

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-076

[Published on 21 May 2025 and officially closed for comments on 18 June 2025]

Commenter 1: Delta Air Lines, Inc. – Brian Duff & Michael D. Tharp – 12/06/2025

Comment #1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-076, dated 21 May 25

(B) Airbus Alert Operator Transmission (AOT) A35P024-24, dated 22 April 25

(C) EASA AD No.: 2024-0186, dated 24 Sept 24

Comment A

Commenter Request

Add a new Definition to the Definitions section of Ref (A):

“Corrected MP task: Maintenance Procedure (MP) Task A350-A-35-21-36-A0001-720A-A dated October 2024, or later.”

Request justification

The new “Corrected MP task” definition will be used to accurately simplify the paragraph (1) instructions, as discussed in Comment 3 of this letter.

List paragraphs that change; describe (nonobvious) changes

Definitions:

New Definition for “Corrected MP task” to clearly define the installation process required when replacing “Affected parts”.

Comment B

Commenter Request

Revise the “Affected part” Definition in the Definitions section of Ref (A):

The new definition would read...



“Affected part: Chemical oxygen generator fitted in a container having Part Number (P/N) and Amendment designation as listed in Table 1 of the AOT, as defined in this AD, and which has been replaced in service in accordance with the MP task, as defined in this AD, between November 2023 and the effective date of this AD.

Aircraft maintenance records can be used to identify Affected parts.”

Request justification

The new “Affected part” definition will include the statement that aircraft maintenance records can be used to identify Affected parts.

Adding this statement to the Affected parts definition directly gives the operator the ability to use aircraft records without relying on all the complexities of the AOT, ref (B) of this letter, for this allowance.

List paragraphs that change; describe (nonobvious) changes

Definitions:

New Definition for “Corrected MP task” to clearly define the installation process required when replacing “Affected parts”.

Comment C

Commenter Request

Replace the ref (A) “Part(s) Replacement paragraph (1)” as follows:

For Group 1 aeroplanes: Within 6 months after the effective date of this AD replace each affected part with a serviceable part using the Corrected MP task, as defined by this AD, for the installation process.

Request justification

Use of the Corrected MP task for the installation process of a Serviceable part when replacing an Affected Part eliminates the safety concern driving the AD while simplifying the compliance path for the operator. Referring to the AOT, ref (B) of this letter, as a source of instructions adds unnecessary complexity to the part installation process without adding a safety benefit. Use of the Corrected MP task is all the instructions needed to remove the safety issue. Refer to ref (C) EASA AD paragraph (3) as an example of how this compliance concept has been approved in previous ADs.

List paragraphs that change; describe (nonobvious) changes

Part(s) Replacement paragraph (1)

EASA response:

Comment #1.A not agreed. See answer to Comment 1.C.



Comment #1.B partially agreed. A note has been added to provide the requested clarification. It has to be noted that the Airbus' AOT the AD refers to already specifically mentions the possibility of using maintenance records to determine if a part meets the "affected part" definition or not. Additionally, any method is acceptable to make this determination, provided it is acceptable to the NAA enforcing the AD.

Comment #1.C not agreed. If agreed, the MP task would become a task mandated by an AD, and any revision of that AMM task would then need to be agreed by EASA. While a similar approach (requiring quality procedures) is agreed when an AD refers to a SB (or similar documents), and therefore later revision of that SB are acceptable for compliance with the AD, similar procedures are not yet applicable for AMM tasks. For this reason, an EASA AD can accept using an AMM task to accomplish certain actions, but usually does not mandate using that AMM task.

To be noted that the AD requires a one-time action for parts replacements, and that the instructions of the AOT, which are required for compliance with the AD, are exactly the "corrected AMM tasks" mentioned in the comment.

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

