

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-007

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Commenter 1: SwiftAir – Lucía Camero Espinosa– 05/02/2026

Comment # 1

At Swiftair, we are evaluating the embodiment of SB ATR72-21-1065 for our ATR72-600 fleet. We have some doubts regarding the removal of the IASC and our capacity and capability to complete the modification (we are concern to the high possibility to damage the unit).

We had propose to Liebherr (equipment manufacture and VSB owner) to do a fleet campaign in order to perform the equipment retrofit in their workshop by one unit on loan meanwhile complete the retrofit. At this time, Liebherr only propose the option of giving us the necessary tools and labels to perform the modification.

Could you give a solution to this issue.

EASA response:

EASA acknowledges the commenter's concerns regarding the embodiment of SB ATR72-21-1065 and the associated risks perceived in performing the Integrated Air System Control (IASC) software modification in-house.

However, the compliance time and the requirement to accomplish the modification are integral elements of the airworthiness directive. They form part of the corrective action necessary to restore the airworthiness status of the affected fleet. For this reason, EASA cannot tailor the wording, scope, or compliance provisions of an AD to the operational or organisational circumstances of an individual operator.

EASA notes the operator's discussions with Liebherr regarding the possibility of a fleet-wide retrofit campaign performed at the manufacturer's facilities. While such arrangements may be pursued on a voluntary and contractual basis between the operator and the equipment manufacturer, they cannot be mandated or incorporated into the AD text.

To address the operator's concerns about capability and potential risk of equipment damage, EASA recommends engaging a maintenance organisation appropriately approved and competent to perform the required modification in accordance with the applicable instructions.

Alternatively, the operator may consult its national aviation authority regarding the flexibility provisions contained in the EASA Basic Regulation (Regulation (EU) 2018/1139), or may apply for an Alternative Method of Compliance (AMOC) if a different means of achieving the required level of safety can be demonstrated.



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

