

COMMENT RESPONSE DOCUMENT

EASA Final AD No.: 2026-0073

[Published on 07 April 2026 and officially closed for comments on 09 April 2026]

Commenter 1: Hainan Airlines – He Gen – 02/04/2026

Comment # 1

We are writing to seek clarifications and propose improvements regarding EASA AD 2026-0073 (issued 01 April 2026, effective 15 April 2026) applicable to Airbus A330 aeroplanes.

- a. Clarification on initial check for aircraft delivered outside the 76-day window
Paragraph (1) requires the initial operational check within 76 days after the AD effective date, but no requirement is provided for aircraft entry into service or delivered after this initial compliance window.
Could you confirm whether this AD can follow the logic of EASA AD 2026-0060 and apply different initial check requirements based on aircraft reference date? Please clarify the compliance time for these aircraft.
- b. Verification of AMM task number in paragraph (6)
Paragraph (6) refers to AMM task 28-21-51-710-812-A, which current AMM revisions do not contain this task number.
Please confirm whether this task number is a typographical error or a task applicable only to certain A330 sub-models?
- c. Clarification and proposed revision for paragraph (7)
Paragraph (7) states that AMM task 28-21-51-400-802-A satisfies the operational check required by paragraph (4).
Our understanding is that completing this installation task should also satisfy the paragraph (1) initial or repetitive operational check for the same affected part.
If correct, we suggest revising paragraph (7) as follows for consistency:
Accomplishment of AMM task 28-21-51-400-802-A “Installation of the fuel pump element” for an affected part is acceptable to accomplish an operational check as required by paragraph (1) and (4) of this AD for that affected part.*

Please confirm our interpretation and the proposed revision.



EASA response:

1A) Comment noted. For aeroplanes delivered by Airbus to the first operator after 30 June 2026 (AD effective date + 76 days) it is expected that Airbus will record compliance to the AD in the aeroplane documentation. Subsequent operational checks will be accomplished by the operator. No changes have been made to the Final AD in response.

1B) A correction of the AD has been issued on 07 April 2026, indicating that the relevant AMM reference is task 28-21-00-710-812-A ‘Operational check of standby pump automatic control’

1C) Comment not agreed. Paragraph (1) requires test for parts which, on the effective date of the AD, are already installed on an aeroplane. Parts installed after the effective date of the AD must be initially checked before next flight after installation as required by paragraph (4) – by reference to the AOT procedure – or as defined by paragraph (7) – by reference to AMM task. Subsequent checks must be accomplished as required by paragraph (1). No changes have been made to the Final AD in response.

Commenter 2: Deutsche Lufthansa AG – Lars Danzmann – 02/04/2026
Comment # 2

In reference to AD 2026-0073 Lufthansa would like to comment, that there is a typo in (6) Acceptable Method of Compliance. The mentioned AMM TASK “28-21-51-710-812-A” Operational check of standby pump automatic control” is incorrect. There is no such task. Correct task would be “28-21-00-710-812-A”.

EASA response:

Comment agreed. A correction (as indicated) of the AD has been issued on 07 April 2026.

Commenter 3: Cathay Pacific Airways Limited – Michelle MY Lee – 02/04/2026
Comment # 3

It is stipulated in EASA AD paragraph (6) that the accomplishment of AMM task 28-21-51-710-812-A 'Operational check of standby pump automatic control' is an AMOC for the operational check as required by AD paragraph (1).

CPA is unable to locate AMM task 28-21-51-710-812-A in the latest AMM version.

On the other hand, the AMM has a similarly named task – AMM TASK 28-21-00-710-812-A 'Operational Check of Standby Pump Automatic Control and a copy of this AMM is attached here for your reference.

CPA would be grateful if EASA can kindly review and confirm if the referenced AMM task should be 28-21-51-710-812-A or 28-21-00-710-812-A, and update the AD as required.

EASA response:

Comment agreed. See answer to comment #2.

Commenter 4: Sunclass Airlines – Paul Greenwood – 02/04/2026

Comment # 4

Following the release of EASA AD 2026-0073, for the Acceptable Method of Compliance, it lists **AMM 28-21-51-710-812-A** 'Operational check of standby pump automatic control'. Upon review, the reference in the AMM appears to be **28-21-00-710-812-A** 'Operational check of standby pump automatic control'.

Could you please confirm that there has been an error in the AD and the reference **28-21-00-710-812-A** is the correct task that should be used?

EASA response:

Comment agreed. See answer to comment #2.

Commenter 5: HI FLY CAMO – André Fanguero – 02/04/2026

Comment # 5

While reviewing the compliance instructions, we noted a discrepancy between the AOT and the AD regarding corrective actions:

- Airbus AOT A28L012-26 provides an alternative method, which allows for the swap of the pump in accordance with the MMEL.



- EASA AD 2026-0073, however, does not explicitly mention or adopt this alternative method in its mandated requirements.

Does EASA consider the pump swap IAW the MMEL, an acceptable means of compliance within the current wording of AD 2026-0073?

EASA response:

Comment noted: the AD requires to replace an affected pump (identified by FIN), but does not regulate whether the pump to be installed in that position is a spare part (referenced as “replace” in the AOT) or a fuel pump previously installed on that same aeroplane (referenced as “swap” in the AOT). Both options are acceptable to comply with the requirements of paragraph (3) of the AD. No changes have been made to the Final AD in response.

Commenter 6: Lufthansa Technik AG – Andreas Kröll 7 02/04/2026

Comment # 6

During the review of AD 2026-0073, I found an incorrect AMM Reference in AD para. (6).

- It currently reads: 28-21-51-710-812-A
- But it should read: 28-21-00-710-812-A

Please review and correct.

EASA response:

Comment agreed. See answer to comment #2.

Commenter 7: Aer Lingus – Dan Fanning – 02/04/2026

Comment # 7

Ref AD 2026-0073, EIN are completing the review and compliance document set up and wish to query an AMM reference in section 6 of the AD:



Acceptable Method of Compliance:

- (6) Accomplishment of aircraft maintenance manual (AMM) task 28-21-51-710-812-A 'Operational check of standby pump automatic control' for an affected part is acceptable to accomplish an operational check as required by paragraph (1) of this AD for that affected part.

EIN are unable to locate the AMM task noted and suspect this is the AMM task which is noted in AOT A28L012-26 sect 6.2 that will be introduced later in 2026.

6.2 IMPACTED DOCUMENTATION

A new AMM task covering the Operational check of the Standby Fuel Pump is expected to be released later in 2026.

Can EASA please confirm?

Also if that is confirmed, can operators request an Advance Copy of the AMM from Airbus prior to its release?

EASA response:

Comment agreed. See answer to comment #2.

Commenter 8: Qatar Airways – Prem SUBRAMANIAM – 02/04/2026**Comment # 8**

We would like to bring to your notice about the typo error under Acceptable Method of Compliance (Statement - 6)

Correct AMM reference - 28-21-00-710-812-A (instead of 28-21-51-710-812-A).

Kindly take note of it and initiate AD revision accordingly

EASA response:

Comment agreed. See answer to comment #2.

Commenter 9: Oman Air – Anwar Biland – 02/04/2026

Comment # 9

Subject AD para (6) AMOC is referring to AMM task , however OMR could not find this task in the AMM revision 69 . We found task 28-21-**00**-710-812-A instead. Please review and advise AMM reference for operational check of standby pump auto control.

EASA response:

Comment agreed. See answer to comment #2.

Commenter 10: China Southern Airlines Co. Ltd. – Zhoujiu Zhou – 07/04/2026

Comment # 10

We have some queries about this EASA AD:

- a. There seems no task no. 28-21-**51**-710-812-A in AMM mentioned in paragraph (6). Could you please help double check if there is some type error?
- b. In the AMM task 28-21-51-400-802-A described in paragraph (7), there seems no similar operation check mentioned in the AOT, nor are there similar test steps to the operation checks mentioned in paragraph (6). Therefore, could you please help explain why paragraph (7) can be used as an alternative to the operation check mentioned in the AOT or to the operation check in paragraph (6)?
- c. If paragraph (7) is correct, do you agree that the paragraph (4) does not make sense?

EASA response:

10A) Comment agreed. See answer to comment #2.

10B) The AMM installation task includes an operation check which is considered equivalent to the operational check defined by the AOT. The credit avoids a potential duplicate instruction of an operational check as part of the AMM installation procedure, and then the requirement to complete the operational check as defined by the AOT before the next flight. No changes have been made to the Final AD in response.

10C) Comment not agreed: The accomplishment of the AMM task is not mandated by the AD, and EASA cannot exclude that installation of an affected part might be accomplished using a different procedure (e.g., locally approved) which does not offer the same level of safety as the AOT procedure. No changes have been made to the Final AD in response.



Commenter 11: Trinity Airway – Chanyoung Kim – 07/04/2026*Comment # 11*

The AD includes a section titled “Acceptable Method of Compliance.”

In this regard, I would like to confirm whether an Acceptable Method of Compliance has a different meaning from an Alternative Method of Compliance (AMOC).

My understanding is that an Alternative Method of Compliance requires approval from the competent airworthiness authority.

Therefore, I would like to ask whether an Acceptable Method of Compliance also requires any separate approval or additional action before it may be used,

or whether the task described as an Acceptable Method of Compliance may be performed directly without any further approval or action.

In addition, regarding paragraph (6) of the Acceptable Method of Compliance section, I would like to ask about AMM task 28-21-51-710-812-A, “Operational check of standby pump automatic control.”

We were unable to find this AMM task in Airbus documentation, and therefore I would like to confirm whether this task applies only to a specific A330 variant.

To summarize, my questions are as follows:

Q1.: What is the exact meaning of Acceptable Method of Compliance?

Specifically, does it require any separate approval or additional action before it can be used?

Q2.: Does AMM task 28-21-51-710-812-A, as referenced in paragraph (6) of EASA AD 2026-0073, apply only to a specific A330 model or variant?

EASA response:***Q1 : Comment noted.***

As a general principle, the ‘Acceptable Method of Compliance’ listed in an Airworthiness Directive is deemed sufficient to declare the compliance to the AD whenever accomplished. An ‘Alternative Method of Compliance’ considers dispositions not identified within the AD and needs to be formally accepted by the competent National Aviation Authority to declare the compliance to the AD.

AD 2026-0073 (and subsequent correction) requires accomplishment of operational checks i.a.w. the instructions of an Airbus AOT.

The AD clarifies that, if that AMM task is accomplished, that can be considered equivalent to the action required by paragraph (1) of the AD. (See remark section, item #1). Since that equivalency is already identified in the AD as “acceptable method of compliance”, there is no need for further formal approval.



However, those different ways to comply with an AD task have been sometimes identified in certain AD as “Acceptable Method of Compliance”, and as “Alternative Method of Compliance” in other ADs, but, as long as that information is provided in the section “Required Action(s) and Compliance Time(s)” of the AD, there is practically no difference.

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

Q2) Comment agreed. See answer to comment #2.

Commenter 12: Iberojet – Iker Alonso – 07/04/2026

Comment # 12

We have the following enquiry regarding AD 2026-0073:

Paragraph (6) of this AD refers to AMM task 28-21-51-710-812-A ‘Operational check of standby pump automatic control’, but we have not been able to find this AMM task in Airbus manuals. Instead, we have found the AMM task 28-21-00-710-812-A with the same title ‘Operational check of standby pump automatic control’.

Could you please confirm or deny if there has been a typo (highlighted in red and green colours, respectively) in the AMM task reference indicated on paragraph (6)?

EASA response:

Comment agreed. See answer to comment #2.

Commenter 13: PLUS ULTRA LÍNEAS AÉREAS S.A. – Rodolfo Salvador Arciles Najarro – 07/04/2026

Comment # 13

The purpose of this email is to request clarification regarding EASA AD 2026-0073, as we have noted that step (6) of the AD, which refers to an acceptable method of compliance, states the following:

“Accomplishment of aircraft maintenance manual (AMM) task 28-21-51-710-812-A ‘Operational check of standby pump automatic control for an affected part is acceptable to accomplish an operational check as required by paragraph (1) of this AD for that affected part”

Regarding of the above, could you please clarify the following:



- a. We believe that the reference AMM 28-21-51-710-812-A mentioned in the AD is incorrect and contain and typo error.
- b. Could you confirm if the correct reference is AMM 28-21-00-710-812-A “Operational Check of Standby Pump Automatic Control”.
- c. If both points mentioned above are correct; Could you please release a new revision of this AD so that we can comply with it as soon as possible?

EASA response:

Comment agreed. See answer to comment #2.

Commenter 14: China Southern Airlines Co. Ltd. – Zhoujiu Zhou – 09/04/2026

Comment # 14

The test in the AMM installation task is [AMM TASK 28-25-00-869-801\(Do a ground fuel transfer to move fuel from the applicable fuel tank\)](#)

Then could you please double check and confirm if the above test [AMM TASK 28-25-00-869-801](#) in the AMM installation is considered equivalent to the operation check defined by the AOT?

EASA response:

Comment not agreed. The complete AMM installation task is accepted as alternative to an operational check required after installation. See also EASA answer to comment 10B.

Commenter 15: Hainan Airlines – He Gen – 13/04/202

Comment # 15

1. Compliance issue:
 - a. Paragraph (4) requires an operational check per AOT before next flight after installation of an affected part.
 - b. Paragraph (6) specifies that the listed AMM task satisfies the operational check required by paragraph (1).
 - c. Since the AMM task in paragraph (6) is an acceptable compliance method for paragraph (1), it should also be acceptable for the post-installation check required by paragraph (4).



- d. However, the current text does not clearly state this linkage, leading to text inconsistency and compliance interpretation risk: When an affected part is installed, AOT or AMM task 28-21-51-400-802-A(paragraph (7)) must be done to comply with the Parts Installation requirement. AMM task 28-21-00-710-812-A cannot be used as an acceptable method of compliance.

Our Proposal: If our understanding is correct, to eliminate ambiguity, we request EASA consider either one of the following revisions:

Option 1 (Revise Paragraph (4)):From the effective date of this AD, it is allowed to install an affected part on an aeroplane provided that, before next flight after installation, it passes an operational check as required by paragraph (1) and, thereafter, the operational checks as required by paragraph (1) of this AD are accomplished for that affected part.

Option 2 (Revise Paragraph (6)):Accomplishment of aircraft maintenance manual (AMM) task 28-21-51-710-812-A “Operational check of standby pump automatic control” for an affected part is acceptable to accomplish an operational check as required by paragraph (1) and (4) of this AD for that affected part.

Request: Please confirm whether our understanding is correct and whether either proposed revision is acceptable for official compliance.

Your clarification will help us ensure full and consistent compliance with this AD.

EASA response: Comment not agreed. See EASA answer to comment 1C

Commenter 16: Tibet Airlines – Yang Ling Jun – 27/04/2026

Comment # 16

In definitions, we read the following:

Affected part: Standby fuel pump, any part number eligible for installation in accordance with Airbus instructions, Functional Identification Number (FIN) 112QA1 and FIN 112QA2.

If the new part number of the standby fuel pump is added in the subsequent IPC, does it belong to an affected part?

EASA response:

Comment noted. As the AD does not identify any subpopulation pre and post AD issuance, EASA confirm that any P/N added in the IPC after the AD is issued must be considered as affected part.

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

