

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0192

[Published on 08 September 2025 and officially closed for comments on 06 October 2025]

Commenter 1: Singapore Airlines Limited – Andrew Kok – 09/09/2025

Comment #1

Per 3rd bullet point in below snapshot, Grp 1 aeroplane are those that have embodied SB A350-52-P057 on 22 Sep'25 (effective date of subject AD) or earlier.

Groups: Group 1 aeroplanes are those:

- On which Airbus modification (mod) 115327 has been embodied in production, and having an aeroplane reference date, as defined in this AD, equal to or earlier than the effective date of this AD or
- Having MSN 0494, 0507, 0551, 0552 or MSN 0559 or
- On which Service Bulletin (SB) A350-52-P057 original issue has been embodied in service, at a date equal to or earlier than the effective date of this AD.

Group 2 aeroplanes are those which are not Group 1 aeroplanes.

Could EASA please confirm whether an aircraft that embodies SB A350-52-P057 after 22 Sep'25 is considered a Group 2 aeroplane?

EASA response:

Comment noted. According to the Groups definition as stated in the EASA AD 2025-0192, an aircraft that embodied SB A350-52-P057 after 22 September 2025 is considered a Group 2 aeroplane.

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

Commenter 2: Lufthansa Technik AG – Carsten Marks – 12/09/2025



Comment #2

AD 2025-0192 mandates the inspection of Passenger / Crew Door Girt Bar Fitting Assemblies on a group of A350 aeroplanes defined as „Group 1“ per AD. Inspection has to be performed in accordance with Airbus AOT A52P017-25.

Among others, the AD definition of Group 1 states: „[aeroplanes]...on which Service Bulletin (SB) A350-52-P057 original issue has been embodied in service, at a date equal to or earlier than the effective date of this AD“, i.e. 22-September-2025.

The referenced AOT contains a similar condition, although referring to AOT Rev. 0 Date of Effectivity (i.e. 30-June-2025).

For LHT's customer German Air Force A350 fleet, the AOT by itself is not applicable per mod status and per the above referenced condition, as the SB A350-52-P057 original issue has not been performed at a time when the MP tasks in question were still active. Considering the technical background of the AD, this seems a correct evaluation of the situation.

However, as the AD refers to the AD Effective Date instead of the AOT effectivity date, these aircraft now formally become Group 1 aircraft and thus an inspection is required per an AOT which is (still) not applicable.

LHT kindly requests a review of the Group 1 definition and recommends to use the AOT effective date instead of the AD effective date for the condition „[Aeroplanes]...On which Service Bulletin (SB) A350-52-P057 original issue has been embodied in service, at a date equal to or earlier than the effective date of this AD“.

EASA response:

Comment disagreed. An aeroplane on which Airbus SB A350-52-P057 original issue has been embodied in service at a date equal to or earlier than 22 September 2025, is Group 1 aeroplane, as defined in EASA AD 2025-0192. Consequently, the requirements of paragraph (1) of that AD apply to this aeroplane. To be noted that only after 22 September 2025 (effective date of AD 2025-0192) the prohibition to use the MP task entered in to force; the AOT has been revised accordingly.

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

Commenter 3: Delta Air Lines – Michael D. Tharp – 25/09/2025**Comment #3**

1. DAL would like to clarify the intent of the wording in para 5.4, Step (3) of the AOT (Ref B), as step (3) contains both positive and negative language that could lead to confusion.



- The second half of the step contradicts itself when it provides instructions to make sure that the safety hook is not stuck in the upward position but also make sure the safety hook does not immediately come back down when released.

“Perform Detailed Inspection (DET) on both FWD and AFT girt bar fittings to ensure excessive sealant is not obstructing the safety hook end stop (Figure 4) **(make sure that the safety hook is not stuck in the upward position or that the safety hooks does not immediately come back to the downward position when released)**”

DAL believes that the text below is an accurate reflection of Airbus’s intention in AOT para 5.4.(3) and is clearer. Additionally, Airbus confirmed in TR 81657113, (Ref C) that they have no objection with DAL substituting text as indicated below:

- (3) Perform Detailed Inspection (DET) on both FWD and AFT girt bar fittings to ensure excessive sealant is not obstructing the safety hook end stop (Figure 4).

A. Make sure that the safety hooks are not stuck in the upward position.

B. Using slight finger pressure lift each safety hook (FWD and AFT) from the downward position to the upward position to check for excess sealant or contact with sealant.

C. Release the safety hook and ensure that the safety hooks immediately snap back to the downward position when released.

NOTE: Moving the hook upward should require low force with one finger, the hook should quickly come back downward when released.

2. Delta requests EASA clarify the requirements of paragraph (1), one-time inspection.

- Paragraph (1), one time inspection of EASA AD (ref A) requires operators to accomplish a DET of each affected part in accordance with the instructions of the AOT.

DAL is requesting EASA clarify if the requirement is to accomplish only the DET inspection defined in Step (3) of the AOT (Ref B), or if it is also required to accomplish step (1) (which is defined as a GVI) and steps (2), (4) and (5) (which do not define either a GVI or a DET).

- Delta suggests the following text be modified from (original text):

(1) For Group 1 aeroplanes: Within 4 months after the effective date of this AD, accomplish a **DET of each affected part in accordance with the instructions of the AOT.**

To state (modified text):

(1) For Group 1 aeroplanes: Within 4 months after the effective date of this AD, accomplish **the inspection instructions on each affected part in accordance the AOT.**

3. Delta requests EASA clarify the intent of extending the Group 1 effectivity through EASA ADED.



- The effectivity of the AOT is slightly different than the effectivity of the EASA AD, in that the AOT uses the AOT effective date, and the EASA AD uses the EASA AD effective date. Delta believes that the AOT effective date uses an estimated publication date of the reviewed MP tasks, whereas the EASA AD effective date uses a date known to capture all suspect A/C up until the listed MP tasks were known to be revised and published.

DAL would like EASA to confirm that the intent of extending the effectivity of group 1, post mod 115327 aircraft through EASA ADED was to ensure that any aircraft that could have been delivered before the AMM updates were implemented by AIRBUS are inspected. As of EASA ADED, no aircraft are subject to the group 1 inspection requirement as Airbus has rectified the possibility of excessive sealant application. Extending the date of the effectivity past this date would result in aircraft being inspected that are not at risk of having excessive sealant.

EASA response:

1. ***Comment noted. Airbus shall be consulted for any guidance on how to assess the technical content of the AOT. No change has been made to the Final AD in response to this comment.***
2. ***Comment agreed. The Final AD has been superseded and the new AD has been issued, amended accordingly.***
3. ***Please see answer to Comment #1 and Comment #2. It is also to be stressed that the EASA AD can refer only to the AD effective date, because only from AD effective date the AD requirement (3) not to use the MP tasks, as defined in the AD, enters into force.***

Commenter 4: China Airlines – Chi-hung, Wu – 07/10/2025

Comment #3

Our fleet consists of 15 A350 aircraft, currently classified as follows:

- Group 1: 4 aircraft that meet the embodiment condition of SB A350-52-P057 (MSN 0049, 0057, 0066, 0358)
- Group 2: 11 aircraft not listed in Group 1.

For Group 1, all four aircraft have embodied SB A350-52-P057 and subsequently accomplished the one-time Detailed Inspection in accordance with Airbus AOT A52P017-25. Some of these inspections were performed before the effective date of EASA AD 2025-0192 (22-SEP-2025).

As this AD does not contain a “Credit” provision, we would like to request EASA’s clarification on whether the inspections already accomplished before the AD effective date can be accepted as compliance with AD 2025-0192. In addition, please advise if EASA intends to revise this AD to include a Credit paragraph for such cases.

EASA response:



Comment noted. The inspections mandated by the paragraph (1) of EASA AD 2025-0192 must be accomplished after the effective date of this AD as only from AD effective date the AD requirement (3) not to use the MP tasks, as defined in the A, enters into force. The Final AD has been superseded and a new AD has been issued to specify that the required inspection must be accomplished within 4 months after 22 September 2025 [the effective date of the EASA AD 2025-0192], but not before 22 September 2025. In addition, a Credit paragraph has been added for actions accomplished, if no MP tasks were used.

