

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-113

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Commenter 1: Hainan Airlines Aviation Technic – Xiaoping Luo – 11/08/2025

Comment # 1

Ref/A/:EASA PAD No.: 25-113, issued 28 JUL 2025

Ref/B/:Airbus AOT-A57L026-25 Rev 00, dated 03 JUL 2025

Ref/C/:Airbus AOT-A57L026-25 Rev 01, dated 04 AUG 2025

Ref/D/Maintenance Planning Document (MPD) ZL-521-01-1 INBOARD FIXED LEADING-EDGE STRUCTURE GENERAL VISUAL INSPECTION OF INBOARD FIXED LEADING-EDGE STRUCTURE

Ref/E/AMM TASK 27-84-61-960-801-A Replacement of the Slat 1 Seals

- A. HNAT recommends EASA to revise the words in Table 1- Compliance Time E of Ref/A/ EASA PAD from “Before exceeding 12 months, 400 FC or 2 600 FH, whichever occurs first, since last replacement of that sloping rib. ” to “Before exceeding 12 months, 400 FC or 2600 FH, whichever occurs first, since last **//concurrent replacement of sloping rib and slat 1 inboard seal (LH or RH Side)//**.” Because of the inspection of the sloping rib and slat 1 inboard seal can **//ONLY//** be postponed until 12 months, 400 FC or 2 600 FH(whichever occurs first) when the sloping rib and slat 1 inboard seal installed on the same side (LH or RH) are replaced concurrently as per Note 1 of Ref/A/ EASA PAD. And make the requirement of Compliance Time E consistent with the requirement of paragraph 5.1 ACCOMPLISHMENT TIMESCALE of Ref/C/ as well.
- B. As per the requirements of 5.1 ACCOMPLISHMENT TIMESCALE of Ref/B/ and Ref/C/, accomplish of MPD Ref/D/ or AMM Ref/E/ can be used as an alternative means of compliance for **//repetitive inspections//**. However, EASA does not make it crystal clear in Paragraph (5) Alternative Method of Compliance of Ref/A/ EASA PAD, HNAT thinks that the inspection should also be **//repetitive inspections//**. HNAT recommends EASA to clarify it in final published AD.

EASA response:

Comment 1A: Comment agreed. Final AD has been updated accordingly.



Comment 1B: Comment partially agreed. Only the instructions of the AMM task, or the MPD task, are acceptable alternative method to the instructions as identified in the AOT. Subsequent inspections must be accomplished with the compliance time (intervals) as specified in the AD.

