

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-077

[Published on 26 May 2025 and officially closed for comments on 16 May 2025]

Commenter 1: Deutsche Lufthansa AG – Oliver Bender – 28/05/2025

Comment #1

- A. Why are the terminating documents VSB 005-25-39 and VSB 005-25-40 not listed under “Ref. Publications”?
- B. For what reason are the terminating documents VSB 005-25-39 and VSB 005-25-40 not described as terminating actions? But only via the detour of the airplane SB?

However, these VSBs (-39/-40) are often / mostly shown on the component documents (Form1, etc.). A naming in the PAD/AD would represent an improved compliance representation.

EASA response:

Comment noted.

A: These VSBs are not listed and mentioned in the AD, as those are part of the SB mentioned in the AD. This avoids to list several VSBs / SBs / AOTs, while they are used to together.

B: See answer to comment A.

No change has been made to the final AD in response to this comment.

Commenter 2: AEM Limited – Chris Morris – 28/05/2025

Comment #2

I have performed a routine check of any airworthiness directives (AD) and discovered the enclosed document. Upon reading this proposed airworthiness directive (PAD) and sharing it with the team that look after products (ATA 25 – Equipment/Furnishings – Escape Slide Inflation Reservoir Regulator Valve – Inspection/Modification).



I have some questions that you might be able to help me answer. When the team has been looking into whether this is a relevant airworthiness directive for us, it has been very difficult to understand. This is due to capability being associated to part numbers on the finished part and not necessarily on the piece part or item referred to as “Orifice Fitting (Part No. M3SP-303-004-E)”.

- A. It is unclear as to what the orifice fitting (Part No. M3SP-303-004-E) is, and where it is located?
- B. If it is on the slide/raft – what is the CMM number for this?
- C. If it is on the slide/raft – what is the part number for the raft?
- D. If it is on the reservoir regulator valve – what is the CMM number for this?
- E. If it is on the reservoir regulator valve – what is the part number for this?

EASA response:

Comment noted.

A: The orifice fittings addressed in the AD are those installed on a reservoir, as defined in this AD. Those are offwing and escape slide inflation reservoirs, so are specific parts of a slide installed on an aeroplane. The AOT provides the detailed location.

B: The reservoir is independent of the slide/raft packing. Therefore there is no specific CMM number for this.

C: See answer to comment A and B.

D: See answer to comment B

E: See the definition that have been updated in the PAD

The definition section was adapted in the final AD in response to this comment.

Commenter 3: HK Express – Jimmy Ng – 29/05/2025

Comment #3

During reviewing PAD 25-077, we would like to clarify on the applicability on aircraft.

According to PAD stated the definitions:

Group 1a aircraft is referred to AOT A25N024-22, VSB 00525-37 or VSB 005-25-38 for the P/N and S/N applicability.

Group 1b aircraft is referred to AOT A25N027-23 R01, VSB 005-25-45 R01 or VSB 005-25-46 R01 for the P/N and S/N applicability.

Group 2 aircraft is referred to not installed affected part on aircraft.



SB A320-25-1CJM is applicable to MSNs: 11184, 11294, 11578, 11684, 11768, 11795, 11915, 11946, and 11992.

But above mentioned MSNs aircraft are not installed listed affected S/N in AOTs and VSBs

- A. May I understand that if above mentioned MSNs aircraft should belong to Group 2?
- B. As the above mentioned aircraft are included in SB A320-25-1CJM but do not have the AOTs and VSBs with the affected S/Ns installed.
Are there any safety concerns for those VSBs that are not applicable but involve SB-applicable aircraft?
- C. Is it possible to extend the grace period for the modification, considering the uncertainty regarding the lead time for the post-modification reservoir?

EASA response:

Comment noted.

A: Group definition has been updated. Your MSN belongs to Group1.

B: See answer to comment A.

C: For compliance time extension, please see the FAQ on the EASA website under this [link](#).

No change has been made to the final AD in response to this comment.

Commenter 4: British Airways – Awab Elniel – 11/06/2025

Comment #4

- A. Under paragraph "Definitions" the revision required for compliance is not stated for AOT A25N024-22, VSB 005-25-37, VSB 005-25-38 and SB A320-25-1CJM, yet it is stated for the remaining technical documents listed.
- B. Under paragraph "Definitions" the revision required for compliance for VSB 005-25-37 and VSB 005-25-38 is 01, yet the latest revision is 02. Revision 01 and 02 is referenced in paragraph "Ref. Publications" but this adds confusion as there is no clear instruction to use revision 02 in the PAD.
- C. Suggestion for clarity: remove revision numbers for technical documents listed under paragraph "Definitions" but retain them in paragraph "Ref. Publications" with the statement "The use of later approved revisions of the above-mentioned documents is acceptable for compliance with the requirements of this AD".

EASA response:



Comment noted.

A: If there is no reference to the Revision, this means that any revision of that document is acceptable for the compliance to this AD.

B: The revision stated in the definition, is the minimum revision of that document required by this AD for compliance. Please note, that only later revisions of those documents can be used, which are listed above the following statement in the Ref. Publications section: "The use of later approved revisions of the above-mentioned documents is acceptable for compliance with the requirements of this AD."

C: Comment not agreed. The minimum revision required for compliance will be stated in the Definition of that document or in the Required Action(s) and Compliance Time(s), as applicable.

No change has been made to the final AD in response to this comment.

Commenter 5: United Airlines – Oscar Fernandez – 16/06/2025

Comment #5

- A. The work scope detailed in EASA PAD 25-077 dated 5/26/25, Airbus SB A320-25-1CJM Rev. 00 dated 12/10/24, Safran VSB A321 005-25-39 dated 11/15/24 & Safran VSB A321 005-25-40 dated 11/15/24 is feasible.
- B. The proposed 36 months compliance time after the Effective Date of the AD is sufficient for compliance.
- C. Safran VSB A321 005-25-40 dated 11/15/2024 does not list specific Serial Number effectivity. Please provide confirmation the Service Bulletin is effective against all S/Ns for P/Ns 70200-101 through P/N 70200-104.

EASA response:

A: Comment noted.

B: Comment noted.

C: It is confirmed that the VSB applies to all SN of PN as listed in appendix 1 of the AD.

No change has been made to the final AD in response to this comment.

Commenter 6: LATAM Airlines – Cristina Gómez – 16/06/2025



Comment #6

In accordance with PAD 25-077, Group 1a is defined as "aeroplanes on which an affected reservoir is installed." The PAD also defines an affected reservoir as "any reservoir with a Part Number (P/N) listed in Appendix 1 of this AD and a serial number (S/N) as specified in VSB1 (005-25-37 or VSB 005-25-38)."

However, the applicability of Airbus Service Bulletin SB 25-1CJM and Safran VSB 005-25-39 and 005-25-40 (reference documents for compliance with Paragraph (7) of this PAD) is not limited by serial number as indicated in VSB1. Therefore, there are more units affected than those required by Group 1a.

Could you please clarify if the mandatory modification applies only to the units identified in Appendix 1 and VSB1, or if it must also include all units covered by Airbus SB 25-1CJM and Safran VSB 005-25-39 and 005-25-40?

EASA response:

Comment noted.

The Definitions in the AD have been amended. Accordingly the requirements applies now to all affected reservoirs (Group 1 aeroplanes).

