

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-088

[Published on 18 June 2025 and officially closed for comments on 02 July 2025]

### Commenter 1: Cathay Pacific Airways Limited – Sam Woon – 02/07/2025

#### Comment #1

With reference to the new PAD 25-088 requirement to update the AFM to the listed DUs. Cathay Pacific Airways (CPA) would like to seek clarification and provide our comment.

The AFM DUs listed in the PAD were issued/published before the HMCA S6 software upgrade. CPA had reached out to Airbus and which confirm that the HMCA S6 software upgrade does not trigger any AFM upgrade.

On the other hand, CPA note that there are changes to other FOP documentations (FCOM, MMEL) associated with HCMA S6 software upgrade but these are not listed by the PAD.

Hence CPA would like request EASA to consider reviewing the PAD and the list of FOP documentations that are associated with HCMA S6 software upgrade

#### EASA response:

**Comment not agreed. EASA confirm the requirements as anticipated in the PAD.**

**Airbus can be further contacted to seek for more background details behind the several design evolutions ultimately covered by this AD, and associated AFM impact.**

**It is EASA policy not to mandate FCOM updates, as that manual is not part of the approved a/c configuration.**

**MMEL updates have not been deemed required in the frame of this AD. Its implementation is therefore not regulated by this AD.**

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



**Commenter 2: Virgin Atlantic – Timothy Chambers – 04/07/2025****Comment #2**

Ref – PAD 25-088 (ATA 29) – Hydraulic Power – Engine Driven Pump – Software Update / Modification (attached with this email), dated 18 June 2025. Virgin Atlantic (VIR) have reviewed the above listed PAD and would like to raise a comment, specifically about Section ‘Concurrent Requirements / Additional Modification:’

One of our affected A350-1000s (MSN 647) will comply with this section through Note 2 (see below), as it was modified with SB A350-42-P020 in production. The aircraft has complied with all the listed modifications but not **117752L48885** per the aircraft configuration we receive from Airbus. On doing some investigation into this, we believe that this modification is only applicable to aircraft that have been previously modified with mod 117080 (activate ETC 26FE associated with an IFE Smoke alert) which was applicable to A350-900s only.

As such, and per our understanding (to be confirmed with Airbus), all A350-1000s that have been modified with A350-42-P020 in production will not be able to comply with this PAD per the current wording as it is shown below. We believe modification **117752L48885** should be removed from this list.

**Note 2: For an aeroplane on which Airbus mod 116964L06016, and 117601L48911, and 117602L48912, and 117603L48913, and 117751L48884, and 117752L48885, and 117753L71035, and 117761L91141, and 117966L48979, and 117966L49214 and 118677L49166 have been embodied in production, the Concurrent Requirements / Additional Modification as required by paragraph (2) of this AD are not applicable.**

VIR have highlighted this to Airbus this morning and we are waiting for a response to see if we are correct.

However, in advance of Airbus getting back to us, we would like to draw EASAs attention to this query and request that you also confirm the applicability of modification **117752L48885** before publishing the AD associated with this PAD.

**ADDENDUM dated 04 July 2025**

Just to clarify my concern – Point (2) requires A350-42-P020 to be embodied, either in service (by applying SB A350-42-P020) or in production via the production mods listed in Note 2. Possibly my wording below was misleading, but you cannot comply with the Service Bulletin A350-42-P020 in production, it has to be via the listed production mods.



Our A350-1000 (MSN 647) has been embodied in production, per the PAD wording, we need to comply with all the listed production mods to make point (2) not applicable. We can not comply with all the mods as 117752L48885 does not appear to be applicable to A350-1000s. As such, we believe this should be removed from the list.

***EASA response:***

***Comment agreed.***

***Note 2 has been amended to instruct operators to refer to Airbus SB A350-42-P020, providing a complete list of Airbus mods that, if applied in production, depending on aeroplane configuration, are equivalent to the Concurrent Requirement as required by paragraph (2) of the AD.***

