

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0183

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**Commenter 1: Lufthansa Technik AG – Ari Jurva-Sihto – 29/08/2025**

### Comment #1

I am writing to submit a formal comment regarding EASA Airworthiness Directive 2025-0183, which mandates the removal from service of Hydro-Mechanical Units (HMUs) with part numbers G5000HMU02 and G5000HMU03 that have exceeded Time Since New (TSN) or Time Since Overhaul (TSO) threshold mentioned in the document.

We would like to highlight that these HMUs were not previously subject to time-controlled tracking, and as a result, a number of units currently in service or inventory have unknown TSN/TSO due to incomplete historical documentation.

We have reviewed Airbus ISI 00.05.00005 Revision 7, which provides EASA-concurred methodologies (Yearly Fleet Leader and Monte Carlo Counting Methods) for assigning life to components with partial or unknown history. We believe this ISI offers a structured and compliant approach to estimate TSN/TSO for affected HMUs.

We respectfully request EASA to:

- A. Confirm whether ISI 00.05.00005 is acceptable for use in demonstrating compliance with AD 2025-0183 for components with unknown TSN/TSO.
- B. Provide guidance or criteria for operators to apply these methodologies in practice.
- C. Consider issuing a general AMOC or advisory note referencing ISI 00.05.00005 as an acceptable method for life estimation in this context.

### EASA response:

**Comment noted. Provisions on ISI 00.05.00005 can be followed only, if specifically mentioned and allowed by each individual Airbus Service Bulletin. In addition, Airbus has confirmed that as a general rule ISI 00.05.00005 is not applicable for use with engine/engine components, as the ISI is based on aircraft utilization values (flight hours/flight cycles) and not engine utilization values (engine hours/engine cycles), which might be different. It is expected that Airbus will update the ISI accordingly by the end of 2025, to explicit this restriction.**

**Airbus and Rolls-Royce shall be consulted for any guidance on how to assess the accumulated in service life of components without proper record history.**



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

