Bulletin (SB) A330-22-3338, SB A330-22-3356, SB A330-22-3407, SBA330-22-3426 or SB A330-22-3417, as applicable, installing Flight Management Guidance and Envelope Computer (FMGEC) at different standards.

Groups: Group 1 aeroplanes are those on which the FMGEC SB has been embodied. Group 2 aeroplanes are those which are not Group 1.

Modification: (2) For Group 2 aeroplanes: From the effective date of this AD, it is allowed to modify the aeroplane in accordance with the instructions of the FMGEC SB provided that, concurrently, the ATHR N1 function is activated on that aeroplane.

According to the reply of Airbus TR8164001, MSN 908 and MSN 1028 are not applicable now to EASA AD 2025-0178. Please see the attachment.

We hope the EASA can confirm that MSN 908 and MSN 1028 are not applicable to EASA AD 2025-0178.

EASA response:

Comment not agreed.

The aeroplane models associated to MSNs 908 and 1028 are assumed to be among the A330 models identified in the applicability of the AD, and therefore they remain affected by the AD, as none of the exemption criteria is applicable to any of them.

As those MSNs have not embodied the FMGEC SB, as defined in the AD 2025-0178, they are part of the Group 2 aeroplanes, for which the AD 2025-paragraph (2) and (3) shall be considered even though no immediate action is required by the AD against them.

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

Note: EASA recommends the commenter to share this EASA position with the author of the Airbus reply TR8164001, who should update the contents of its reply and any other ones which would have been released with the similar (erroneous) contents.



Commenter 4: Hi Fly – Rui Cavaco – 20/08/2025**Comment #4**

The following exposition is pertinent to our A330 MSN 0874, hereafter referred to as HFK, for which we hereby request your educated feedback: HFK would fall in AD 2025-0178's Group 1 since it has AIRBUS SB A330-22-3356 embodied since late 2024.

AIRBUS SB A330-22-3194 is already embodied in HFK as well, but not yet included in its applicability; embodiment took place before release of both AOT A22L003-25 and subject AD, and under the framework of AIRBUS Repair and Design Approval Form (RDAF) 81585719/038/2025 Issue A.

It could be controversial to consider an AIRBUS SB embodied in an aircraft to which it doesn't explicitly apply to. Hence, one might be convinced that subject AD is indeed effective to HFK, since the later couldn't fulfil any exception listed in the AD applicability.

In such contentious scenario, current wording of subject AD Note 1 restricts using AD §(3) to demonstrate compliance with AD §(1) for aircraft to which AMOC SB (not only but also, SB A330-22-3194) explicitly apply – on which HFK doesn't find room.

However, the required action under AD §(1) is impossible/redundant on HFK due to its pre-existing condition.

As a result, and while AMOC SB are not officially revised to accommodate missing aircraft in their applicability, we fear there is a loophole between AD §(1) and AD §(3), but this could be relieved by including a supplemental credit clause for RDAF umbrella, if you agree.

EASA response:**Comment noted.**

In Appendix E of the AOT, the RDAF 81585719/038/2025 is identified as the instruction to accomplish the modification on MSN 874 (i.e. HFK). If that RDAF has been accomplished, therefore, MSN 874 is already in compliance with the AD.

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

