

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-080

[Published on 28 May 2025 and officially closed for comments on 25 June 2025]

**Commenter 1: Eastern Airlines Technic Co.,Ltd. – Liu Wei – 29/05/2025**

### Comment #1

In EASA PAD 25-080, Required Action(s) and Compliance Time(s): Additional Work 2:(4), What does "the second additional work" refer to?  
Such a description is difficult to understand. Could it be explained more clearly?  
Or could it be written as "the additional work" as in Additional Work 1?

### **EASA response:**

**Comment agreed. Final AD has been updated accordingly (i.e. 'the second additional work' replaced by 'the additional work')**

**Commenter 2: REGIO LEASE – Emeric Blondeau – 04/06/2025**

### Comment #2

Following the issuance of PAD 25-080 it seems that some additional work is requested depending of the revision of SB 27-3237 that have been embodied.

The question is what happen if the aircraft had embodied SB 27-3237 Rev. 03? Because in the PAD additional works are requested only for SB 27-3237 R00, SB 27-3237 R01 and SB 27-3237 R02.

### **EASA response:**

**Comment agreed. Final AD has been updated accordingly (i.e. SB 27-3237 Rev. 03 - and A340-27-4213 rev. 02 - added in the definition section).**

**EASA confirm that the accomplishment of SB 27-3237 Rev. 03 – or the SB A340-27-4213 rev. 02 - on an aeroplane makes the AD paragraph 4 applicable to this aeroplane.**



**Commenter 3: PLUS ULTRA LÍNEAS AÉREAS, S.A. – Juan Moreno Pérez – 16/06/2025****Comment #3**

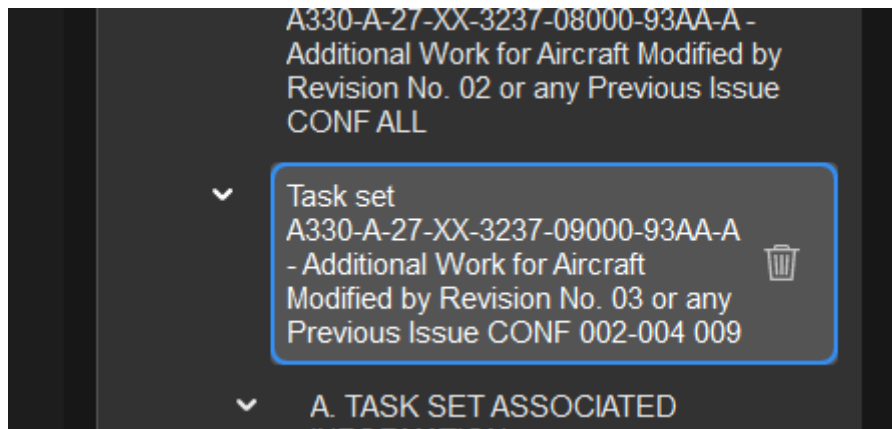
Paragraph (3) gives instructions for additional work if only SB 27-3237 Rev.00 (initial issue) has been embodied.

Paragraph (4) gives instructions for additional work if SB 27-3237 Rev 01 or Rev 02 or Rev 00 plus additional works of Rev01-02 is embodied.

Paragraph (1) mandates installation of the wiring for ELSD as per SB 27-3237 Rev 04.

SB 27-3237 Rev 04 gives additional work (inspection) if SB 27-3237 Rev 03 is embodied (SB Rev1 or Rev 2 + additional work).

The AD does not give any instruction about requirements if SB 27-3237 Rev 03 is embodied.



Could you clarify the instructions if SB 27-3237 Rev 03 is embodied?

There a similar issue with A340 SB.

**EASA response:**

**Comment agreed. See EASA answer to comment #2**



**Commenter 4: European Air Transport Leipzig GmbH – Annemarie Frobel – 23/06/2025**
**Comment #4**

In PAD 25-080, none of the Definitions (SB1a, SB1b, SB1c, SB2) include Airbus SB A330-27-3237 rev. 03. In Airbus SB A330-27-3237 rev. 04 there is no task mentioned which requires additional work for aircraft modified iaw. rev. 03.

Could you please confirm that this AD will not require additional work for aircraft modified iaw. Airbus SB A330-27-3237 rev. 03 only OR previous revisions of the SB and the additional work iaw. rev. 03?

**EASA response:**

**Comment agreed. See EASA answer to comment #2**

**Commenter 5: Delta Air Lines – Justin Brown & Michael D. Tharp – 26/06/2025**
**Comment #5**

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 25-080, dated 28 May 25
- (B) EASA Airworthiness Directive: No. 2024-0016, effective date 25 Jan 24
- (C) Airbus Service Bulletin (SB) A330-27-3237 Rev 02, dated 09 Feb 24
- (D) Airbus Service Bulletin (SB) A330-27-3237 Rev 04, dated 31 Mar 25
- (E) FAA Airworthiness Directive 24-26-06, effective date 11 Mar 25
- (F) Airbus Service Bulletin (SB) A330-27-3237 Rev 03, dated 22 Oct 24
- (G) FAA Alternate Method of Compliance AIR-510-24-00165, dated 08 Oct 24.

**Comment A**
Commenter Request

Where Ref (A) PAD, Modification(s) paragraph (1) refers to “Group 1 aeroplanes”, replace that text with “Group 1 aeroplanes, except as specified in paragraphs (3) and (4) or modified by SB A330-27-3237 Rev 03”.



Request justification

As written, Ref (A) PAD, Modification(s) paragraph (1) implies that all aeroplane MSNs up to and including MSN 1789 must install the ELSD wiring in accordance with Ref (D) including MSNs that have already accomplished Ref (F) and earlier versions. Replacing paragraph (1) text with “Group 1 aeroplanes, except as specified in paragraphs (3) and (4) or modified by SB A330-27-3237 Rev 03” clarifies to operators that only aeroplane MSNs that have not already accomplished Ref (F) or earlier revisions must accomplish the installation of the ELSD wiring in accordance with Ref (D). For reference, the “except as specified in paragraph (3)...” text was used in Ref (E) FAA AD 24-26-06 to clarify for US operators which MSNs needed to accomplish paragraph (1) of Ref (B) EASA AD 2024-0016.

List paragraphs that change; describe (nonobvious) changes

Modification(s) paragraph (1)

**Comment B**Commenter Request

Modify Ref (A) PAD, to add an alternate method of compliance which allows operators within 48 months after 22 March 2022 [the effective date of EASA AD 2022-0039] to accomplish the installation of the ELSD wiring for Group 1 aeroplanes in accordance with Ref (C), provided the required action(s) and compliance time(s) of additional work 1 and additional work 2 are accomplished.

Request justification

After the proposed AD Ref (A) effective date, Modification(s) paragraph (1) will mandate that operators can only accomplish the installation of the ELSD wiring in accordance with Ref (D). In order to comply with the forthcoming FAA AD that mandates compliance of the proposed AD Ref (A), DAL will have to change current work instructions based on the RC instructions of Ref (C), to be verbatim to the RC instructions of Ref (D), including all changes not related to the required actions of the Additional Work 1 and Additional Work 2 paragraphs.

NOTE: DAL is already incorporating the Additional Work provided in Ref (F), which is approved by Ref (G) FAA AMOC.

DAL can address the safety condition in Ref (A) by using our existing work instructions based on Ref (C) and issuing new work instructions to accomplish the RC instructions of the Additional Work 1 and Additional Work 2 in Ref (D). Otherwise, after the effective date of the forthcoming FAA AD associated with the Ref (A) proposed AD, DAL may have to pause accomplishment of our work instructions to update them to the Ref (D) instructions. This may cause us to schedule additional maintenance downtime due to missed scheduled check visits.

(Refer to Comment #1) If Ref (A) proposed AD allows operators to take credit for MSNs that have already accomplished Ref (C) prior to the proposed AD effective date provided operators also accomplish the Additional Work 1 and Additional Work 2 within the Ref (A) proposed AD compliance times, then the proposed alternative method of compliance provides an equivalent level of safety to addressing the safety condition.

List paragraphs that change; describe (nonobvious) changes

Modification(s) paragraph (1)



- o Add “Alternative Method of Compliance Note”

Additional Work 2 paragraph (4)

- o Remove “before the effective date of this AD”

OR

- o Add note if AMOC to use Ref (C) after effective date is acceptable.

**EASA response:**

***Comment 5A) Comment agreed. Final AD has been updated accordingly.***

***Comment 5B) Not agreed.***

***As a general principle, unless duly mentioned in a particular context, EASA does not recommend using previous revision of SB when a later revision has been issued. For the particular case evocated, EASA remind that FAA AD 2024-26-06 (<https://drs.faa.gov/browse/excelExternalWindow/FR-ADFRAWD-2025-02134-0000000000.0001>) including the provision to use later rev of the ref Airbus SB. DAL can already implement later rev of the SB.***

***Finally, EASA cannot consider in its MCAI the particularity of all the NAA processes supporting alternative compliance.***

***Consequently, no changes have been made to the Final AD in response to this comment.***

**Commenter 6: Turkish Airlines – Yahya Ubeyde Güngör – 25/06/2025**

**Comment #6**

As you know, firstly, EASA AD 2022-0039 was issued for “ATA 27 – Flight Controls – Trimmable Horizontal Stabilizer Actuator / Electric Load Sensing Device – Modification,” and this AD gave 48 months from the effective date (22 March 2022) of this AD as compliance time for the Modification(s). Then, EASA AD 2024-0016 was issued, reinstating the same compliance time. This PAD No.: 25-080 is also reinstating the same compliance time for the aircraft previously not modified.

When EASA AD 2022-0039 was issued, Airbus SB (the SB1) A330-27-3237 Revision 00 existed. This SB has been revised 4 times since then, changing accomplishment instructions and materials. KITs have continuously been revised, changed, and cancelled. This results in material planning and receiving processes becoming more difficult. Therefore, the circumstances at the issuance of EASA AD 2022-0039 are not the same as those at the issuance of this PAD due to the revisions of the SB. For this reason, could you consider extending the compliance time of the modification for the aircraft previously not modified? We kindly request at least 6 months of extension.



***EASA response:***

***Comment not agreed. The Compliance Time has been already extended to October 2026 to allow embodiment of additional work. No changes have been made to the Final AD in response to this comment***

