

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-107

[Published on 21 July 2025 and officially closed for comments on 18 August 2025]

Commenter 1: AMAC Aerospace Switzerland AG – Pavol Sikula – 23/07/2025

Comment #1

We noticed that the P/N of the affected slotted nut in IPC is as follows: D5725018220000.

PAD 25-107 indicates the P/N of the affected nut as it is in Airbus AOT as P/N D57250182200.

We recommend to use in future AD the proper P/N as per IPC to avoid confusion or misleading AD assessment by industry.

PAD print screen:

Definitions:

For the purpose of this AD, the following definitions apply:

Affected part: Slotted nut having Part Number (P/N) D57250182200.

EASA response:

Comment not agreed.

The P/N mentioned in the AD is the basic P/N. The digits 13 and 14 of the P/N might be indicated as a technical specification number suffix. Those are considered equal to the affected part P/N. The IPC Airbus Part numbering system is explained in IPC Introduction Paragraph 8.

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

Commenter 2: Aegean Airlines S.A – Dimitrios Milanoski – 28/07/2025

Comment #2



The compliance time of the initial inspection is specified in Par. (1) – Table 1 of the PAD.

More specifically three conditions **A**, **B** or **C** define the inspection threshold and the operators shall comply to whichever of those conditions occurs later.

Namely, the above three conditions are defined as below:

A - 6 months after the effective date of this AD

B - 12 months after the last accomplishment of the Maintenance Planning Document (MPD) task ZL-415-01 or MPD task ZL-415-02, as applicable, for the pylon (LH or RH) having that affected part installed

C - 24 months after first installation of that affected part on an aeroplane.

Take for example an a/c that by the time of the AD's effective date is affected by condition **A** – initial inspection to be performed 6 month from the AD effective date.

In the way that Table 1 defines the three conditions, it is understood that in the scenario that the actions specified in either condition **B** or **C** will be accomplished amidst the effective date of the AD and the date 6 months after the effective date, i.e. condition **A** threshold, then, the initial inspection will swift from condition **A** to either **B** or **C** (whichever accomplished).

Kindly advise whether our understanding is correct or the initial inspection threshold definition shall be determined based on the evaluation of conditions **A**, **B** or **C** utilising a benchmark date, e.g. AD's effective date, operator's AD evaluation date etc. Of course, the condition **A** is already defined in accordance with a benchmark date, i.e. the effective date of the AD.

Last but not least, as similar threshold definitions could exist in other EASA ADs, kindly advise whether EASA has a universal rule to assess similar time requirements like conditions **B** and **C**.

EASA response:

Comment noted.

Under the condition “whichever occurs later”, the most advantageous / latest compliance time applicable to an aeroplane can be used.

Meaning, that if all possible conditions are applicable, the later one can be chosen.

In case that on the effective date not all compliance time options can be used, this does not hinder an accomplishment of, e.g. the MPD task, after the effective date of this AD. This would still enable to use compliance time B.

In summary, for this specific case, there is no “reference” date to be defined, as actions can also be accomplished after the effective date of the AD, allowing to use different compliance times.

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



Commenter 3: LATAM Airlines – Christian Vera – 31/07/2025**Comment #3**

LATAM Airlines consider that 6 months from the effective date of this AD is a short time to perform the initial inspection in a fleet of 300 airplanes. Could EASA consider 12 months for the initial inspection?

LATAM has inspected 13 aircraft (5% of our fleet) in accordance with AOT A57N025-25 and no sleeve migrated has been found. Also with MPD task ZL-415-01 or MPD task ZL-415-02, any sleeve migrated has been found.

In paragraph (5) Part Installation, is not permitted install an affected part to replace a serviceable part, so we understand that it could be installed an affected part to replace an affected part, in this case the initial inspection could be reset to 24 months in accordance with Table 1 compliance time C, is this correct?

EASA response:

Comment partially agreed.

For compliance time extensions, please contact your responsible NAA.

It is correct to assume, that an affected part can replace an affected part.

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

Commenter 4: GetJet Airlines – Kristupas Grikšas – 25/07/2025**Comment #4**

We are proposing EASA to reconsider mandated first inspection threshold based upon initial AOT inspection results. Related Airbus ISI documentation indicates that as of today no findings were reported on inspected aircraft as per AOT A57N025-25. Additionally, Airbus stated that expected finding rate is less than 1% and initial AOT inspection results correlate with the preliminary assessment. In the light of this and lack of concrete evidence for urgent fleet issue, GJT proposes EASA to review initial inspection threshold and extend it to additional year (total 18 months) to cover aircraft which completed their C-Checks few months prior issuance of the AOT. This will consequently relieve the burden on aircraft operators allowing for convenient maintenance opportunities to perform the task.

EASA response:

Comment noted.

For compliance time extensions, please contact your responsible NAA.

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

