

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-078R1

[Published on 03 June 2025 and officially closed for comments on 10 June 2025]

Commenter 1: Deer Jet Co., Ltd. – Song Shen – 04/06/2025

Comment # 1

For PAD25-078R1, we have noticed that AFM Amendment requirement only involves A318 aeroplanes.

Would you please confirm if you have any AFM Amendment requirement for A319 aeroplanes?

EASA response:

Comment agreed. There is no AFM Amendment requirement for A319 aeroplanes.

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

Commenter 2: AMAC Aerospace Switzerland AG – Miggel Gehriger – 04/06/2025

Comment # 2

The mentioned PAD documentation update for the CCOM was issued by Airbus on the 9 September 2024 and provided via the Airbus world to the operators for update and Crew training.

From our side, we have not been able to identify any airworthiness issue, as the issue is not technical but rather operational. The Action is taken by the crew following a technical or operational problem with the aircraft which, if successful, would require a ditching with a probability of 1 in 10 million.

EASA response:

Comment noted. Please see the answer to Comment 1 to PAD 25-078.

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



Commenter 3: Delta Air Lines, Inc. – Rozana Chamberlain & Michael D. Tharp – 09/06/2025

Comment # 3

Reference:

(A) EASA PAD No.: 25-078R1, Issue Date 03 June 2025.

(B) Airbus A320 family Cabin Aspects of Special Emphasis (CASE) ref SA01RP1804598, issue 07, dated 18 October 2024.

(C) Airbus A320 family Difference Requirement Tables and Cabin Aspects of Special Emphasis ref. SA01RP1800465, issue 12, dated 18 October 2024.

Comment A

Commenter Request

Modify Ref (A) PAD, first paragraph in Reason for correct JAR 25.807 reference

Request justification

JAR 25.807(d)(2) does not exist, please provide proper JAR reference.

List paragraphs that change; describe (nonobvious) changes

Revise first paragraph in Reason to reference JAR 25.807(d), and not 25.807 (d)(2)

Comment B

Commenter Request

Modify Ref (A) PAD, to provide clarity to Reason paragraph 4 for associated actions

Request justification

Fourth Paragraph in Reason states:

For the reasons described above, this AD requires amendment of the AFM by incorporating the AFM update, implementation of the CIL and amendment of the cabin crew training programme by including the CCD.

Please provide clarity that the CCD is only for cabin training programme and not for AFM nor CIL.

List paragraphs that change; describe (nonobvious) changes

4th paragraph in Reason, consider replacing with



This AD requires amendment of the AFM by incorporating the AFM update, implementation of the CIL and using the CCD to amend the cabin crew training programme.

Comment C

Commenter Request

Modify Ref (A) PAD, Required Action(s) and Compliance Time(s) paragraph (6)

Request justification

Paragraph (6) states:

Amending the operator cabin crew training programmes by incorporating a later Airbus CCD revision, which includes the same content as in the CCD, is an acceptable method to comply with the requirements of paragraph (5) of this AD for that aeroplane.

Please update provision to allow incorporation of existing CCD items given in Refs (B) and (C) as well as later revisions as an acceptable method to comply with requirements of paragraph (5).

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s) Paragraph (6):

Add provision to allow existing revision of CCD as compliance

EASA response:

Comment A:

Comment agreed. The cert basis for the A319 and A318 is, respectively, JAR25Ch 11 and JAR25Ch 14. Within JAR25Ch 11 the 25.807(d)(2) exists indeed and it is moved to paragraph (e)(2) in the Ch 14, leaving the content as-is.

The reason paragraph was updated accordingly to clarify.

Comment B:

Comment not agreed. The AD wording in the reason and the required action(s) and compliance time(s) is considered clear.

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

Comment C:



Comment not agreed. FCD, here indicated as Ref C is an OSD constituent not impacted by this AD.

Concerning ref B, this is intended as part of the CCD already, as per the definition given in the (P)AD. "CCD constituted of CASE issue 6 and DR table issue 12" and as indicated in Ref publication as well. Those revisions and later approved revisions are acceptable for compliance with the requirements of this AD.

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

