

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-056

[Published on 27 March 2025 and officially closed for comments on 24 April 2025]

**Commenter 1: TAP Air Portugal – Rodrigo Catarino – 16/04/2025**

### Comment # 1

With regard to EASA PAD No. 25-056, for "lavatories 1," we request clarification regarding the "Aeroplane Age" and the defined "Compliance Time" for the following item:

**AEROPLANE AGE:** Between 2 and 6 years

#### **COMPLIANCE TIME:**

A. Within 6 months after the effective date of this AD

B. Within 24 months since first installation of that floor fitting

C. Within 24 months since last accomplishment of the AMM task on that floor fitting, if the AMM task has been accomplished before 6 years from aeroplane date of entry into service;

Whichever occurs later.

Based on these references, please consider the following examples for the scenario where the "effective date of the AD" is 15th May 2025:

#### **a) Aircraft with approximately 5 years since EIS:**

- The AMM Task 25-40-00-210-804 (OMP task 254000-03-1) (72M Event) was accomplished on 15th March 2025.
- The due date to comply with the AD requirements would be 15th March 2027.

**Note:** The 24-month period starts from the last accomplishment of the AMM task for the lavatory floor fittings, as the task was accomplished before 6 years from the date of EIS.

#### **b) Aircraft with approximately 5 years since EIS:**

- The AMM Task 25-40-00-210-804 (OMP task 254000-03-1) (72M Event) is scheduled for accomplishment on 15th December 2025.
- The due date to comply with the AD requirements would be 15th October 2025.

**Note:** This complies with "within 6 months after the effective date of the AD."



This means that for aircraft that have not performed the AMM task before 15th May 2025 (the newest aircraft), we cannot consider the 24-month threshold in a way that would allow us to accommodate the accomplishment of the AD (SB/AMM) during the upcoming C-Checks, in addition to the 6-year threshold of the TAP fleet.

On the other hand, some of our older aircraft have already accomplished or will accomplish the AMM task before 15th May 2025. For these, we can benefit from the 24-month threshold and schedule the accomplishment of the AD during the next C-Check.

Could you please confirm if the following interpretation is correct:

Where it says:

"...if the AMM task has been accomplished before 6 years from the date of EIS..."

Should we understand it as:

"...if the AMM task is accomplished before 6 years from the date of EIS..."

If yes, we will consider the 24-month threshold for all aircraft that will complete the AMM task before 6 years from the date of EIS.

***EASA response:***

***Comment agreed; Final AD has been updated accordingly.***

***Commenter 2: Cebu Air, Inc. – Joel Q. Biag Jr. – 23/04/2025***

**Comment # 2**

We've reviewed PAD 25-056 and would like to inform you of a point regarding the differences in compliance thresholds between those specified in the Service Bulletin (SB) and the Airworthiness Directive (AD).

Upon comparison, we observed that some of the SB thresholds are more restrictive than those in the AD, assuming the AD becomes effective on 15 May 2025. This difference appears to stem from the baseline used for compliance calculations — the SB references the Entry Into Service (EIS) / First Flight date, while the AD uses the Date of Manufacture (DOM).

For your reference, we've attached a table summarizing the due dates and our manual computation based on the AD threshold.

Please also note:

- Aircraft highlighted in **green** have already completed compliance or are scheduled for compliance by tomorrow.
- Aircraft highlighted in **yellow** reflect the more restrictive thresholds when comparing the SB and AD.



A/C	AD - MID Lavs	SB - MID Lavs	A/C	AD - AFT Lavs	SB - AFT Lavs
3900	15-Nov-2025	17-Jul-2025	3900	15-Nov-2025	17-Jul-2025
3901	15-Nov-2025	17-Jul-2025	3901	15-Nov-2025	17-Jul-2025
3902	15-Nov-2025	Complied	3902	15-Nov-2025	Complied
3903	15-Nov-2025	10-Nov-2025	3903	15-Nov-2025	17-Jul-2025
3904	16-Nov-2026	21-Nov-2026	3904	16-Nov-2025	16-Nov-2025
3905	28-Feb-2027	04-May-2027	3905	28-Feb-2026	01-Mar-2026
3906	28-Apr-2026	Scheduled LTP	3906	15-Nov-2025	Scheduled LTP
3907	14-Dec-2026	19-Dec-2026	3907	14-Dec-2025	15-Dec-2025
3908	24-Jul-2027	25-Jul-2027	3908	24-Jul-2026	26-Jul-2026
3909	13-Dec-2027	19-Dec-2027	3909	13-Dec-2026	19-Dec-2026
3910	14-Mar-2028	28-Mar-2028	3910	14-Mar-2027	28-Mar-2027



A/C	MSN	DOM	Year	Year, Month, Day (23-April-2025)	AD Effective date (Assumption)	SAFRAN D/E (L75/L72)		Less than 2 years			Between 2 and 6 years			Less than 2 Years	Between 2 and 6 years	Due Date
						Less than 2 years	Between 2 and 6 years	A	B	C	A	B	C	Occurs Later	Occurs Later	
3900	2001	25-Nov-2021	3	3 years, 4 months, 29 days	15-May-2025		\				15-Nov-2025	25-Nov-2023	25-Nov-2023		15-Nov-2025	15-Nov-2025
3901	2002	15-Dec-2021	3	3 years, 4 months, 8 days	15-May-2025		\				15-Nov-2025	15-Dec-2023	15-Dec-2023		15-Nov-2025	15-Nov-2025
3902	2004	18-May-2022	2	2 years, 11 months, 5 days	15-May-2025		\				15-Nov-2025	18-May-2024	18-May-2024		15-Nov-2025	15-Nov-2025
3903	1970	03-Nov-2022	2	2 years, 5 months, 20 days	15-May-2025		\				15-Nov-2025	03-Nov-2024	03-Nov-2024		15-Nov-2025	15-Nov-2025
3904	1973	16-Nov-2023	1	1 years, 5 months, 7 days	15-May-2025	\		16-Nov-2025	15-Nov-2025	16-Nov-2025				16-Nov-2025		16-Nov-2025
3905	1976	29-Feb-2024	1	1 years, 1 months, 25 days	15-May-2025	\		28-Feb-2026	15-Nov-2025	28-Feb-2026				28-Feb-2026		28-Feb-2026
3906	1967	28-Apr-2023	1	1 years, 11 months, 26 days	15-May-2025	\		28-Apr-2025	15-Nov-2025	28-Apr-2025				15-Nov-2025		15-Nov-2025
3907	2054	14-Dec-2023	1	1 years, 4 months, 9 days	15-May-2025	\		14-Dec-2025	15-Nov-2025	14-Dec-2025				14-Dec-2025		14-Dec-2025
3908	2068	24-Jul-2024	0	0 years, 8 months, 30 days	15-May-2025	\		24-Jul-2026	15-Nov-2025	24-Jul-2026				24-Jul-2026		24-Jul-2026
3909	2074	13-Dec-2024	0	0 years, 4 months, 10 days	15-May-2025	\		13-Dec-2026	15-Nov-2025	13-Dec-2026				13-Dec-2026		13-Dec-2026
3910	2087	14-Mar-2025	0	0 years, 1 months, 9 days	15-May-2025	\		14-Mar-2027	15-Nov-2025	14-Mar-2027				14-Mar-2027		14-Mar-2027

A/C	MSN	DOM	Year	Year, Month, Day (23-April-2025)	AD Effective date (Assumption)	SAFRAN L/M, S/T and Hs/Ks		Less than 3 years			Between 3 and 6 years			Less than 3 Years	Between 3 and 6 years	Due Date
						Less than 3 years	Between 3 and 6 years	A	B	C	A	B	C	Occurs Later	Occurs Later	
3900	2001	25-Nov-2021	3	3 years, 4 months, 29 days	15-May-2025		\				15-Nov-2025	25-Nov-2024	25-Nov-2024		15-Nov-2025	15-Nov-2025
3901	2002	15-Dec-2021	3	3 years, 4 months, 8 days	15-May-2025		\				15-Nov-2025	15-Dec-2024	15-Dec-2024		15-Nov-2025	15-Nov-2025
3902	2004	18-May-2022	2	2 years, 11 months, 5 days	15-May-2025	\		18-May-2025	15-Nov-2025	18-May-2025				15-Nov-2025		15-Nov-2025
3903	1970	03-Nov-2022	2	2 years, 5 months, 20 days	15-May-2025	\		03-Nov-2025	15-Nov-2025	03-Nov-2025				15-Nov-2025		15-Nov-2025
3904	1973	16-Nov-2023	1	1 years, 5 months, 7 days	15-May-2025	\		16-Nov-2026	15-Nov-2025	16-Nov-2026				16-Nov-2026		16-Nov-2026
3905	1976	29-Feb-2024	1	1 years, 1 months, 25 days	15-May-2025	\		28-Feb-2027	15-Nov-2025	28-Feb-2027				28-Feb-2027		28-Feb-2027
3906	1967	28-Apr-2023	1	1 years, 11 months, 26 days	15-May-2025	\		28-Apr-2026	15-Nov-2025	28-Apr-2026				28-Apr-2026		28-Apr-2026
3907	2054	14-Dec-2023	1	1 years, 4 months, 9 days	15-May-2025	\		14-Dec-2026	15-Nov-2025	14-Dec-2026				14-Dec-2026		14-Dec-2026
3908	2068	24-Jul-2024	0	0 years, 8 months, 30 days	15-May-2025	\		24-Jul-2027	15-Nov-2025	24-Jul-2027				24-Jul-2027		24-Jul-2027
3909	2074	13-Dec-2024	0	0 years, 4 months, 10 days	15-May-2025	\		13-Dec-2027	15-Nov-2025	13-Dec-2027				13-Dec-2027		13-Dec-2027
3910	2087	14-Mar-2025	0	0 years, 1 months, 9 days	15-May-2025	\		14-Mar-2028	15-Nov-2025	14-Mar-2028				14-Mar-2028		14-Mar-2028



**EASA response:**

*Comment noted. EASA is aware that, in some cases, the compliance time (CT) of the AD might be less stringent than the CT recommended in the SB referenced by the AD (e.g., when the CT is based on the AD effective date versus the SB date of issuance). This is not the case when the CT is calculated on the a/c date of manufacture (AD) vs the date of entry into service (SB), as the date of manufacture always occurs before the date of entry into service.*

*The differences above are taken into consideration while drafting the (P)AD.*

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

