

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-026

[Published on 03 February 2025 and officially closed for comments on 03 March 2025]

Commenter 1: Delta Air Lines, Inc.– Michael D. Tharp / Vance Mitchell – 25/02/2025

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-026, dated 03 Feb 25

(B) Airbus Service Bulletin (SB) A320-53-1519 R00, dated 18 Nov 24

Comment #1

Commenter Request

Modify Ref (A) PAD, Required Action(s) and Compliance Time(s), to add inspections actions for applicable aircraft over the specified threshold.

Request justification

Para (1) of Ref A requires operators to perform an inspection in accordance with the instructions of the ISB before exceeding 60,000 FH or 30,000 FC, whichever occurs first, since aircraft first flight. The nature of the ISB ensures the structural integrity of the aircraft until it reaches its Design Service Goal (DSG). However, the compliance time is not set up for aircraft past the DSG, and Ref (A) applicability lists all aircraft regardless of accumulated FH/FC since aircraft first flight.

Example: DAL has A319 and A320 aircraft that are flying into ESG1 and ESG2, respectively, and are over the stated threshold given in Ref (A).

List paragraphs that change; describe (nonobvious)changes

- Required Action(s) and Compliance Time(s):
 - Specify action to be taken for aircraft over the (assumed) DSG limit

Or

- Coordinate with Airbus the TC Holder the revision of the SB Ref (B) to harmonize the TOA
- Issue the proposed AD Ref (A) upon confirmation of the SB Ref (B) revision



Comment #2Commenter Request

Modify Ref (A) PAD, Required Action(s) and Compliance Time(s), differentiate between Ref (B) inspection options Request justification.

Request justification

Ref (B) includes two options for operators to perform inspections of the affected areas. Although both options have the same initial inspection threshold, both have separate inspection methods and repetitive inspection interval requirements.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s)

- If Inspection Option 1 of the applicable SB is selected...
- o If Inspection Option 2 of the applicable SB is selected...

EASA response:**Comment #1**

Comment partially agreed. Table 1 was added to the AD, to specify the initial compliance time for A318 aeroplanes in paragraph (5) of the AD. As a reminder - the affected population of this AD are post production MOD 157159 aeroplanes.

It is to be noted that the affected population (A319, A320 and A321) are all modified wing for Sharklet installation and the current MPPT for this population at time of this AD publication is limited to 48000FC 96000FH. A318 CEO has a MPPT at 48000FC 60000FH.

Comment #2

Comments noted.

Paragraph (3) requires the rototest inspection, while paragraph (4) offers to use the HFEC inspection. The interval of the inspection is adapted accordingly as specified in paragraph (4) of this AD.

No change was made to the final AD in response to this comment #2.

Commenter 2: Lufthansa CityLine GmbH – Reka Leingruber – 18/02/2025

Comment # 2

As clarification of the Applicability of EASA PAD 25-026, we would like to raise a question. It is written by Applicability paragraph in the mentioned PAD “...all manufacturer serial numbers (MSN) up to MSN 09287 inclusive on which Airbus modification (mod) 157159 is embodied in production...” where it is not evident which criteria is meant:

“...all manufacturer serial numbers (MSN) up to MSN 09287” and “inclusive on which Airbus modification (mod) 157159 is embodied in production...”

OR

“...all manufacturer serial numbers (MSN) up to MSN 09287 inclusive” and “on which Airbus modification (mod) 157159 is embodied in production...”

Could you please provide us a clear statement of the Applicability in the upcoming AD.

EASA response:

Comment agreed.

The second understanding is correct.

The Applicability was changed accordingly: “[...] up to MSN 09287 inclusive, on which Airbus [...]”. Furthermore, the Airbus modification 157159 can be further explained with: “A319, A320 and A321 CEO and NEO modified wing; and A318 CEO classic wing”.

The Applicability of this AD was changed in response to this comment.

