

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-061R1

[Published on 11 August 2025 and officially closed for comments on 08 September 2025]

Commenter 1: Cathay Pacific Airways Limited – Dana Medallon – 15/08/2025

Comment #1

First of all, I am writing to seek further clarification regarding the definition of Group 2 aircraft. Specifically, I would like to know if these aircraft are defined as successfully analyzed by Airbus and has been concluded that their AOA angles were all within the specified limits.

Additionally, I would also like to seek clarification regarding the difference of the compliance time of reporting of the AOA classification to Airbus as defined by Airbus AOT A34L00-24 Rev. 01 and EASA PAD 25-061 Rev. 01 with the following details as follows:

- Airbus AOT A34L009-24 Rev. 01 compliance time:

Airbus requires the operators to perform the procedure given in paragraph 5.5 at the earliest opportunity but no later than 9 months from the effectivity date of the Rev 00 of this AOT (17th April 2025), leading to a deadline of January 17, 2026.

- EASA PAD 25-061R1 compliance time:

Within 3 months after the effective date of AD (Note: AD is yet to be issued)

Could you please advise if the EASA AD will be aligned with the timeline specified in AOT A34L009-24 Rev. 01? If not, could you kindly provide the target date for the release of the EASA AD?

Lastly, our understanding to the is for operators to: 1.) identify whether the aircraft is affected and its AOA Group classification and 2.) to contact Airbus for affected aircraft (Group B or/and Group C) for repair instruction within three months from the AD effectivity date.

EASA response:

Comment agreed: The compliance time in the AD is consistent with the AOT instructions.



Commenter 2: World2Fly – Carlos Rey – 12/08/2025**Comment #2**

I am writing to request clarification regarding the PAD 25-061R1, specifically paragraphs 2.2 and 5.2. These paragraphs require implementation of MMEL item 34-11-01 before next flight, and until the Airbus repair instructions (referenced in paragraphs 2.1 and 5.1) are accomplished.

However, paragraphs 2.1 and 5.1 allow contacting Airbus for approved repair instructions and completing them within the compliance time specified therein, which may be up to 36 months.

In contrast, the AOT clearly states that for Group C cases (AOA with positive bias $> +0.7^\circ$), the backplate rework must be performed before the MMEL item expiry date, implying a much shorter timeframe than the 36 months mentioned elsewhere in the PAD.

This discrepancy raises the following question:

Q: Should the backplate rework for Group C AOAs be completed before MMEL expiry, as per the AOT, or is the 36-month window in the PAD applicable?

EASA response:

Comment agreed. Final; AD has been updated accordingly.

Commenter 3: Elbe Flugzeugwerke GmbH – Ulf Meinhardt – 28/08/2025**Comment #3**

EFW as the STC holder for the A330 Passenger to Freighter Conversion (P2F) STC No. 10063798 would like to comment the new revision on the AD Proposal 25-061R1 as follows:

As commented for the initial revision of the PAD, EFW kindly requests to limit the upcoming AD to all MSNs which are not converted to freighters in accordance with the EFW STC No. 10063798.

In the latest revision of the PAD all already converted MSN have been excluded from the effectivity (see Group 1), but for all upcoming conversion MSN it is still required to comply with the AD.

As mentioned before, EFW has issued new design data (minor change approval number DOA/2024/057) to address the issue also for aircraft currently in conversion and also for future conversions.

As a consequence, the problem will not exist on all P2F converted aircraft.



EASA response:

Comment not agreed. Group 2 aeroplanes remain affected by the AD in order to prohibit accomplishment of “any affected task, modification or repair” in the future. No changes have been made to the Final AD in response to this comment.

Commenter 4: Turkish Airlines – Belinay Aksoy – 08/09/2025
Comment #4

Thank you for considering our previous comments in the PAD 25-061 and for providing additional methods to address the issue. We also would like to provide feedback regarding the new revision of the PAD 25-061 and related procedures:

- A) In case of an AOG, Airbus response time should be clearly defined and guaranteed, and corrective action details, including estimated man-hours (M/H), should also be incorporated directly into the AD. Furthermore, as the issue described in the AD originates from Airbus, the document should contain a reimbursement clause covering AOG and maintenance costs.
- B) In addition, the term “Stabilized Flight Conditions” should be more clearly defined in the AD. The relevant QAR parameters (e.g., airspeed, vertical speed) to be used for verification should also be specified. Finally, the AOT could be improved with more detailed step-by-step instructions, or alternatively, these steps may be defined in a separate SIL for clarity. Since MCDU procedures are performed in-flight, this fact should be explicitly highlighted. Initially, we assumed the method would be applicable on the maintenance side, which complicates the AD implementation. This point should be clearly communicated to operators.

EASA response:

Comment 4A: Comment not agreed. According to Regulation (EU) 748/2012, Part 21, maintenance cost, man-hours and reimbursement are not regulated by AD. No changes have been made to the Final AD in response to this comment.

Comment 4B: Comment not agreed. The AD refers to the AOT (and documents references herein) for the detailed instructions. Airbus has been informed for possible update of the AOT; later revision of the AOT will be acceptable for compliance with the AD requirements. No changes have been made to the Final AD in response to this comment.

