

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2026-0083

Published on 22 April 2026 and officially closed for comments on 20 May 2026

### *Commenter 1: Reliance Commercial Dealers Ltd. – Victor Dsouza – 27/04/2026*

Reference may please be made to EASA AD No. 2026-0083 dated 22nd April, 2026 regarding "ATA 55 Stabilizers Rudder Overweight Detection Inspection".

As per "Inspection(s) / Corrective Action(s):" Para (1)"

Quote:

(1) From the effective date of this AD, within 20 flight cycles after an airframe vibration event reported by the flight crew through a Vibration Reporting Sheet (VRS) or equivalent document containing the same data (see Note 1 of this AD), accomplish the in accordance with the instructions of (section 5.4.1. of) the AOT."

Un-quote.

Our understanding is that the subject AD is to be continuously monitored for compliance as per referenced Airbus Alert Operators Transmission (AOT) A55N004-25 within the timescale mentioned above, should there be an event wherein rudder vibrations are reported by flight crew.

However, there exists an element of unclarity with regards to the compliance. Does the AD mandate continuous monitoring/compliance as interpreted above OR is the AD to be monitored as a one-time compliance if rudder vibrations are reported within 20 FC after the effective date of the AD.

You are kindly requested to confirm and advise on the above.

***EASA response:***

***Comment noted.***

***The AD has to be monitored continuously and the required actions come into place only if there is a VRS received. After that VRS was received within 20 FC the actions as specified in the AD have to be accomplished.***

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



**Commenter 2: Deutsche Lufthansa AG – Martin Siring – 29/04/2026****Comment # 2**

Lufthansa CAMO Engineering would like to request clarification on the following points related to EASA AD 2026-0083.

1. Paragraph (1) of the AD states (...) reported by the flight crew through a Vibration Reporting Sheet (VRS) or equivalent document containing the same data (see Note 1 of this AD), (...). As Note 1 describes the general applicability of the AD, we would appreciate clarification on the intended purpose of this reference and its relevance.
2. We have observed a trend toward shorter timeframes between AD publication and effective dates. Since this technical issue would have been present for an extensive timeframe (potentially since the start of der A320Fam program), justification for a shortened timeframe of one week from release to effective date for both the AOT and the AD is difficult to follow.
3. We consider the content of Note 1 to be of substantial relevance (also refer to question 5.). As its current “Note” status may reduce its importance, we would like to suggest a group assignment for A/C with PRE and POST Mod 156859 Rudder installed.
4. The AD is based on an Airbus AOT that several operators have reported to contain inconsistent actions (also refer to question 5.), typographical errors, and other inaccuracies. Airbus was made aware of these concerns during the two webinars following the AOT release. Given the complexity of the document and the short timeframe between publication and effective date, we kindly ask EASA to consider how such inconsistencies should be addressed, noting that AOTs are often treated operationally as equivalent to an AD.
5. The AOT details weight limits for POST Mod 156859 rudders while also stating, based on an analysis by Airbus, that these parts were excluded from a potential overweight condition. Yet, table 4 of the AOT lists weight limits, which could imply the need to weigh all installed POST Mod rudders in the event of the part being confirmed as source of airframe vibration. We kindly request clarification, particularly as both the AOT and AD state that POST Mod rudders can be excluded to exceed weight limits and hence not act as a potential source of reported airframe vibration.



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

1. *See the answer to point 3.*
2. *The compliance time is an outcome of risk analyses performed by the applicant with EASA experts. As written in the AD, the AD actions are only necessary once a VRS or equivalent are triggered, therefore there is no action until that is the case. Regarding the time from issuance to effective date, this is depending on the AD type. As this is a final AD, from issuance to effective date, the time period of 7 days is standard.*
3. *The Note was added as clarification in the AD, as this aligns also with the AOT. It was EASAs decision to not implement Groups, as if there would be Groups added for the specific paragraphs, the determination of the Group for each aeroplane would need to have been accomplished on the effective date of the AD, to know for each operator which are the applicable actions. Therefore the addition of groups was determined as a burden to operators.*
4. *This is noted. Airbus is currently in the process of revising that AOT.*
5. *The current AOT applicability is for pre MOD rudder only. It is expected that similar requirements will apply for pre and post MOD rudder in the future. An SB may be published by Airbus requiring the weighing of the rudder independently of reported airframe vibration event. Therefore AD actions are limited to pre MOD rudder in accordance with the AOT instructions.*

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

**Commenter 3: Air Arabia – Arsenio Jr. Carao Reyes – 19/05/2026**

**Comment # 3**

Air Arabia would like to request clarification regarding the **EASA AD 2026-0083R0 (Stabilizers – Rudder Overweight Detection – Inspection)**.

AD 2026-0083 Note 1 states that: "An aeroplane which, during the airframe vibration event referenced in paragraph (1) of this AD, is equipped with a rudder in post Airbus modification 156859 configuration, is not affected by the requirements of paragraphs (1) to (3) of this AD." However, Airbus AOT A55N004-25 Para. 5.5 provides a terminative action in which it was stated: "The installation of a rudder with a documented weight that falls within the limits specified in the AOT is a terminative action."



Air Arabia raised dossier 81758110 to Airbus to clarify the case of MSN 05984. Airbus confirmed that the rudder weight was within the AOT limits and that, provided no subsequent rudder replacement, repair, or repaint has been carried out, no further action is required within the scope of the AOT. Also, for MSN 04848, the rudder has not been repaired, and the paint thickness measurement was performed and confirmed to be within the AOT limits. Therefore, provided no further repair or repaint is carried out on the rudder, the AOT should not become applicable again for the same rudder condition.

Based on the above, Air Arabia would like to request EASA clarification on the following points:

1. For an aircraft fitted with a pre-mod 156859 rudders, if the AOT has been fully complied with and the rudder weight is documented within the AOT limits, with no subsequent rudder replacement, repair, or repaint, can the requirements of EASA AD 2026-0083 be considered terminated/closed for that aircraft or rudder?
2. If the AD remains applicable because the rudder is Pre-Mod 156859, can the AD compliance status be recorded as “complied with / no further action required” if it complied with AOT terminative action?
3. What should be considered as the terminating action for the EASA AD 2026-0083? The subject AD does not clearly define any specific terminating action.
4. In the event of a future airframe vibration report on the same aircraft, where the rudder weight is already known and documented within the AOT limits and no subsequent repair/repaint/replacement has occurred, should the operator consider that no further AD action is required, or should the AD be in open status again?
5. The AOT allows operators to have 20 FC window time to perform the Rudder Identification process (AOT Para. 5.4.1.1.). Airbus also confirmed in dossier 81758110/006 that, following an airframe vibration event, the AOT is triggered, and the 20 FC allowance can be used to identify whether the installed rudder is Pre-Mod or Post Mod 156859. However, EASA AD 2026-0083 Note 1 states that only aircraft equipped with a Post-Mod 156859 rudder are excluded from the requirements of AD Para. (1) to (3). With this, Air Arabia kindly requests EASA clarification on how the 20 FC allowance should be applied at the event of Airframe Vibration in order to comply with AD requirements, considering that the rudder Mod status may only be confirmed after completion of the AOT rudder identification process



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

***The actions provided in the AD are only applicable in case a rudder vibration event was reported. Thereafter within 20 FC the paragraph (1) has to be accomplished. In case a rudder vibration event was reported, the first action in the AD is to determine the rudder configuration. In case no “affected” rudder configuration is determined, there are no actions required by this AD. For certain configurations (post mod 156859), the Note 1 already provides guidance. Please note that if the aeroplane changes rudder configuration, the AD may become applicable again.***

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

**Commenter 4: Easy Jet – Andrew Knight – 19/05/2026**
**Comment # 4**

easyJet would like to provide the following feedback and raise several concerns regarding the implementation requirements associated with EASA AD 2026-0083, specifically in relation to Remark #2 and the mandated actions defined in Airbus AOT A55N004-25.

**Fleet Impact and Baseline Data Availability**

As per the requirements of AOT A55N004-25, easyJet currently has 193 affected rudders installed across 190 aircraft. Airbus did not provide initial rudder weight data at aircraft delivery, resulting in a full-fleet exposure and a current situation where all 190 aircraft must be considered within scope of the AD/AOT. This creates a significant operational and maintenance burden.

The primary concern relates to the requirement to initiate the AOT inspection and associated actions following a single vibration report submitted by flight crew.

Based on easyJet’s operational experience:

It is not uncommon for isolated vibration reports to be raised by crew without recurrence. In many such cases, aircraft are placed under monitoring (“watch”) conditions prior to initiating troubleshooting procedures in accordance with the TSM.

A significant proportion of these events are subsequently identified as spurious or non-repeatable, with no further reports over extended periods.



Under the current AD and AOT requirements, any single vibration report triggers immediate initiation of inspections and checks, and potential rudder removal and re-weighing within a 400FC timeframe.

This approach does not allow operators sufficient opportunity to validate the persistence or reproducibility of the vibration event or differentiate between genuine technical issues and transient or spurious reports.

As a result, this requirement could lead to unnecessary maintenance actions, increased downtime and operational disruption, and inefficient allocation of maintenance resources without a corresponding safety benefit.

easyJet respectfully requests that EASA consider revising the AD to introduce a short validation period prior to mandatory AOT initiation.

Specifically, we propose:

- A 24-hour observation window following the initial vibration report, during which:
- The aircraft may continue to operate under monitoring conditions, and additional occurrences (if any) can be assessed and AD/AOT issued.

If multiple vibration reports occur within this 24-hour period, the AOT actions would then be initiated immediately.

If no further reports occur, the initial event may reasonably be treated as spurious, and no AOT action would be required.

***EASA response:***

***Comment not agreed.***

***The way the AD is written, the requirements only become applicable once a rudder vibration event is reported. This was done to ease the implementation of that AD, because it does not require to (at the effective date of the AD) determine the rudder configuration for each affected aeroplane.***

***The compliance time is a result of a risk assessment done by the applicant together with the EASA experts. For compliance time extensions, please contact your responsible NAA.***



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

***Commenter 5: LATAM – Cristina Milena Gomez Meneses – 19/05/2026***

***Comment # 5***

LATAM would like to refer to AD 2026-0083 and the associated documentation (AOT A55N004-25). In this context, we would like to share the following comments and suggestions for your consideration in future revisions or related material:

1. The AD and the AOT state that the process should start from the first VRS. However, in many cases there are reports where vibration is not confirmed. Therefore, we believe the 20 FC timeframe should be counted from the confirmation of vibration, rather than from the first report.
2. Historically, LATAM has not needed to weigh or replace the rudder to resolve vibration events; corrective actions have consisted of replacing servos and hinges. We suggest that, if vibration is eliminated through maintenance actions, a rudder weight evaluation should not be required, or alternatively, that a timeframe be granted to defer this activity until the next scheduled heavy maintenance visit.
3. LATAM does not have the rudders' as-built weights from the manufacturer. Accordingly, we consider it reasonable to implement preventive weighing for all rudders (e.g., every 36 MO), but not as a requirement to address a vibration event under a deadline that shifts the work to line maintenance and, operationally, may not allow reaching a heavy maintenance check.
4. DFDR data is retained for approximately 25 FH. Considering the 20 FC requested by the AD/AOT to send information to AIB (paragraph (3)), there is a relevant likelihood that the DFDR will not contain the parameters from the flight during which the vibration occurred, potentially preventing the effective achievement of the intended investigative objective. This issue is consistent with the first point.
5. LATAM understands the unsafe condition; however, there are MPD tasks that already mitigate the potential rudder overweight, such as:
  - MPD 554008-01-1: Special Detailed Inspection (Thermographic) of the Honeycomb Core of the Rudder Side Panels, LH/RH (every 72 MO)
  - MPD 272400-02-1: Functional Check of Rudder Servocontrol Bearings for Excessive Play and Condition (every 36 MO)

***EASA response:***



**1 And 2. Comment not agreed. The compliance time is a result of a risk assessment done by the applicant together with the EASA experts.**

**3. Comment noted. Refer answer to comment #2.3**

**4. Comment noted.**

**5. Comment noted. These task references are out of the scope of the AD.**

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

### **Commenter 6: American Airlines – Lucas Yen – 20/05/2026**

#### **Comment # 6**

American Airlines (AAL) reviewed EASA AD 2026-0083 and would like to make the following comments regarding paragraphs (1) and (2).

The AD requires operators to accomplish the Airframe Vibration Troubleshooting procedures in accordance with the instructions of section 5.4.1 of Airbus AOT A55N004-25 Rev original, and to perform the troubleshooting and follow on actions within the compliance times specified in the AOT.

AAL would like to report to EASA that the original revision of the AOT cannot be accomplished as written. The flow chart in AOT Appendix 3 and the Vibration Reporting Sheet in Ref [1] TSM 05-50-00-810-801 say only manipulating rudder trim, not the rudder pedals, can be used to confirm the rudder as a source of vibration (Type 5). However, the Decision Tree in Ref [1] TSM allows both the use of rudder pedals and/or trim to stop the vibration to confirm the rudder as a source of vibration (Type 5). AAL requests that the use of rudder, in addition to the rudder trim, to determine if there is Type 5 corrective action.

Paragraph 5.4.1.2 also states that based on the Decision Table results, if the rudder score is more than 20 and in the top 3 highest scores, the rudder is suspected as a source of vibration. AAL would like to note that, based on the Decision Table, if any flight control is suspected as a source of vibration, that the rudder will have a score of greater than 20, thus resulting in repetitive servo-control tests. Historically, AAL has seen data to suggest that elevator vibrations have been a source of vibrations is related to the flight controls. AAL requests that the requirement of subsequent rudder inspections be considered if the rudder is not the highest value in the decision table.

Also in Paragraph 5.4.1.2, Airbus specifies cases of rudder vibration in the decision tree as those being (Type 5). However, Type 15 (rudder servo control) and Type 16 (rudder pedals) are also rudder related. To prevent confusion and unnecessary action with these Types, AAL requests the AOT to



specifically state that the actions defined in Paragraph 5.1.3. are not required if the decision tree identifies Type 15 or Type 16.

Paragraph 5.1.2 states that if the rudder is suspected as a source of Airframe Vibration, “the servo control operational test must be done at intervals of 25 flight cycles until the rudder is excluded as a source of vibration, or, if the rudder is confirmed as a source of vibration, until the rudder weight assessment in paragraph 5.4.3.2 is done.” This requirement does not allow for credit for the servo control operational test to be taken if it is accomplished before 25 FC. AAL requests that the verbiage be changed to say “the servo control operational test must be done **within** intervals of 25 flight cycles until the rudder is excluded as a source of vibration [...]”.

In paragraph 5.1.3, Airbus states “when the rudder is confirmed as the source of vibration, follow the instructions in accordance with paragraph 5.4.3.1 (Rudder Freeplay check) within 50 FC.” Airbus has not clarified from when the 50 FC timer starts. AAL questions if the 50 FCs start from the initial vibration report or after getting the confirmation. AAL requests clarification to when operators need to perform the Rudder Freeplay check.

Paragraph 5.4.3.1 says that the rudder servo control and hinge bearing Freeplay check is to be performed “in accordance with AMM Ref [7]”. Ref [7] in the AOT is a TSM tasks. AAL requests the AD to correct this typographical error.

In Appendix 4 of the AOT, Airbus provides maximum weight requirements for post-MOD 156859 rudders. However, Airbus has stated in the AOT that the post-MOD rudder is not affected by the requirements of this AOT and confirms so in Appendix 3 and in paragraph 3.2. AAL requests clarification to their inclusion of their weight and data into the AOT if they are not the subject of the AOT/AD.

AAL also requests clarification to the AD effectivity. In paragraph 3.2 of the AOT, Airbus states that post-MOD 156859 rudders have been excluded from the requirements of the AOT. This statement holds throughout section 5 of the AOT, including in section 5.4.1.1, where Airbus states, “For aircraft with a rudder installed not identified in Appendix 1 of this AOT, no further actions are needed.”

Appendix 1 of the AOT only lists pre-MOD 156859 rudder MPNs. Therefore, AAL requests the Effectivity of the AD be updated to exclude aircraft with post-MOD 156859 rudders installed.

Paragraph (1) of EASA AD 2026-0083 states “within 20 flight cycles after an airframe vibration event reported by the flight crew through a Vibration Reporting Sheet (VRS) or equivalent document containing the same data”. This same verbiage appears in paragraph 5.1.1 of the AOT. AAL requests EASA add the definition of what is an “equivalent document.”



AAL has noted instances where the VRS is only partially completed when submitted. This condition is neither addressed in the AOT nor the AD. The AOT assumes a fully completed VRS is submitted. AAL requests direction from EASA for what operators should do if only a partially completed VRS is submitted.

AAL is aware that a revision to the AOT by Airbus is in the works. While the EASA AD does allow for future revision of the AOT to be used to comply with the AD requirements, and due to the errors identified in the original revision of the AOT, AAL requests that the revision of this AD mandate Revision 01 and future revisions in lieu of the original revision of the AOT.

***EASA response:***

***Comment noted.***

***Please note that Airbus is currently in the process to revise the AOT that will clarify those remarks.***

***Regarding the applicability in the AD, please see the answer to comment 3.***

***Equivalent document is meant to be any form of official report that was made by the Flight Crew about a vibration event, other than the VRS.***

***Regarding the quality of the filling of a VRS, this can not be managed via AD or AOT and is the responsibility of the operator/flight crew.***

***AD supersedure to mandate AOT rev1 is not deemed necessary.***

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

