

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-098R1

[Published on 26 February 2026 and officially closed for comments on 12 March 2026]

Commenter 1: Singapore Airlines – Soh Kian Ann – 02/03/2026

Comment # 1

- Although PAD mandates the use of Safran Seats SB 168-25-009 Revision 3 dated 03 February 2026, can EASA advise if accomplishment of Safran Seats SB 168-25-009 Revision 2 dated 10 April 2025 can be taken credit for this AD?
- Safran Seats SB 168-25-009 Revision 3 dated 03 February 2026 defines effectivity as:

EFFECTIVITY

This Service Bulletin is applicable to 168-series seats as follows :

Seats P/Ns : 16800-00-00 without Amdt D (S/N until 16T2686 excluded)

16800-01-00 without Amdt D (S/N until 16T2686 excluded)

16800-01-01 without Amdt D (S/N until 16T2686 excluded)

NOTE : SB168-25-009 is applicable to the seat S/N XXYYYY if one of the 2 conditions below is met :

- XX (manufacturing year) is strictly below 16
- XX (manufacturing year) is equal to 16 and YYYY (seat reference in the yearly sequence) is strictly lower than 2686.

However, PAD 25-098R1 defines applicability as:

Affected seat: 168 series third occupant seats not identified with amendment (Amdt) D, except those having a serial number 17T0001 (inclusive) or above.

For a third occupant seats with SN 16T3011, it will be NA as per SB but APPLICABLE as per PAD.

Please advise whether this inconsistency is intentional and whether we should follow PAD's applicability.

EASA response:

A. Comment agreed. Revision 01 or Revision 02 can be taken as credit. The credit paragraph (3) has been updated accordingly.



B. Comment agreed. The affected part definition in the AD was further aligned with the SB. Those parts having s/n 16T2686 or later are not defined as affected parts in the AD.

Commenter 2: Cathay Pacific Airways Limited – Tommy Liu – 05/03/2026

Comment # 2

We would like to seek EASA's clarification regarding the applicability definition in PAD No. 25 098R1 in comparison with Safran Seats SB 168 25 009 Revision 3, as the current wording appears to be interpreted differently by operators.

According to PAD 25 098R1, the definition of an affected seat is stated as:

"168 series third occupant seats not identified with Amendment D, except those having a serial number 17T0001 (inclusive) or above."

Based on this definition, seats without Amendment D but having serial numbers 17T0001 and above would be considered not affected, and therefore classified as serviceable seats per the PAD.

However, SB 168 25 009 Revision 3, Section 1/A (Effectivity), defines applicability as:

Seats P/N 16800 00 00 / 01 00 / 01 01 without Amendment D, Seat S/N until 16T2686 excluded,
with the explanatory note that the SB is applicable only when:

- manufacturing year is strictly below 16, or
- manufacturing year is 16 and sequence number is below 2686.

This creates confusion for operators, as the SB appears to define a different serial number cut off compared with the PAD.

For CPA fleet, the concerned seats installed are Safran 168 series third occupant seats with serial numbers 20T0430 through 24T1687 (installed on aircraft B HPB through B HPT). These serial numbers are above 17T0001 and the seats are currently not identified with Amendment D.

We would appreciate EASA's confirmation on the following points:

- a. Can EASA confirm that seats without Amendment D but with serial numbers 17T0001 and above are not considered affected seats under PAD 25 098R1?
- b. If confirmed, may these seats be considered serviceable seats as defined in the PAD, with no modification required under PAD 25 098R1?
- c. Can EASA clarify whether the serial number criteria in PAD 25 098R1 intentionally supersede the SB applicability definition in SB 168 25 009 Rev.3, for regulatory compliance purposes?

EASA response:



- A. Comment agreed.**
- B. Comment agreed.**
- C. Comment noted. See answer to comment 1. Seats having S/N 16T2686 or above are considered serviceable seats. The AD definition of affected part was changed accordingly.**

Commenter 3: American Airlines – Garrett E. Long – 06/03/2026

Comment # 3

In the Definitions section of the PAD, an affected seat is defined as “168 series third occupant seats not identified with amendment (Amdt) D, except those having a serial number 17T0001 (inclusive) or above” but SB 168-25-009 Rev 3 says it is applicable to “S/N until 16T2686 excluded” with the note: “SB168-25-009 is applicable to the seat S/N XXTYYYY if one of the 2 conditions below is met :

- XX (manufacturing year) is strictly below 16
- XX (manufacturing year) is equal to 16 and YYYY (seat reference in the yearly sequence) is strictly lower than 2686.”

American Airlines proposes that the Affected seat statement in the PAD be aligned with the applicability statement in SB 168-25-009 Rev 3.

In the SB 168-25-009 Rev 3, Steps 3.D.1. states “Complete as follows 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”. Step 3.D.2 states “If installing a new modification placard, it should be installed near the existing seat identification placard, as shown on figure 3.” Both these steps appear to install a new amendment placard.

American Airlines proposes Step 3.D.1 be changed to say, “Complete as follows the existing modification placard P/N 00-6414 or F0554722 or add the new modification placard P/N F0554722...” so that step 3.D.1 only completes the amendment placard and step 3.D.2 is the only step that installs the new amendment placard if needed.

In the SB 168-25-009 Rev 3, Steps 3.D.1. states that “168-25-009 Rev 2” should be entered for the SB REF Field on the amendment placard and also shows an example of the entry which also shows “168-25-009 Rev 2”. However, SB 168-25-009 is now at Rev 3.

American Airlines proposes Step 3.D.1 be changed to match the current revision of SB 168-25-009.

EASA response:



Comment noted. See answer to comment 1 regarding the first questions. The AD definition of affected part was changed accordingly.

Regarding the second part of the question, indeed there is a typographical error in the SB, which may be corrected in a next revision of the SB. Further, “existing” and “new” may be added in the step 3.D.1 to avoid any risk of misunderstanding.

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

