

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-123

[Published on 08 August 2025 and officially closed for comments on 05 September 2025]

Commenter 1: Aer Lingus – Peter Furlong – 15/08/2025

Comment #1

During review of Airbus SB A330-32-3314 and EASA PAD 25-123, EIN would like to report the following observations.

There are a number of discrepancies between the Serial Numbers listed in the Airbus SB and the PAD issued by EASA.

Examples :

Serial number CE2024 is listed in SB A330-32-3314 and not listed in PAD 25-123.

See also serial numbers not highlighted in the PAD listing below which are not listed in the SB listing.

For Info: Serial Number CE84 is listed in PAD 25-123 and not in SB A330-32-3314 list and is fitted to EIN Aircraft.

Can you please review and comment please?



Affected part: Nose Landing Gear (NLG) retraction actuator having Part Number (P/N) D23352000-1, P/N D23352000-2, or P/N D23352000-3; and serial number CE19, CE23, CE28, CE30, CE60, CE65, CE84, CE120, CE124, CE135, CE175, CE221, CE258, CE265, CE285, CE291, CE332, CE340, CE358, CE429, CE439, CE479, CE584, CE592, CE609, CE639, CE663, CE690, CE712, CE727, CE733, CE779, CE805, CE807, CE827, CE835, CE838, CE841, CE854, CE856, CE875, CE878, CE882, CE908, CE909, CE927, CE933, CE946, CE2005, CE2015, CE2016, CE2019, CE2023, CE2026, CE2032, CE2040, CE2049, CE2056, CE2100, CE2112, CE2117, CE2120, CE2122, CE2134, CE2142, CE2143, CE2149, CE2160, CE2162, CE2169, CE2174, CE2182, CE2187, CE2200, CE2202, CE2214, CE2230, CE2253, CE2255, CE2256, CE2271, CE2273, CE2276, CE2280, CE2291, CE2297, CE2300, CE2308, CE2314, CE2335, CE2336, CE2361, CE2389, CE2405, CE2414, CE2415, CE2425, CE2437, CE2443, CE2464, CE2466, CE2478, CE2487, CE2532, CE2591, CE2596, CE2616, CE2652, CE2749, CE2757, CE2798, CE2866 or CE2957.



APPENDIX**A. LIST OF AFFECTED NLG RETRACTION ACTUATOR PN AND SN**

List of Affected NLG Retraction Actuator PN and SN

PN	SN	SN	SN	SN
D23352000-1	CE28	CE827	CE2100	CE2291
D23352000-2	CE30	CE838	CE2112	CE2300
D23352000-3	CE60	CE841	CE2117	CE2308
	CE65	CE854	CE2122	CE2314
	CE120	CE875	CE2134	CE2361
	CE124	CE878	CE2142	CE2389
	CE175	CE882	CE2143	CE2405
	CE221	CE908	CE2160	CE2414
	CE258	CE927	CE2162	CE2415
	CE285	CE933	CE2169	CE2425
	CE340	CE946	CE2174	CE2466
	CE358	CE2005	CE2200	CE2478
	CE429	CE2015	CE2202	CE2532
	CE439	CE2016	CE2214	CE2591
	CE584	CE2019	CE2230	CE2596
	CE592	CE2023	CE2253	CE2616
	CE609	CE2024	CE2273	CE2652
	CE690	CE2026	CE2276	CE2749
	CE712	CE2032	CE2280	CE2757
	CE779	CE2040	CE2255	CE2798
	CE805	CE2049	CE2256	CE2866
	CE807	CE2056	CE2271	CE2957

EASA response:**Comment noted.**

As a general principle, when discrepancies exist between an EASA AD applicability or requirements and the contents of technical associated documentation, the AD elements take precedence. However, this principle does not preclude to inform EASA about any existing discrepancies.

In the present AD, EASA confirm that operators must refer to the list of affected parts, as provided in the AD, which is based on updated information. The SB and VSB are expected to be updated accordingly.

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



Commenter 2: Deutsche Lufthansa AG – Steffen Widmer – 26/08/2025

Comment #2

The evaluation of the affected NLG retraction actuator showed SN CE2024 to be affected per SB 32-3314/ SB 32-4325 and VSB D23581-32-081 but not affected per PAD 25-123. Can you confirm SN CE2024 is no longer affected?

EASA response:

See EASA answer to comment #1

Commenter 3: Delta Air Lines – Brenna Dittmar and Stephen Hill – 05/09/2025

Comment #3

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 25-123, dated 08 Aug 25
- (B) Airbus Service Bulletin (SB) A330-32-3314, dated 17 Apr 25
- (C) Safran Landing System (SLS) Service Bulletin (SB) D23581-32-081 Rev 1, dated 01 Apr 25

Commenter Request

Add an Alternative Method paragraph allowing the use of maintenance records to identify the NLG retraction actuator Part Numbers (P/N) and Serial Numbers (S/N) to determine if part of the suspected population listed in Ref (A).

Request justification

Per Ref (A) and Ref (B), the only method to check part number and serial number is by physically inspecting the NLG retraction actuators. The affected parts are serialized rotatable parts that are tracked components and as such have detailed records of part serial numbers and installation location.

The Alternative Method of Inspection currently in the PAD allows that affected parts that have already been overhauled or repaired which would also be determined by maintenance records, therefore the serial number determination by records would meet the Inspection paragraph requirement.

Neither Ref (B) nor Ref (C) contain an option to examine maintenance records as a means of inspection for affected part serial numbers.



List paragraphs that change; describe (nonobvious) changes

Paragraph Required Action(s) and Compliance Time(s):

Add new Alternative Method paragraph

EASA response:

Comment not agreed. The AD does not require an inspection of each NLG retraction actuator, but only of the affected parts (i.e., those NLG retraction actuators having certain P/N and s/n). How an operator determines whether an NLG retraction actuator is an affected part is not regulated by the AD. Any method, including a review of maintenance records, can be used, provided it is acceptable to the NAA responsible for AD enforcement.

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

