

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0197

[Published on 12 September 2025 and officially closed for comments on 10 October 2025]

### Commenter 1: China Airlines – Chia-Chieh Chang – 16/09/2025

#### Comment #1

There are two questions after CAL reviewed the AD EASA 2025-0197.

1. This AD requires the MSB A350-27-P078, as permanently eliminates the potential unsafe condition for FCRM contaminated. MSB A350-27-P078 is rebound the FCGS SW X14 to PRIM P14.1.3 and SEC S14.1.2.

A/C would still do not have the function for FCRM contaminated if only FCGS SW X14 installed.

2. In paragraph of Software Installation: (14) Do not install on any aeroplane any FCGS SW version earlier than X14 STD, as required by paragraph (14.1) or (14.2) of this AD.

(14.1) For Group 1 aeroplanes: After modification of the aeroplane as required by paragraph (9) or as specified by paragraph (13) of this AD.

(14.2) For Group 2 aeroplanes: From the effective date of this AD.

But in paragraph of Definitions in this AD:

Group 1 aeroplanes are those that have an affected FCRM – type 1 installed.

Group 2 aeroplanes are those that are not Group 1.

Should there be have other Group for FCGS SW?

#### EASA response:

**1. Comment noted. The introduction of Flight Control and Guidance System (FCGS) PRIM P14.1.3 and SEC S14.1.2 Software (SW) standards (FCGS SW X14 Rebound), which can be accomplished through the application of the Airbus MSB A350-27-P078, constitutes the final fix for the unsafe condition addressed by EASA AD 2025-0197.**

**2. Comment partially agreed. The Groups definitions in EASA AD 2025-0197 are correct and cover all aeroplanes, to which the AD applies. However, the prohibition to install of any FCGS PRIM and SEC SW versions earlier than PRIM P14.1.3 and SEC S14.1.2 SW standards applies to Group 1 and Group 2 aeroplanes after their modification, as required by that AD.**

**The AD is revised to clarify the requirement to install the PRIM P14.1.3 and SEC S14.1.2 SW standards, and to amend the paragraph (14) accordingly.**

**Commenter 2: Eastern Airlines Technic Co.,Ltd – Luo Weihua – 18/09/2025**

### Comment #2

In SB 42-P020 is called X14 STD and in SB 27-P078 is called X14 STD too. The difference between the SB is the software version of PRIMs and SECs.

So what is the definition of the FCGS X14 STD in section 14 of EASA AD2025-197?

And why does section 14 describe group 1 and group 2?

Whether A/C in group 2 had completed SB42-P020 means aircraft conform to the software prohibition requirement of EASA AD2025-197 section 14?

#### Software Installation:

(14) Do not install on any aeroplane any FCGS SW version earlier than X14 STD, as required by paragraph (14.1) or (14.2) of this AD.



An agency of the European Union

TE.CAP.00110-012 © European Union Aviation Safety Agency. All rights reserved. ISO9001 Certified.  
Proprietary document. Copies are not controlled. Confirm revision status through the EASA-Internet/Intranet.

Page 4 of 5

EASA AD No.: 2025-0197

(14.1) For Group 1 aeroplanes: After modification of the aeroplane as required by paragraph (9) or as specified by paragraph (13) of this AD.

(14.2) For Group 2 aeroplanes: From the effective date of this AD.



An agency of the European Union

TE.CAP.00115-007 © European Union Aviation Safety Agency. All rights reserved. ISO9001 Certified.  
Proprietary document. Copies are not controlled. Confirm revision status through the EASA-Internet/Intranet.

**EASA response:**

**Please see answer to Comment #1.**

**Commenter 3: Turkish Airlines – Ahmet BULUT – 18/09/2025**
**Comment #3**

We are currently reviewing the requirements of EASA AD 2025-0197, which specifies the installation of **FCGS SW X14 Standard (or later)** as the terminating action to address the unsafe condition related to FCRM contamination.

However, according to Airbus TFU 27.00.00129, the definitive terminating action is associated with the implementation of **FCGS SW X14 Rebound**. Please see the following highlighted section from TFU 27.00.00129.

**Terminating action:**

As a terminating action, to avoid reproducing such experience in-service event, a new software of Flight Control Computer (PRIM/SEC) has been dispatched the 29<sup>th</sup> of July. **This new SW necessitates as prerequisite the Avionic Batch 7B - part 2 SB 42-P020**

As shared during the Webinar, the logic of monitoring and commanding actuators/FCRM in case of failures has been modified in this new standard.

- On previous standard **(incl FCGS X14)** : the 60V power supply from PRIM/SEC was only cut in case of failure affecting a communication issue between Flight Control Computers and FCRM (known as No Refresh)
- From FCGS X14 **rebound**, the 60 power supply cut has been generalized whatever the failure, avoiding any uncommanded order between the FCRM and the various internal component of the actuator body.

**This new SB will be mandated by a new AD that will supersede AD 2025-0129. This new AD is expected in the coming weeks. A grace period of 3MO from SB issuance is expected and should be reflected in the AD.**

As we understand, **FCGS SW X14 Rebound** introduces additional monitoring logic and power supply cut-off improvements. EASA AD 2025-0197 states in parag (14) not to install on any aeroplane any FCGS SW version earlier than X14 STD. Therefore, installation of FCGS SW X14 is allowed. However, this version does not eliminate the unsafe condition.



**Software Installation:**

(14) Do not install on any aeroplane any FCGS SW version earlier than **X14 STD**, as required by paragraph (14.1) or (14.2) of this AD.

Airbus Modification Service Bulletin (SB) A350-27-P078 makes the following software changes, from OLD PART No (FCGS SW X14) to NEW PART No (FCGS SW X14 Rebound) to ensure the system fault tolerance to this electronic failure by cutting 60V supply in flight for all detected failures. Therefore, we understand that FCGS SW X14 (without Rebound) should not be allowed to install. As we check, Airbus Illustrated Part Data (IPD), OLD Part numbers of FCGS SW X14 can be installed.

**E. LIST OF EXISTING PARTS****Interchangeable parts for task set A350-A-27-XX-P078-01000-93AA-A Modification**

| DESCRIPTION             | OLD PART No.    | NEW PART No.    | INT | SEE NOTES |
|-------------------------|-----------------|-----------------|-----|-----------|
| SOFTWARE-SEC CHANNEL B  | ABF48A6S0BL22RE | ABF49A6S0BL22SE | 03  | (1) (2)   |
| SOFTWARE-SEC CHANNEL A  | ABF4BA6S0BL21RE | ABF4AA6S0BL21SE | 03  | (1) (2)   |
| SOFTWARE-PRIM CHANNEL A | ABF58A6P0AL2151 | ABF5BA6P0AL2161 | 03  | (1) (2)   |
| SOFTWARE-PRIM CHANNEL B | ABF5BA6P0AL2251 | ABF58A6P0AL2261 | 03  | (1) (2)   |

To avoid misinterpretation and ensure proper compliance for our fleet, could you please clarify the following points:

1. Does the installation of FCGS SW X14 Standard (without Rebound) fully address the unsafe condition, as states in EASA AD 2025-0197?
2. Should operators anticipate a new upcoming AD for Rebound version?
3. If so, will Airbus IPD be updated accordingly?

We would greatly appreciate your confirmation and guidance, as this will directly impact our compliance strategy and planning.

***EASA response:***

***Please see answer to Comment #1.***



**Commenter 4: Singapore Airlines Limited – Andrew Kok – 19/09/2025****Comment #4**

Refer to below snapshot, EASA's (highlighted blue) AD quoted the installation of **FCGS SW X14 Standard** as the required compliance, while Airbus's SB A350-27-P078 (highlighted yellow) quoted the installation of **FCGS SW X14 Standard Rebound**.

|  |  |   |
|--|--|---|
| <b>Modification:</b><br>(9) For Group 1 and Group 2 aeroplanes: Within 3 months after the effective date of this AD, install the <b>FCGS SW X14 Standard</b> in accordance with the instructions of the MSB. | <br> | ATA SYSTEM: 27<br><b>TITLE: FLIGHT CONTROLS - PRIMARY FLIGHT CONTROL SYSTEM (PFCS) - DEFINE AND INSTALL FCGS SW X14 STANDARD REBOUND</b><br>SUMMARY |
|--|--|---|

In view of the discrepancy noted above, could EASA please confirm whether embodiment of SB A350-27-P078 satisfies the compliance requirements of paragraph (9) in AD 2025-0197?

**EASA response:**

**Please see answer to Comment #1.**

**Commenter 5: Starlux Airlines – Joshua Chang – 22/09/2025****Comment #5**

As the AIRBUS SB A350-27-P078 published, it could consider that will be the permanent eliminates the potential unsafe condition for FCRM contaminated.

SB A350-27-P078 is based on existed FCGS X14 STD to modify to FCGS X14 Rebound.

However, in the ESAS 2025-01987 paragraph (9) For Group 1 and Group 2 aeroplanes: Within 3 months after the effective date of this AD, install the FCGS SW X14 Standard in accordance with the instructions of the MSB.

Should it be FCGS SW X14 Rebound, not X14 Standard?

Paragraph (13) (14) , all the mentioned in EASA 2025-0197 meaning the FCGS SW X14 STD should be corrected FCGS SW X14 Rebound, is that correct?



***EASA response:***

***Please see answer to Comment #1.***

