

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-104

[Published on 16 July 2025 and officially closed for comments on 13 August 2025]

Commenter 1: LATAM – Christina Gomez – 13/08/2025

Comment #1

Regarding PAD 25-104 and the established compliance times, we have conducted a detailed analysis and it was identified that, according to Table 2 of the PAD, 37 of our aircraft that have a compliance threshold of "within 5,000 FC or 10,000 FH from the effective date of this AD" will not reach their next major maintenance check before the task becomes overdue (we considered the cycle and hour count from the PAD issuance date). This situation could have a significant impact on our operation.

Therefore, we kindly request that you evaluate the possibility of extending the task compliance interval from 5,000 cycles to 6,000 cycles, which matches the usual period between major maintenance checks.

EASA response:

Comment noted.

For an aircraft registered in an EASA Member State, the National Aviation Authority of the Member State can grant individual (temporary) exemptions on AD compliance time in the event of unforeseen urgent operational circumstances or operational needs of a limited duration, in accordance with Basic Regulation, Article 71.

For any other aircraft, the State of Registry authority should be contacted.

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

Commenter 2: Deutsche Lufthansa AG – Florian Schmucker - 30/07/2025

Comment #2

DLH would like to give the following comment regarding Para. (1) **Repetitive Inspection(s)** of PAD 25-104 :



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 30 000 FC 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

Therefore, DLH requests EASA to revise the paragraph accordingly.

EASA response:

Comment partially agreed. The CT definition is modified to removed the “and more...” condition. The (P)AD has been updated accordingly.

Commenter 3: Lufthansa Technik AG – Markus Ripperger – 16/07/2025



Comment #3

Please be informed, that LHT has found several mistakes in the required documents (SBs) of this PAD. Information has already been shared with Airbus via airbus world and tech request.

Airbus offered to issue a RDAF for A/C with the corrected information / procedure.

LHT has the opinion, that incorrect SBs should not be mandated by an EAD at all before they are corrected. Especially when Airbus was already informed about the mistakes by the Operators/MROs.

The correction of the SB content should take place before final publication of an AD. Otherwise, every customer has to request a RDAF for his fleet or for each single A/C.

Quote:

Tech Request: **81569623**

Whilst assessing the mentioned bulletins, LHT identified following - very likely typo - issues:

A320-53-1532, -1533, -1534, -1535:

- Para 3/E. TEST (b): Repeated entry for operational test of cargo compartment system with different ATA References. (Second entry meant to be fuel system test maybe?) - See attached picture "TechReq_1.jpg"

A320-53-1532:

- Nut, which is removed in Task 3.B.(3) (m) (TAT piping removal on LH) does not appear on install side in Task 3.D.(2) (h) (TAT piping installation). This nut is to be found as Item No.4. on Fig.BK installation of the accesses. The nut is also not listed in the Part Kit 531532D02R02 nor in 531532D04R02.

A320-53-1532 (CONF002):

- Removal of RH side items (recirc. check valve and cabin recirc. fan) as part of the Task 3.B.(3) which is dedicated to the removal of access panels and MSI items on the Left Side. See attached picture "TechReq_2.jpg"

A320-53-1532 (CONF002):

- From the installation of the access panels and MSI parts for Conf 002, RH side (3.D.(4) Task) the installation of the cabin recirculation fan (FIN 14HG) and the recirculation check valve (FIN 4021HM) are missing from the procedure.

/Quote

EASA response:

Comment noted.

The PAD has been re-issued addressing this topic.



The definition of the inspection and modification SB was amended and a Credit paragraph (paragraph (5)) was added.

