

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-004

[Published on 07 January 2025 and officially closed for comments on 04 February 2025]

**Commenter 1: JAL Engineering Co., Ltd. – Masaya Tonami – 08/01/2025**

### Comment # 1

JAL reviewed the PAD No. 25-004 to revise the approved AMP by incorporating the limitations, tasks and associated thresholds and intervals described in the Airbus A318/A319/A320/A321 Airworthiness Limitations Section (ALS) Part 2 Revision 11.

JAL would like to ask about the relationship between this AD and EASA AD 2024-0031 and AD 2024-0208.

Despite this AD supersedes the EASA AD 2024-0031 and EASA AD 2024-0208 described in Supersedure column of this AD, this AD retains the requirements of EASA AD 2024-0031 and AD 2024-0208 in the Reason column in this AD.

Could you advise why this AD still retains EASA AD 2024-0031 and EASA AD 2024-0208 because the ALS Part 2 Revision 11 includes all limitations in previous ALSs?

In addition, JAL operates the Airbus A321-231 which was converted to Freighter (P2F) by Elbe Flugzeugwerke GmbH(EFW) STC 10071994.

For the P2F airplanes, the EFW Document No. A320/A321P2F-ALS\_Part2-ALI-ENV revised, deleted or newly added the limitation from the Airbus ALS Part 2.

As of now, the P2F airplane not only JAL but also all P2F in worldwide are on non-complied condition to the EASA AD 2024-0031 because an AMOC Letter for EFW Document No. A320/A321P2F-ALS\_Part2-ALI-ENV Rev. 7 and Rev.8 covers the Airbus ALS Part 2 Rev.10 required by EASA AD 2024-0031 is not published.

JAL would like EASA to consider to involve the EFW Document No. A320/A321P2F-ALS\_Part2-ALI-ENV for this AD and/or EASA AD 2024-0031 comply as Credit.

Inquiries to EASA,

1. Could you advise why this AD still retains EASA AD 2024-0031 and EASA AD 2024-0208 because the ALS Part 2 Revision 11 includes all limitations in previous ALSs?
2. JAL would like EASA to consider to involve the EFW Document No. A320/A321P2F-ALS\_Part2-ALI-ENV for the P2F airplanes converted by Elbe Flugzeugwerke GmbH(EFW) STC 10071994 to this AD and/or EASA AD 2024-0031 comply as Credit.



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

1. **Correct. This AD is mandating requirements, which were already mandated by the superseded ADs, meaning the requirements from the superseded ADs are now incorporated in this AD.  
The new Revision of the ALS does include all limitations from the previous ALS Issues/Variations for that ALS Part 2.**
2. **AMOC issued to a superseded AD are no longer valid. It is expected that the task previously included in the ALS are now addressed in the AMP by the operator. If so, to show compliance with the new AD, an operator is only required to show compliance to the new and/or more restrictive tasks, as defined in the AD, for which no AMOC is (yet) available. See Paragraph (4). If this is not accomplished, a new AMOC should be applied for.**

**No change was made to the final AD in response to that comment.**

