

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-121

[Published on 05 August 2025 and officially closed for comments on 02 September 2025]

### Commenter 1: FedEx Express – Brittany Govan Emory – 28/08/2025

#### Comment #1

1. The proposed Airworthiness Directive (AD) will be effective for sixty-eight FedEx Airbus A300-600 airplanes.
2. FedEx has reviewed the Ref /B/ ALS Part 2 Revision and has found no issues that would interfere with timely implementation of the required actions described in this PAD.
3. The new proposed AD should supersede Ref /C/ EASA AD 2024-0009 and Ref /D/ EASA AD 2024-0083, so that only one AD is tracking the requirements of Ref /B/ ALS Part 2 Revision. By having multiple ADs track to this ALS, it places an undo burden on airlines to track which repairs / alternative inspections correlate to which ADs. This is especially a huge burden on operators since Airbus does not list the applicable AD on their Repair and Design Approval Form (RDAF) and Technical Disposition (TD).

#### **EASA response:**

**Comment disagreed. This AD cannot supersede neither AD 2024-0009 nor AD 2024-0083. The mandated A300-600 ALS Part 2 Revision 4 Variation 4.2. contains only a dedicated task and does not include those tasks mandated by AD 2024-0009 and AD 2024-0083.**

**No changes have been made to the Final AD in response to this comment.**

### Commenter 2: UPS Airlines – Anthony Hosein – 02/09/2025

#### Comment #2

EASA provided advanced notification of potential AD action in EASA PAD 2025-121 (Time Limits / Maintenance Checks – Airworthiness Limitations Section – Part 2 / Damage Tolerant Airworthiness Limitation Items). The PAD proposes adoption of Airbus ALS Part 2, Variation 4.2 (Damage Tolerant Airworthiness Limitation Items) applicable to Airbus A300-600 airplane. This PAD addresses a potential unsafe condition caused by structural defects of the wing center flaps top skin and rib flanges between the tracks.



The proposal requires an x-ray inspection per ALI Inspection task 575306-01-1A, which is reduced from a threshold of 18000FC to 11000 FC and a reduction in the repeat interval from 6000 FC to 3000 FC. For aircraft that have exceeded the new thresholds or repeat intervals a grace period is provided for implementation of the new requirements into the Operators Maintenance Program. The grace period date is 06 July 2027.

ALI issue 11 (dated April 2006) had the threshold at 30000 FC and the repeat at 12500 FC. In ALS Part 2 variation (dated 05 September 2013), the threshold was reduced to 18000 FC and the repeat reduced to 6000 FC. ALS Part 2 revision 4, variation 4.2 further reduces the threshold to 11000 FC and the repeat to 3000 FC. This is an overall reduction of 19000 FC for the threshold and overall reduction of 9500 FC for the repeat. There has been no reasoning provided for any of the inspection interval reductions.

United Parcel Service Co. (UPS Airlines) fully supports accomplishing the ALI inspection and has already been accomplishing the inspections per Task 575306-01-1A. However, to meet the grace period compliance time, UPS proposes a 3-month extension to 06 October 2027 for completion of its fleet.

The A300 aircraft is designed to be damage-tolerant and can sustain small cracks and flaws without causing catastrophic failure, allowing for safe operation with existing damage until detected and repaired through scheduled inspections. The aircraft previously inspected by UPS had cracks which were repaired as part of the original maintenance program. The highest cycle aircraft that was safely flown with cracks had 17,500 cycles. The remaining UPS Airlines aircraft that need to be inspected all are currently less than 16,400 cycles and will be no more than 17,500 at the time of the requested extension of the grace period. Since these structural findings are driven by aircraft cycles, the additional 3 months requested will not result in an unsafe condition for the duration, since it has already been demonstrated that the aircraft can safely operate within limits of the original design requirements.

***EASA response:***

***Comment disagreed: The grace period in flight cycles (FC) has been defined by the Airbus Design Office based on the maximum likely expected yearly utilisation of the affected fleet. These values are established to ensure continued airworthiness and safety and cannot be modified for individual operators or specific cases.***

***EASA considers that the compliance timeline should remain as defined in ALS Part 2 Variation 4.2. The current grace period, ending 06 July 2027, reflects a balanced approach between operational flexibility and safety assurance.***

***No changes have been made to the Final AD in response to this comment.***

