

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-028

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Commenter 1: Delta Air Lines – Michael D. Tharp / Gabriel Segura – 07/02/2025

Comment # 1

Comment A

Commenter Request

Modify Ref (A) PAD, paragraph (2), from (original text):

*“If, during the inspection as required by paragraph (1) of this AD, **any discrepancy** is detected, as defined in the SB, before next flight, contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly.”*

To state (modified text):

*“If, during the inspection as required by paragraph (1) of this AD, **any non-nominal hole**, as defined in the SB, before next flight, contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly.”*

Request justification

The use of the word “discrepancy” includes any type of damage, not only non-nominal holes (which is the condition the SB is looking for and defines the dimension of a nominal hole). Please note that the use of coma “,” between the word “detected” and “as” in this sentence can imply that discrepancy is a separate concept that “as defined in the SB” and it could be interpreted that “as defined in the SB” pertains to contacting airbus before next flight and not the discrepancy that the SB is looking for. This can lead operators to contact airbus for any discrepancy that is not within the scope of the AD (e.g. paint damage).

List paragraphs that change; describe (nonobvious) changes

Paragraph (2)

Comment B

Commenter Request

Modify Ref (A) PAD, paragraph (3), from (original text):



*"If, during the inspection as required by paragraph (1) of this AD, **no discrepancy** is detected, before next flight, accomplish a rototest inspection at the affected area, in accordance with the instructions of the SB."*

To state (modified text):

*"If, during the inspection as required by paragraph (1) of this AD, **all holes are Nominal as defined in the SB**, before next flight, accomplish a rototest inspection at the affected area, in accordance with the instructions of the SB."*

Request justification

The use of the word "discrepancy" includes any type of damage, not only non-nominal holes (which is the condition the SB is looking for and defines the dimension of a nominal hole). This can lead operators to contact airbus for any discrepancy that is not within the scope of the AD (e.g. paint damage).

List paragraphs that change; describe (nonobvious) changes

Paragraph (3)

Comment C

Commenter Request

Modify Ref (A) PAD, paragraph (6), from (original text):

*"Accomplishment **of a repair** of each fastener hole of an affected area of an aeroplane in accordance with **the instructions of the SB (R53370370)**, accomplished before next flight after having passed (no discrepancy found) a rototest inspection of that affected area, as required by paragraph (3) of this AD, constitutes terminating action for the repetitive inspections as required by this AD for that affected area of that aeroplane."*

To state (modified text):

*"Accomplishment of **the cold expansion** of each fastener hole of an affected area of an aeroplane in accordance with the instructions of the **repair drawing Number R53370370 as stated in the SB**, accomplished before next flight after having passed (no discrepancy found) a rototest inspection of that affected area, as required by paragraph (3) of this AD, constitutes terminating action for the repetitive inspections as required by this AD for that affected area of that aeroplane."*

Request justification

Even though the SB defines the modification of the holes per repair DWG R53370370 as a "repair". Since the original condition of the fastener holes was not found to be enlarged or deformed and was found to be crack free per the roto test. The use of the word repair implies that there was damage found. Which is not the case. Thus, explicitly stating that the cold expansion of the holes per the repair DWG in lieu of stating "repair" can avoid confusion.

List paragraphs that change; describe (nonobvious) changes

Paragraph (6)



Comment DCommenter Request

Add an exception paragraph (7) stating that reporting per the SB is not required for compliance (RC).

Request justification

Airbus will have this data available thru the tech request system when operators report either 1- non-nominal holes, or, 2- crack indications as this is required per the AD.

Reporting data to Airbus in addition to the coordination via Tech Request costs operators significant man hours of labor. DAL feels that the use of the labor to gather this data should be responsibility of Airbus since they will have the data in the tech request system and the reason for this work is due to a fault in the manufacturing process.

List paragraphs that change; describe (nonobvious) changes

New paragraph (7)

EASA response:**Comment A**

Comment partly agreed. The wording was changed to “[...] any discrepancy, as defined in the SB, is detected, [...]”. This ensures that those discrepancies as defined in the SB are addressed. The inspection required by this AD in paragraph (1) specifies already, that only the nominal diameter of the affected area is meant.

Comment B

Comment not agreed. See answer to Comment A. The inspection required by this AD in paragraph (1) specifies already, that only the nominal diameter of the affected area is meant and only discrepancies during the inspection as required by paragraph (1) of this AD is meant.

No change was made to the final AD in response to Comment B.

Comment C

Comment not agreed. EASA uses the wording from the Airbus SB to avoid confusion of operators when comparing the AD to the SB.

Comment D

Comment not agreed. The EASA AD does not require reporting.

