

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-105

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

Commenter 1: Swiss International Air Lines Ltd. – Vanessa Rohr – 12/08/2025

Comment #1

EASA published PAD 25-105 mandating SB 53-1303. SWR contacted Airbus to get a full version of SB 53-1303 to check for applicability within our fleet, without success, as this is a SB related to ESG only (which is a payed service).

Applicability via Modstatus only is not sufficient, when it comes to second hand aircraft purchased on the market.

Therefore SWR request is to publish an Annex with all applicable MSNs in order to show compliance.

EASA response:

Comment partially agreed.

The applicability of the AD can be determined based on the modification(s) installed on an aeroplane. The SB is not necessary for that.

As described in the reason of the AD, the AD actions are for aeroplanes to be operated or operating in ESG. In case an operator decides to operate an aeroplane in ESG, Airbus has to be contacted accordingly.

The applicability of the final AD was amended to specify that the AD only applies to aeroplanes operated or to be operated in ESG in response to this comment.

Commenter 2: Lufthansa CityLine GmbH – Reka Leingruber – 24/07/2025

Comment #1

In the PAD No. 25-105 I found some of our A321-211 aircrafts (MSN 1988, 3504) affected by the “Applicability” section, but these aircrafts are not affected by the SB A320-53-1303 effectivity, which means, the required inspection and modification can not be accomplished as mentioned in the “Required Action(s) and Compliance Time(s)” section of this PAD (later AD).

Could you please confirm, if this AD will not be applicable for our MSNs, or the SB A320-53-1303 effectivity will be extended?

EASA response:

Comment noted. See answer to Comment 1.

Commenter 3: M&E Center Spring Airlines Co. Ltd. – Li Yang – 22/07/2025

Comment #1

After reviewed PAD 25-105, we found the description of "The affected area: Fastener holes at the forward and aft upper corner of the bulk cargo door at section 16 and 17, both left-hand (LH) and right-hand (RH) sides, as defined in the MSB".

While as we know, the bulk cargo door is located on the right side of the fuselage at section 16/17, there is no bulk cargo door on the left side, the wording "both left-hand (LH) and right-hand (RH) sides" in "The affected area" can cause ambiguity.

EASA response:

Comment agreed.

The "both left-hand (LH) and right-hand (RH) sides" was removed from the definition as the definition in the MSB is adequate enough. The affected part definition was adapted accordingly in response to this comment.

