

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-098

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

Commenter 1: Eurowings Technik GmbH – Florian Kürten – 02/07/2025

Comment #1

Following our review of the proposed AD, we would like to respectfully suggest that, in addition to referencing seats with Amdt. D as a means of compliance, the inclusion of Safran Service Bulletin [168-25-009], Revision 00, may also be considered as an acceptable means of compliance. From a technical standpoint, Revision 00 should provide sufficient instructions to ensure compliance with the requirements set forth in the proposed AD.

EASA response:

Comment not agreed.

The Revision 00 of the SB was indicating the parts as interchangeable, which contradicts with the part(s) installation requirements of the AD.

Please note that if the Revision 00 was applied, it is expected that the seat is already identified with Amdt. D. If this is the case, the seat has to be considered as serviceable seat as defined in the AD.

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

Commenter 2: All Nippon Airways – Yoshikazu Kondoh – 24/07/2025

Comment #2

Our understanding is based on the following points within the referenced PAD:

- **Parts Installation (2):** This section states that after the effective date of the Airworthiness Directive (AD), the Affected Part (P/N 168000VI-82) must not be installed on a "Serviceable Seat," which is defined as a Third Occupant Seat at Amdt D or with a serial number of 17T0001 or subsequent.
- **Absence of Prohibition:** We have not found a specific requirement in the PAD that prohibits the installation of a "Not Serviceable Seat" (i.e., a Third Occupant Seat prior to Amdt D or with a serial number before 17T0001) onto an aircraft.



Based on these points, our interpretation is as follows:

It is permissible to install a "Not Serviceable Seat" (a seat prior to Amdt D or S/N 17T0001) onto an aircraft, provided that the modification to Amdt D, as mandated by the **"Modification (1)"** section of the PAD, is accomplished within the specified compliance time.

Could you please review our interpretation and confirm whether it is correct?

EASA response:

Comment agreed.

The assumption is correct. The AD requires that no affected seat with an affected part embodied will be installed.

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

Commenter 3: American Airlines – Garrett Long – 28/07/2025

Comment #3

- 1) In the Definitions section of the PAD, an affected seat is defined as "168 series third occupant seats not identified with Amdt D." but a serviceable seat is defined as "Any seat that is identified with Amdt D; or an affected seat having a serial number 17T0001 (inclusive) or above." American Airlines proposes that these statements should include the full seat MPNs, define all SN Options (as 17T0001 is not a number, so the term "below" is ambiguous) and that the serviceable seat description should contain an opposite description of the affected seat at a minimum for consistency and clarity.
For example, an affected seat could be defined as "Third occupant seats, having Part Number (P/N) 16800-00-00, P/N 16800-01-00 or P/N 16800-01-01, with serial number 17T0000, 16TXXXX, 15TXXXX.... or 10TXXXX (where X denotes any numerical value) not identified with Amdt D." and serviceable seat could be defined as "Third occupant seats, having Part Number (P/N) 16800-00-00, P/N 16800-01-00 or P/N 16800-01-01, with serial number other than 17T0000, 16TXXXX, 15TXXXX.... or 10TXXXX (where X denotes any numerical value), or with serial number 17T0000, 16TXXXX, 15TXXXX.... or 10TXXXX (where X denotes any numerical value) identified with Amdt D."
- 2) In the Required Action(s) and Compliance Time(s) section of the PAD, the Modification instructions say to replace the affected parts with serviceable parts in accordance with the SB and the Part(s) Installation instructions say not to install any affected part on a serviceable seat. However, the affected part is defined in the Definitions section as being Screw P/N 168000VI-82, and this screw is installed in other locations on the seat which are not replaced as a part of the SB.
American Airlines proposes that these statements be modified to indicate that the affected screw should not be installed in the location indicated by the SB. For example, the Part(s) Installation could be changed to read "From the effective date of this AD, do not install any affected part on a serviceable seat in the locations indicated in the SB"



- 3) In the SB 168-25-009 Rev 2, the SB requires that a helicoil MPN F030122 be removed and replaced. However, this helicoil is not shown in Figure 1 in the SB, and instead a statement “NOTE : Helicoil is not represented on the figure 1. It is located at the same position as the bushing (item 55) and the screw (item 65)” is present in the SB.
American Airlines proposes that the SB should be revised to show the precise location of the helicoil.
- 4) In the SB 168-25-009 Rev 2, the SB removes item 55, item 65, and a helicoil not shown, but does not reference the spacer shaft (item 60) which also appears to need to be removed and retained during the replacement of the screw.
American Airlines proposes that the spacer shaft be removed, retained, and re-installed in the SB.
- 5) In the SB 168-25-009 Rev 2, detailed instructions of disposition of parts are not included in the removal or installation of the screw.
American Airlines proposes that disposition instructions be provided as instruction steps (not notes) for each part removed, and that descriptions be added to each installed part as either new or retained.
- 6) In the SB 168-25-009 Rev 2, there is a note which states “Check the good positioning of the helicoil : it should not protrude from bottom equipped”. However, per common practice, instructions which must be actioned should not be in notes, as they may be skipped over by maintenance.
American Airlines proposes that this note be made a step to ensure it is accomplished.
- 7) In the SB 168-25-009 Rev 2, Steps 3.D.1. states “Complete the modification placard P/N 00-6414 or F0554722 or add the modification placard P/N F0554722 (Figure 2) on each modified seat to indicate that this SB 168-25-009 and its revision has been completed. It should be installed near the existing seat identification placard”, and step 3.D.2 states “Complete the amendment box “AMDT” with the mention “D” on seat using an indelible marker.”.
American Airlines proposes that these two steps be combined to prevent confusion, as the AMDT D should be recorded at the same time the SB and date are recorded, before the tag is installed. After step 3.D.2, there is an example of how to fill out the placard. However, this example does not show how to record the SB revision, as required in step 3.D.1, nor does it specify the format in which the accomplishment date should be recorded, only dashes are shown.
American Airlines proposes that this example be corrected to clearly explain how to mark the seat has had the SB accomplished. Lastly, there is no figure showing where to install the modification placard. American Airlines proposes a figure 3 be added to show where the modification tag should be installed. For example, American Airlines proposes that the steps be re-written as:

EXAMPLE OF THE PROPOSAL ON NEXT PAGE

1. On the existing modification tag, or new modification tag MPN F0554722 from kit (Figure 2), record the following:
 - a. Under “AMDT”, enter “D”
 - b. Under “SB REF.”, enter “168-25-009 REV 2”
 - c. Under “DATE”, enter the date of accomplishment of this SB in the format DD/MM/YY

EX:



AMDT	SB REF.	DATE
D	168-25-009 REV 2	DD/MM/YY

2. If installing a new modification placard, install filled out modification tag near existing seat identification placard (Figure 3 – Modification placard installation location)
- 8) In the SB 168-25-009 Rev 2, Steps 3.D.1. the SB implies that the installation of the modification placard is optional and that an existing tag may be used, but Step 3.D.3 implies that the installation of the transparent plastic film is required even if an existing tag is present. American Airlines proposes that notes be added to steps 3.D.1. and 3.D.3 to clarify that installation of the modification placard is optional and an existing modification placard may be used, but the transparent plastic film must be installed even if an existing modification placard and transparent film are already installed.
- 9) In the SB 168-25-009 Rev 2, Steps 3.D.2. the SB requires the AMDT be recorded with an indelible marker. However, Step 3.D.1. does not have the same requirement for recording the SB number and date. American Airlines wishes to create a small placard with the SB and AMDT already written for installation on the mod tag during accomplishment of this SB to assist maintenance with recording the SB and amendment properly and proposes that the requirement to use an indelible marker for recording be removed for the AMDT to allow Airlines to record in a manner they see fit. American Airlines would also like to point out that the record will be covered with a clear film, so the record will be preserved regardless of the marker, pen, or placard used.

EASA response:

- 1) ***Comment not agreed. The instructions provided in the AD are sufficient to determine an affected or serviceable part.***
- 2) ***Comment agreed. Paragraph (2) of the AD was amended accordingly to add “in the locations indicated in the SB”***
- 3)-9) ***The SB, as defined in the AD is now at Revision 03, so was updated by Safran accordingly.***

Commenter 4: United Airlines – Elliot Taylor – 25/07/2025

Comment #4

References:

A. EASA PAD 25-098

B. Safran Seats France Service Bulletin (SB): 168-25-009

United Airlines (UAL) has reviewed reference A, Notice of Proposal to issue an Airworthiness Directive, and provides the below comments regarding the contents and proposed actions listed in reference B for UAL's effective aircraft.



1. Service Bulletin/Compliance Documents a. United have reviewed the work required and have no feedback regarding the procedures or requirements.
2. Timeline
 - a. United observes the anticipated requirement of completion within 36 months of AD issuance. This will be in work ahead of the AD release.
 - b. United estimates approximately 1 hour for screw replacements, achievable on overnight line holds.

EASA response:***Comment noted.******No change has been made to the final AD in response to this comment.***