

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-031

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

Commenter 1: AIR BUSAN – Hyunmin Moon – 18/02/2025

Comment # 1

Regarding PAD 25-031, Please check the paragraph (2) of this AD.

Groups: Group 1 aeroplanes are those on which the modification SB was accomplished before 6 100 FC since the aeroplane first flight.

Group 2 aeroplanes are those which are not Group 1 aeroplanes.

- (2) For Group 2 aeroplanes: After modification of an aeroplane (before 6 100 FC since aeroplane first flight) in accordance with the instructions of the modification SB, the next inspection as required by paragraph (1) of this AD for that aeroplane can be deferred until 53 900 FC since embodiment of the modification SB.

Para (2) is applicable to Group 2 aeroplanes. But, in accordance with the definition for GROUPS, Group 1 aeroplanes are those on which the modification SB was accomplished before 6 100 FC since the aeroplane first flight. Group 2 aeroplanes are those which are not Group 1 aeroplanes.

If the modification is embodied before 6 100 FC since aeroplane first flight, the aircraft cannot be Group 2 aeroplanes and It is Group 1.

The compliance time as defined in Table 1 of this AD is required.

Table 1 - Inspection Thresholds

Compliance Time	
Group 1	Before exceeding 53 900 FC since embodiment of the modification SB, as applicable

So, I think Para (2) is not on Group 2 aeroplanes, and it is an unnecessary clause.

EASA response:



Comment partially agreed.

This paragraph provides a extended compliance time for Group 2 aeroplanes that have accomplished, after the effective date of this AD, the mod SB before 6 100 FC. Meaning that the next inspection, as required by paragraph (1), can be deferred until 53 900 FC. After that, the interval of paragraph (1) is applicable.

Paragraph (2) was changed in order to better clarify its intend.

Commenter 2: Sudan Civil Aviation Authority – Mohamed Salih Yousif – 19/02/2025
Comment # 2

A. In paragraph (2), the term between parentheses contradicts with Group 2 definitions. As Group 2 aeroplane are those which are not Group 1 aeroplanes.

Group 1 aeroplanes in Definitions section: are those in which the modification SB was accomplished (before 6 100 FC since the aeroplane first flight). Clarification is required.

B. In paragraph (6), clarification is required for the term (for those holes for that aeroplane). As it may be explained by (task 531103 contains another holes that are not covered by the modification SB.

For example: after accomplishment of modification SB, task 531103-01-2 is cancelled.

If the term (for those holes) mentioned, may give indication of having another holes inspection in this task are Not cancelled.

EASA response:

A. Comment noted. See Comment 1.

B. Comment noted. “Those holes” means the modified fastener holes in accordance with the requirements in paragraph (6), where no damage or cracks were detected. It might be that some holes are modified fastener holes as described in paragraph (6), while others do not meet this condition. Paragraph (6) provides terminating action for those holes, which were modified.

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

Commenter 3: Deutsche Lufthansa AG – Ainara Ziarrusta Atutxa – 24/02/2025


Comment # 3

DLH would like to give the following comment regarding Para (5) Credit of PAD 25-031 :

DLH believes that accomplishment of inspection on an aeroplane as required by paragraphs (1) to (3) allows cancellation of ALI Tasks (regardless of corrective actions).

Please note that Corrective Actions per Para (4) is only required in case of discrepancies found during inspection and therefore should not be a requisite to cancel the ALI Task. Note that currently the sentence requires both inspection AND corrective actions.

Therefore DLH requests EASA to revise the paragraph accordingly.

EASA response:

Comment agreed. Paragraph (5) was updated accordingly in response to this comment.

Commenter 4: American Airlines – Neil Gary – 07/03/2025**Comment # 4**

References:

/A/ EASA PAD 25-031

/B/ EASA AD 2018-0289R1

In the Applicability section of Ref /A/, it states: “Aeroplanes having the modification SB, as defined in this AD, embodied after 6 100 flight cycles (FC) since aeroplane first flight” are not applicable to this new PAD. As the work scope required by this proposed AD is the same as Ref /B/, and operators want to be assured of compliance to the very latest requirements when questioned by the Regulatory bodies, AAL proposes the removal of this statement from the Applicability paragraph and adding a new paragraph in the “Terminating Action” section which would state, “Aircraft which had the modification SB embodied after 6 100 FC since aeroplane first flight and before the effective date of this AD are considered to have the repeat inspections requirements terminated for this AD.”

Adding this statement in the “Terminating Action” section reinforces the “Required Action(s) and Compliance Time(s)” statement in Ref /A/ and allows for better AD effectivity summaries for operators, allowing them to show that the aircraft have had the initial inspection and the modification completed, and that the aircraft are terminated from further inspection requirements. Revising Ref /A/ in this manner also more closely follows other AD’s that have terminating actions and are superseded.



Additionally, some operators may incorrectly consider aircraft that have previously accomplished the terminating action to be not applicable to this AD's required actions (compared to being applicable to EASA AD 2018-0289R1) and may therefore not properly show AD compliance. By including the requested statement in the "Terminating Action" section it will assure operators continue to track the actions accomplished for the superseded AD, Ref /B/.

EASA response:

Comment not agreed.

EASA is keen on limiting the applicability as much as possible to aeroplanes which are subject to the unsafe condition. As it was determined that aeroplanes having the modification SB embodied after 6 100 FC, they are not concerned of that unsafe condition, so do not need to be in the applicability of that AD.

Once this AD is effective, AD 2018-0289R1 is considered cancelled/superseded and compliance has to be shown to this AD.

No changes were made to the final AD in response to this comment.

