

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-104R1

Published on 04 May 2026 and officially closed for comments on 18 May 2026

Commenter 1: Gulf Air B.S.C. – Lala Ajmal – 05/05/2026

Comment # 1

Under the Required Action and Compliance Time, it is mentioned in Terminating Action Paragraph (3) Note 1:

"Note 1: The instructions for modification include accomplishment of a rototest inspection; accomplishment of that rototest inspection is required by paragraph (3) of this AD"

We understand, the rototest inspection is the requirement of Paragraph (1) and the Note 1 should be as follows:

"Note 1: The instructions for modification include accomplishment of a rototest inspection; accomplishment of that rototest inspection is required by paragraph **(1)** of this AD"

Your clarification on above point would be greatly appreciated.

EASA response:

Comment agreed.

Note 1 is a reminder that also a rototest inspection is part of the modification, as described in the modification SBs, and must be accomplished during the same maintenance visit during which the modification is accomplished.

The Note 1 was adapted for clarification.

Commenter 2: Sudan Civil Aviation Authority – Mohamed Salih – 13/05/2026

Comment # 2



Since this PAD indicates that damages were reported during the accomplishment of (AD 2024-0147), will the final AD that will be published in relation to this PAD, supersede AD 2024-0147R1? Consider that, this PAD indicates different inspection SB, different modification SB and different repetitive intervals.

EASA response:

Comment not agreed.

This AD does NOT supersede AD 2024-0147R1 as it considers a different location (hole C1). For simplification due to different mandatory actions, it was considered a separate AD.

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

Commenter 3: Deutsche Lufthansa AG. – Florian Schmucker – 13/05/2026

Comment # 3

DLH CAMO would like to give the following two comments regarding PAD 25-104 R01.

A. Repetitive Inspection(s) (1):

DLH believes that in **Table 1** and **Table 2** the “and/or” logic for group 2 and 3 is incorrect and either an “and” logic or an “or” logic must be used instead.



Table 1 - Initial Inspection for A318 aeroplanes

FC and FH Accumulated on the effective date of this AD since aeroplane first flight	Compliance Time
Less or equal to 30 000FC and less or equal to 60 000 FH	A or B, whichever occurs later A) Before exceeding 30 000 FC or 60 000 FH since aeroplane first flight, whichever occurs first B) Within 5 000 FC or 10 000 FH after the effective date of this AD, whichever occurs first
Less than 44 500 FC and 89 000 FH, and more than 30 000 FC and/or more than 60 000 FH	A or B, whichever occurs first A) Within 5 000 FC or 10 000 FH, whichever occurs first after the effective date of this AD B) Before exceeding 47 000 FC or 94 000 FH since aeroplane first flight, whichever occurs first
Equal or more than 44 500 FC and/or 89 000 FH	Within 2 500 FC or 5 000 FH after the effective date of this AD, whichever occurs first

B. Credit (5):

DLH believes that the credit paragraph does not cover the option, that aircrafts with accomplished ISBs/MSBs before the effective date of the AD with **no** additional instructions of an Airbus RDAF are also acceptable to comply with paragraph (1) and (3) of this AD. Therefore, we propose the following wording for Paragraph (5):

“Inspection(s) and modification(s), accomplished on an aeroplane before the effective date of this AD in accordance with the instructions of the inspection **SB at original issue** or **SB at original issue supplemented** by the additional instructions of an Airbus RDAF as defined in the inspection SB, or in accordance with the instructions of the modification **SB at original issue** or **SB at original issue supplemented** by the additional instructions of an Airbus RDAF as defined in the modification SB, as applicable, are acceptable to comply with the requirements of paragraph (1) and (3) of this AD, as applicable, for that aeroplane.”

Our assumption is substantiated by the definition of the recommendation paragraph (3.) in the Airbus SBIT 25-0041 Rev.00 dated 26-SEP-2025. This SBIT states that an RDAF can be provided on request for the discrepancies in the procedures of the ISBs/MSBs. No additional work is required for aircraft that have already embodied Referenced ISBs/MSBs for the issues described in this SBIT.

However, as the current credit paragraph is defined, these aircraft – as defined in the SBIT – do not comply with the requirements of the AD.

Therefore, DLH requests EASA to revise both paragraphs accordingly.

EASA response:

- A. *Comment not agreed. The and/or condition is necessary to facilitate all possible combinations.*
- B. *Comment not agreed. The proposed wording would allow to only accomplish the SB at original issue, which can not be taken as credit for this AD. Any deviations to the SB instructions not covered by Airbus approved instructions, should be addressed to the local registry authority for acceptance.*

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

Commenter 4: Ryanair – Lucas Lacerda – 18/05/2026

Comment # 4

Ryanair request clarification as explained below.

PAD 25-104R1 defines "modification SB" as Airbus SB A320-53-1534 Revision 01 or A320-53-1535 Revision 01, as applicable.

According to paragraph (3) of PAD 25-104R1:

Modification of the affected areas on an aeroplane in accordance with the instructions of the modification SB constitutes terminating action for the repetitive inspections as required by paragraph (1) of this AD for that aeroplane (see Note 1 of this AD).

So, based on the definition provided, accomplishment of Airbus SB A320-53-1534 Revision 01, including the rototest inspection (as per Note 1), constitutes terminating action for the repetitive inspections required.

Additionally, according to paragraph (5) of PAD 25-104R1:

*Inspection(s) and modification(s), accomplished on an aeroplane before the effective date of this AD in accordance with the instructions of the inspection SB at original issue supplemented by the additional instructions of an Airbus RDAF as defined in the inspection SB, **or in accordance with the instructions of the modification SB at original issue supplemented by the additional instructions of an Airbus RDAF as defined in the modification SB, as applicable, are acceptable** to comply with the requirements of paragraph (1) and (3) of this AD, as applicable, for that aeroplane.*

Based on PAD paragraph (5), clarification is requested on whether an aircraft that embodied SB A320-53-1534 Rev. 00 (original issue), including the rototest inspection per PAD Note 1, without findings or deviations and prior to the AD effective date, can be considered compliant with the terminating action of PAD paragraph (3), even if no Airbus RDAF was issued.



For reference, Airbus has stated via Technical Request that no RDAF is required for aircraft that accomplished SB A320-53-1534 Rev. 00 without findings or deviations.

Please confirm that such aircraft may use the PAD paragraph (5) as credit and that the modification can be considered a terminating action.

EASA response:

Comment not agreed.

The modification SB (at Revision 01) lists all RDAF and/or Technical Adaptions (TA) that satisfy the requirements of the Revision 01. For any RDAF not listed in the SB at revision 1, case by case management applies with issuance of AMOC as applicable. No change has been made to the final AD in response to this comment.

