

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-035

[Published on 24 February 2025 and officially closed for comments on 24 March 2025]

Commenter 1: Fiji Airways – Jaisal Chand – 25/02/2025

Comment # 1

FJI would like to request if EASA can extend the compliance threshold stated in paragraph 2 of the PAD 25-035. Our A350 aircraft were all manufactured in 2019 making the compliance of the AD fall due in 2025. When we consider the potential extensive nature of the inspection SB, it is rather abrupt for us to organise, plan and schedule this SB. Findings of bush migration will warrant repairs to be performed with the aircraft in zero stress jacking configuration. This special configuration is something we do not have the capability for at our home base in Nadi, it is something that we have to push to our heavy maintenance at an MRO. For FJI to be able to perform the inspection SB and remain in compliance with the final AD, we request if EASA may consider increasing the postponement threshold to 13 months in lieu of the current 7 months.

This will help us to find the appropriate ground time with an MRO and obtain the special jacking equipment required for THS zero stress jacking.

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Table 1 – DET Threshold and Interval(s)

Group	Compliance Time (since aeroplane date of manufacture)	Interval
1	Within 6 years	6 years
2	Before exceeding 5 500 flight cycles (FC), or 22 900 flight hours (FH), or 6 years, whichever occurs first	5 500 FC, or 22 900 FH or 6 years, whichever occurs first
3	Before exceeding 15 200 FC, or 63 700 FH, or 6 years, whichever occurs first	7 200 FC, or 30 000 FH or 6 years, whichever occurs first

(2) For aeroplanes on which Airbus mod 110669 has been embodied in production, it is allowed to postpone the accomplishment of the initial inspection as required by paragraph (1) of this AD until 7 months after the effective date of this AD.



EASA response:

Comment # 1 not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter. No changes have been made to the final AD in response to this comment.

Commenter 2: Air France Industries – Samuel Kernin – 17/03/2025**Comment # 2**

We would like to share our opinion regarding paragraph (2) which introduces a "grace period" for accomplishment of the initial inspection on Airbus mod 110669 has been embodied in production. Due to industrialization issues, we would like the "grace period" in the final document to be at least equal to or greater than the one introduced in Inspection SB A350-55-P013 Rev2, which is December 4, 2025.

EASA response:

Comment #2 noted. The 7 months "grace period" indicated in (2) have been defined with the aim of requiring action at or around the Dec 4 2025 indicated in SB A350-55-P013, starting from the foreseeable AD effective date. No changes have been made to the final AD in response to this comment.

Commenter 3: Virgin Atlantic – Yosu Zalvide Perez – 17/03/2025**Comment # 3**

Virgin Atlantic (VIR) has reviewed PAD 25-035 ATA 55 – Stabilizers – Horizontal Tail Plane Lateral Load Fitting Bushings – Inspection and would like to comment on Paragraph (1) Compliance Time for Group 2 aeroplanes.

Compliance time for Initial Inspection for this group of aeroplanes (which all affected VIR A350-1041 belong to) is given as 5,500 FC / 22,900 FH / 6 YR from date of manufacture, whichever occurs first. Subsequent inspection is to be performed at 5,500 FC / 22,900 FH / 6 YR intervals thereafter, whichever occurs first.

For a standard long-haul operation that the A350-1041 is intended for, VIR believe that the 22,900 FH limit is significantly more restrictive than the FC or calendar limit. As an example, VIR standard utilisation is approximately 600 FC / 5,000 FH per calendar year, which translates into aeroplanes at 6 YR age having accrued around 30,000 FH.



From own experience and liaison with Airbus, we believe this inspection and terminating action A350-55-P012 are better suited to be carried out during a heavy maintenance input. VIR have so far inspected 4 aircraft during 6 YR check maintenance, with 3 of them having bushing migration findings of some extent. These aircraft required immediate rectification, which in turn requires shoring of the THS.

Due to the 22,900 FH limit, VIR plan is to achieve the required inspections per A350-55-P013 and terminating action per A350-55-P012 at 3 YR checks, since based on standard VIR utilisation these aircraft will not reach the 6 YR check. However, a total of 4 aircraft have already been through 3 YR check maintenance and will not reach 6 YR check maintenance, meaning that inspections and likely rectification will fall out of phase and require a dedicated heavy maintenance input to be arranged.

VIR would like to kindly request EASA to review the 22,900 FH limit for both initial and repeat inspection, in order to avoid operational disruption, and if possible align it with the 5,500 FC / 6 YR limits. VIR believes a 5,500 FC / 30,000 FH / 6 YR would align better with scheduled maintenance checks of long haul operators, but acknowledges any safety concerns that impact the definition of the FH limit.

EASA response:

Comment #3 not agreed. See reply to Comment #1

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

Commenter 4: Delta Air Lines – Kimberly Davis & Alexandra Kidd – 19/03/2025

Comment # 4

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-035, dated 24 Feb 2025

(B) EASA Airworthiness Directive: AD No. 2020-0139R1, dated 03 Jul 2020

(C) Airbus Service Bulletin (SB) SB A350-55-P013 R02, dated 04 Dec 2024

(D) Airbus Service Bulletin (SB) SB A350-55-P012, dated 15 Dec 20

(E) Airbus Technical Follow-Up (TFU) 55.16.00013, dated 13 Jan 2025

(F) Airbus Service Bulletin (SB) SB A350-55-P013, dated 18 February 2020

Comment A

Commenter Request

Delta request to not issue an AD until the revised modification Service Bulletin is published.



Request Justification

EASA PAD, Ref(A), extends the effectivity to include post mod 110669 aircraft. To accomplish the work, EASA PAD, Ref (A), references two Airbus Service Bulletins, the inspection SB, Ref (C), and the modification SB, Ref (D).

However, only the inspection SB, Ref (C), has been revised to extend the effectivity. The revised modification SB, with extended effectivity, is expected to be published by Q2/2025 as per Airbus TFU, Ref (E).

Therefore, if the EASA AD is published prior to the revised modification SB, operators cannot complete the terminating action on aircraft which embody mod 110669 as they are not yet included in the SB effectivity.

Comment BCommenter Request

Delta requests the addition of a grace period to paragraph (1) Table (1) compliance time. Table (1) be modified from (original text):

Group	Compliance Time (Since aeroplane date of manufacture)	Interval
1	Within 6 years	6 years
2	Before exceeding 5 500 flight cycles (FC) or 22 900 flight hours (FH), or 6 years, whichever occurs first	5 500 FC, or 22 900 FS or 6 years, whichever occurs first.
3	Before exceeding 15 200 FC, or 63 700 FH, or 6 years whichever occurs first	7 200 FC, or 30 000 FH or 6 years, whichever occurs first.

To state (modified text):

Group	Compliance Time (Since aeroplane date of manufacture)	Interval
1	Within 6 years	6 years
2	Before exceeding 5 500 flight cycles (FC) or 22 900 flight hours (FH), or 6 years, whichever occurs first	5 500 FC, or 22 900 FS or 6 years, whichever occurs first.
3	Before exceeding 15 200 FC, or 63 700 FH whichever occurs first OR Within 6 years of the effective date of this AD, whichever occurs later.	7 200 FC, or 30 000 FH or 6 years, whichever occurs first.

Delta also suggests concurrent removal of paragraph (2).



Request Justification

Delta requests the addition of a grace period to table (1) group 3 compliance time.

Delta has 9-year-old aircraft that were not included in the effectivity of the original release of the EASA AD. These aircraft are now subject to table (1) group 3 limits meaning that they would be due within months and therefore Delta requests a grace period. Due to the intensive technical nature of this inspection and modification, Delta would prefer to accomplish this with experienced mechanics in a hangar environment, not on the Line. The requested 6-year grace period would support that. The addition of a grace period to table (1) group 3 fulfills the same need as which described in paragraph (2) of this PAD and therefore Delta suggests concurrent removal of paragraph (2).

Delta does not have any table (1) group 2 aircraft, however the same comment could apply to group 2 aircraft.

List paragraphs that change; describe (nonobvious) changes

- Paragraph (1) Table (1)
- Paragraph (2)

Comment CCommenter Request

Delta requests the Flight Hour limit of the interval for table (1) group 3 be extended. Table (1) be modified from (original text):

Group	Compliance Time (Since aeroplane date of manufacture)	Interval
1	Within 6 years	6 years
2	Before exceeding 5 500 flight cycles (FC) or 22 900 flight hours (FH), or 6 years, whichever occurs first	5 500 FC, or 22 900 FS or 6 years, whichever occurs first.
3	Before exceeding 15 200 FC, or 63 700 FH, or 6 years whichever occurs first	7 200 FC, or 30 000 FH or 6 years, whichever occurs first.

To state (modified text):

Group	Compliance Time (Since aeroplane date of manufacture)	Interval
1	Within 6 years	6 years
2	Before exceeding 5 500 flight cycles (FC) or 22 900 flight hours (FH), or 6 years, whichever occurs first	5 500 FC, or 22 900 FS or 6 years, whichever occurs first.
3	Before exceeding 15 200 FC, or 63 700 FH whichever occurs first	7 200 FC, or 32 850 FH or 6 years, whichever occurs first.



Request Justification

Operators with high utilization aircraft, some collecting 15 hours per day, would not reach heavy check within the specified interval of 30 000 FH, table (1) group (3). For Delta, 30 000 FH would be reached in 5.5 years not 6 years, and therefore would not reach heavy check. As stated before this inspection and modification needs to be done by experienced mechanics in a hangar environment, not on the Line.

This needs to be completed with a highly specialized crew on a hangar visit. There would be risks exposed if this was accomplished on the Line. Therefore, Delta requests the flight hour limit of the interval for group 3 aircraft be extended to accommodate our utilization.

List paragraphs that change; describe (nonobvious) changes

- Paragraph (1) Table (1)

Comment DCommenter Request

DAL requests clarification of the interval and the addition of a grace period to paragraph (4).

Request Justification

Paragraph 4 of the PAD states that the previously accepted replacement of all 4 bushings is no longer considered terminating action. Delta could have accomplished the replacement of all 4 bushings 5.5 years ago. The question Delta now asks is what interval applies, as the previously considered terminating action is no longer considered terminating action anymore.

Delta requests clarification on what the interval in Paragraph (4) is. Delta also requests a grace period of 6 years to allow this to be completed in a hangar visit at heavy check.

List paragraphs that change; describe (nonobvious) changes

- Paragraph (4)

EASA response:

Comment # 4A not agreed. Accomplishment of the MSB is an optional terminating action to the inspection mandated by this AD and the risk assessment does not support an extension of the compliance time as requested by the commenter. Airbus is expected to revise SB A350-55-P012 to amend its applicability.

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

Comment # 4B not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.

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

Comment # 4C not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.

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



Comment # 4D partly agreed. The final AD has been amended stating that the Compliance Time starts also from ISB repair embodiment date. The risk assessment though does not support an extension of the compliance time as requested by the commenter.

Commenter 5: Cathay Pacific – Kathy Chin – 21/03/2025

Comment # 5

In Para(1), it mentions that operator needs to carry out SB 55-P013 within the compliance time stated in Table 1. Since many aircraft are excluded from the applicability of previous AD, it is foreseeable that those newly applicable aircraft will meet the compliance due date or even exceed the compliance table required timeframe once AD issued. For example, in CPA fleet, one aircraft will have less than 3 months to prepare the inspection. Hence, CPA would like to ask if EASA will extend the compliance time to 9 years and equivalent FH/FC for those newly added aircraft so that operator can perform SB 55-P013 in next available c check.

EASA response:

Comment # 5 not agreed. See reply to Comment #1.

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

Commenter 6: Deutsche Lufthansa AG – Thorsten Koch – 24/03/2025

Comment # 6

1. Applicability:

Problem: To our best knowledge, MOD 114806 is a retrofit modification only, refer to SB A350-55-P012. At present, there is apparently no A350 aircraft in the world fleet which would have been modified in production. In fact, the inspection requirement affects all aircraft in service, and all those still to be delivered until the embodiment of a linefit solution. MOD 114806 (SB 55-P012) is the terminating action to the inspection requirements per the proposed AD. Embodiment of subject MSB cancels the inspection requirements (terminating action), but it is always possible that, in a future SB revision or future AD, new/additional requirements may have to be defined also for aircraft with subject MSB (or a certain revision of the MSB) already embodied. Consequently, the exclusion of POST MOD 114806 aircraft from the AD applicability seems not correct.



Solution: The most accurate applicability description seems rather be “Airbus A350-941 and A350-1041 aeroplanes, all manufacturer serial numbers”.

2. Applicability/ AD group 1

- A. Problem: With revision R02 of ISB 55-P013, Airbus has extended the applicability of SB Config 1 (AD Group 1) from PRE 110669 to [PRE 110669] OR [POST 110669 PRE 114615]. Basically, aircraft in [POST 110669 PRE 114615] have just been added to that group. Aircraft in [POST 110669 PRE 114615] are a quite large population of the world fleet. It should be noted that MOD 110669 has introduced interference fit on HTP lateral load fitting bushings to improve the resistance against rotation/migration of bushes and subsequent corrosion/fatigue damage. While it is well understood that this modification is less effective than initially considered, the proposed AD grace period of only 7 months from AD effective date (refer to PAD paragraph (2)) seems very conservative given the fact that the interference fit would not solve but improve the situation.

To explain that further: The retainers introduced with MSB 55-P012 will effectively prevent bush migration, which deletes the concern of loss in bearing area and the related fatigue damage risk. But it does not prevent bush rotation/sealant cracking and resulting corrosion due to moisture ingress. However, for Group 1, the F&DT analysis has not identified a FD concern (has only a corrosion driven calendar time threshold and interval, as opposed to groups 2 and 3). Consequently, if corrosion due to rotation is the only concern for this group, why should a POST 110669 with higher interference fit bush installation have to be treated more restrictive than PRE110669 - while at the same time aircraft with MOD 114806 (SB 55-P012) installed (which does not prevent rotation) and lower fit (PRE110669) has no inspection requirement at all?

The short grace period may force operators to perform the initial inspections in a tight schedule in line maintenance conditions. Airbus recommends embodying the MSB 55-P012 at the opportunity of the initial inspection – this may be very difficult from a perspective of material/tooling availability and aircraft downtime to perform the modification within the tight schedule.

Solution: The net safety improvement in the fleet could potentially be higher if a more relaxed grace period would be granted, allowing embodiment the modification / terminating action at the earliest opportunity. The improved protection against bush rotation introduced with MOD 110669 should be considered when determining the AD threshold and/or grace period (should be generally better than PRE 110669).

- B. Problem: SB Config 1 (AD Group 1) also includes airplanes [POST 110669 PRE 114615 POST 114314]. A relevant portion of that subfleet may already have passed the 6YRS heavy maintenance check, but the MRBR 551000-00S13-02 may not have been accomplished on all of these aircraft, since its threshold is at 144 MTH (due to POST 114314). However, some operators may have decided, based on in-service information from Airbus, to preventively perform the MRBR CPCP inspection already at 72 MTH (since ISB 55-P013 R02 was not yet published at that time) for such airplanes. However, PAD paragraph (7) deprives them from the credit to be taken from the MRBR inspection, so only the very restrictive AD grace period of 7 months applies (as discussed above). Technically, this is not reasonable since the structural condition of the lateral load fittings is the same as for PRE 114314.

Solution: Delete PRE 114314 restriction from PAD paragraph (7) as follows: “For aeroplane on which Airbus mod 110669 has been embodied in production: Inspections of the affected parts, accomplished on an aeroplane in accordance with the instructions of the Airbus Maintenance



Review Board Report (MRBR) task 551000–00013 are acceptable to comply with the initial inspection requirement of paragraph (1) of this AD for that aeroplane.

3. Applicability/ AD groups 2 and 3: Similar discussions as for group 1 apply. For example, Group 3 applies to airplanes in POST 114165 configuration. Since the point of embodiment (POE) of MOD 114314 was before POE of MOD 114165, i.e. all aircraft in this group are POST 114314, which deprives them from the option to take benefit from PAD paragraph (7). See above.

Please notice that DLH is in exchange with Airbus engineering on more details regarding the topic. These are not necessarily relevant for the PAD (and are therefore not commented here), but the ISB 55-P013R02 is not fully consistent with the PAD requirements (while the PAD is more correct than the SB); the Airbus Continued Airworthiness team may refer to Techrequest Dossier 81530822 for further information.

EASA response:

Comment # 6.1 not agreed. Airbus confirmed the existence of aircraft having embodied mod 114806 in production.

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

Comment # 6.2.A not agreed. See reply to Comment #1

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

Comment # 6.2.B agreed. The final AD has been amended as suggested by the Commenter. Airbus has confirmed being in the process of revising Airbus SB A350-55-P013 to reflect this change.

Comment # 6.3 agreed. See reply to Comment #6.2.B

