

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-096

[Published on 27 June 2025 and officially closed for comments on 25 July 2025]

Commenter 1: China Southern Airlines Co. Ltd. – Zhou Jiuzhou – 30/06/2025

Comment #1

1. For the definition of **Affected part**, is the part for which has been deployed in flight and subsequently retracted in accordance with the instructions of the MP task, as defined in this AD serviceable or still affected after being repaired?
2. Please help add the clarification for Q1 to this AD.

EASA response:

Comment noted. EASA AD requires any affected part to be replaced within 4 years after the AD effective date. In case the affected part underwent any repair during the shop visit, which has not introduced a P/N change, and consequently the RAT P/N is still 1713586A, that RAT is still an affected part, provided it has been deployed in flight and subsequently retracted in accordance with the instructions of the MP task, as defined in the AD. No repair procedure can be an alternative procedure to the RAT replacement. In addition, please see the answer to Comment #5 of this CRD. No changes have been made to the Final AD in response to this comment.

Commenter 2: China Southern Airlines Co. Ltd. – Zhou Jiuzhou – 30/06/2025

Comment #2

One query added, for Additional Maintenance Requirements(2), it requires operators not to accomplish any maintenance action on an aeroplane in accordance with the instructions of the MP task, as defined in this AD.

Then we would like to ask:

1. Which revision is this MP task, as defined in this AD, added into the whole Line Maintenance manual?
2. Will this MP task, as defined in this AD, certainly not being added to that later revision of the whole Line Maintenance manual?



EASA response:

Comment noted. Airbus updated the RAT retraction Maintenance Procedure (MP) “TASK A350-A-24-24-XX-00001-398A-A - Retraction of the RAT Module on the Ground” in the revision issued in November 2023. Any maintenance actions on an aeroplane accomplished in accordance with the instructions of the MP task A350-A-24-24-XX-00001-398A-A revision date November 2023 or after November 2023 are not affected by the requirements of this AD.

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

Commenter 3: British Airways PLC – Chris Wild – 08/07/2025
Comment #3

Considering the definition of an ‘Affected part’ being a Ram Air Turbine of P/N 1713586A which has been deployed in flight and subsequently retracted IAW the MP task – If the RAT has been deployed during a production/test flight of the aircraft by Airbus, prior to Transfer of Title (ToT) of the aircraft; does this qualify the RAT as an affected part with respect to this requirement, or are in-flight deployments after ToT considered only?

EASA response:

Comment agreed. It has been confirmed that the RATs which have been deployed during a production/test flight of the aircraft by Airbus, prior to transfer of title of the aircraft are not affected by the requirements of this AD. The definition of the affected part has been amended accordingly in the Final AD.

Commenter 4: FIJI Airways – Muhammed Arshad Hafeez – 14/07/2025
Comment #4

In accordance with the subject EASA PAD and AIRBUS SB A350-24-P149, we understand the AIRBUS MP A350-A-24-24-XX-00001-398A-A has been revised to include the following condition for RAT Retraction;

Stop this procedure and remove the RAT module if:

- The Part Number (P/N) of the RAT module is 1713586A, and
- The RAT module was extended in flight, and



- The functional test of the RAT system Ref. MP A350-A-24-24-XX-00ZZZ-340Z-A was not satisfactory in the last 3 flight cycles or 30 days.

So, we believe that this implies, if the functional test of the RAT was satisfactory in the last 3 FC or 30 days prior to deployment, the RAT can be restowed normally as per the MP and no further action required. Is this understanding correct?

Using the logic of the revised MP TASK A350-A-24-24-XX-00001-398A-A, suppose an A350 aircraft had its RAT (P/N: 1713586A) deployed in flight, and had it retracted as per the MP procedures before November 2023 MP revision. However, afterwards, for that same aircraft, the MPD TASK 242400-00M01 task was performed and RAT operational/functional checks were satisfactory, does it exempt that aircraft from having the RAT removed and sent to supplier?

EASA response:

Comment not agreed. The satisfactory accomplishment of MP TASK A350-A-24-24-XX-00001-398A-A post in flight RAT deployment does not allow to consider such RAT as a serviceable part, hence such RAT is still subject to the replacement requirement as per paragraph (1) of this AD.

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

Commenter 5: Delta Air Lines, Inc. – Brian Duff & Michael D. Tharp – 21/07/2025

Comment #5

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 25-096, dated 27 June 25
- (B) Airbus Service Bulletin (SB) A350-24-P149, dated 20 June 25
- (C) Maintenance Procedure (MP) task A350-A-24-24-XX-00001-398A-A, revision date prior to November 2023
- (D) Airbus RETROFIT INFORMATION LETTER – RIL V24M25000509 R00, dated 23 June 25
- (E) UTC Aerospace Component Maintenance Publication HSRAT-99167-00001-00 (24-24-14)

Commenter Request

Modify Ref (A) PAD, Definition paragraph, to add clarification to the “Serviceable Part” definition.

Request justification

Ref (A) “Affected Parts” and “Serviceable Parts” definitions, together with the following statement in the “Reason” work together to imply that an “Affected Part” can never be installed on an aircraft again:

“This AD also prohibits (re)installation of affected part, ...”

Ref (B) step 3.C.(1) Task A350-A-24-XX-P149-02001-920A-A sub step (c) states to “Install the new **or serviceable or modified** RAT module ...”



Ref (D) provides the following unserviceable RAT return instruction to operators:

“This RAT has been removed as per Airbus SB 24-P149 and RIL V24M25000509 following in-flight deployment before November 2023 and must be inspected and repaired accordingly.”

The PAD ref (A) information and the Airbus refs (B) and (D) instructions need to be reconciled to clearly say the same thing.

If it is EASA’s intent that an “Affected Part” that has been inspected, repaired and returned to service per the ref (E) CMP becomes “Serviceable Part”, per the PAD definition(s), then the PAD needs to be revised to reflect that allowance/process. As written today, the PAD does not provide a path for an “Affected Part” to ever become a “Serviceable Part”.

List paragraphs that change; describe (nonobvious) changes

- Definitions:
 - Revised Definition of “Serviceable Part”:

“Serviceable part: RAT Module eligible for installation in accordance with Airbus instructions, which is not an affected part or an Affected Part that has had its blade bearings inspected and repaired and has been made serviceable per the requirements of ref (E).”

EASA response:

Comment not agreed. Every RAT replaced in accordance with the instructions of Airbus SB 24-P149 must be returned to Collins. Based on information provided by Airbus, every RAT returned to Collins will be inspected and, regardless of any potential corrosion finding, bearings will be replaced. The implementation of such modification will also trigger the RAT P/N change, hence such RAT will meet the serviceable part definition.

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

Commenter 6: China Southern Airlines Co. Ltd. – Zhou Jiuzhou – 31/07/2025

Comment #6

As A350 Continued Airworthiness Team said, if no PN change (i.e. the RAT PN is still 1713586A), the affected RAT defined by this PAD No.: 25-096 is still affected although after being repaired. That would mean the only one way to remove an affected RAT from being affected for the RAT with PN 1713586A is discarding.

Then will you please help support:

1. Add this discarding requirement in the future AD.
2. If not for Q1, please provide a feasible method in the future AD to remove the affected status from being affected.



EASA response:

Comment noted. Please see the answer to Comment #5.

