

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-108

[Published on 22 July 2025 and officially closed for comments on 19 August 2025]

Commenter 1: Air New Zealand – Ben Whiting – 06/08/2025

Comment #1

- A. The compliance tables, Table 1, and Table 2 should be placed in the **Inspection(s)** section under paragraph (1) and paragraph (2) respectively to avoid confusion.
- B. Table 1 and Table 2 should also be clearer about what part they relate to. They are just labelled 'Table 1 – Compliance Time' and 'Table 2 – Compliance Time' so it is hard to figure out what the compliance times are for, even after reading paragraphs (1) and (2).
- C. Adding to the confusion, some of the thresholds say, for example: "... since last replacement of **that** door actuator fitting ...". The parts have been defined at the start of the AD as "Affected part 1" and "Affected part 2" so why not continue using these definitions throughout the AD instead of vaguely calling them 'that' part.

EASA response:

Comment partially agreed.

A&B: Both tables are listed directly above each other to allow easier comparison of both. EASA agrees to add in the title of each table to which paragraph/inspection they refer to.

C: The inspection requirements in paragraph (1) and (2) state "each" affected part 1 or 2, as applicable in the paragraphs. The Table 1 and Table 2 compliance times can be dependent on the last inspection or replacement of a fitting. This means that the compliance time for each fitting can be different. This is why the current wording including "that" is accurate.

In response to this comment the title of Table 1 and Table 2 were amended to include the paragraph they refer to.

Commenter 2: Delta Air Lines – Elijah Weinstein & Stephen Hill – 19/08/2025

Comment #2



Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-108, dated 22JUL25

(B) EASA Airworthiness Directive: No. 2024-0097R2, dated 12JUL24

Commenter Request

Modify Ref (A) PAD, Definition paragraph for “NEO aeroplanes”, to add A319-173N.

Request justification

Comparing differences between the Ref. (A) PAD and Ref. (B) AD, DAL noted the addition of A319-173N A/C to the applicability paragraph, however this fleet was not added to the NEO definition.

List paragraphs that change; describe (nonobvious) changes

Add A319-173N to the “NEO aeroplanes” definition.

EASA response:

Comment agreed.

In response to this comment the definition of the NEO aeroplanes were adapted to include the A319-173N.

Commenter 3: Pegasus Airlines – Mehmet Mert – 20/08/2025**Comment #3**

PAD 25-108 does not include any reporting requirement. However, in Revision 05 of SB 53-1325, Airbus added a new step to all inspections (e.g., TASK A320-A-53-XX-1325-01001-300A-A), stating:

"If there are findings, send a report to the responsible authority and to Airbus in accordance with the regulations, refer to AIRBUS Ref. OIT 999.0066/15 and Ref. ISI 00.00.00217."

In earlier revisions of this SB, there was no requirement to report findings to the authority. When we asked Airbus why this statement was included, they explained it relates to reporting serious structural damage (please see attached dossier). However, the wording “if there are findings” suggests that every finding, even minor scratches, must be reported to the authority. Even if there is no crack and damage can be repaired as per available data or drawing, SB asks to report this finding to the authority (please see below screen clip from the SB). As an operator, we consider this interpretation too strict and believe it creates an unnecessary operational burden.



We kindly request EASA's clarification on whether all findings under this SB and AD must be reported to the authority, and if so, we kindly ask a clear reporting requirement to be added directly into the AD.



b If no crack is found:

<1> Accomplish the MSB No. Ref. SB A320-53-1503.

<2> No further action for this Service Bulletin.

OR

<3> Do a DET for plain bush axial migration on the actuator fitting, refer to Ref. Fig.BI Check of the Plain Bush Migration, Flanged Bush Axial loose and Wear Marks LH Side.

<a> If the plain bush axial migration is found to be more than 0.80 mm (0.032 in.):

NOTE: Do not apply a repair before completing the 4 inspections, check if the repair is possible following the criteria included in the 3 RIs (R53370502; R53370506; R53370510).

Check according to RI Ref. R53370502 all sheets if the damage can be repaired within its limits.

[1] If the damage can be repaired within its limits according to RI Ref. R53370502 all sheets:

[a] Do the repair in accordance with Ref. Task A320-A-53-XX-1325-03ZZZ-920Z-A.

[b] If the damage is eliminated:

- Send the completed Inspection Report sheet in accordance with Ref. ISI 00.00.00179 and refer to Ref. Fig.RB Inspection Report Sheet.

NOTE: To send the Inspection Report sheet is not Required for Compliance (RC).

NOTE: If there are findings, send a report to the responsible authority and to AIRBUS in accordance with the regulations, refer to AIRBUS Ref. OIT 999.0066/15 and Ref. ISI 00.00.00217.

- Repeat the inspection in accordance with Ref. Task set A320-A-53-XX-1325-01ZZZ-93BZ-A, at the repetitive interval given in the PLANNING INFORMATION paragraph 1.E.(2).

[c] If the damage is not eliminated:



EASA response:

Comment noted.

The AD does not have any reporting requirement.

Airbus has decided to add this reporting requirement in the SB, to remind operators of their mandatory duties.

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

