

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-128

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Commenter 1: Delta Air Lines – James Thompson & Gabriel De Jesus Exclusa – 05/09/2025

Comment #1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-128, dated 19 AUG 25

(B) A350 ALS Part 4 Rev 7, dated 02 MAY 22

(C) A350 ALS Part 4 Rev 10, dated 01 JUL 25

Commenter Request

Delta would like clarification if tracking A350 ALS Part 4 Section 4-2 tasks (**to be controlled at aircraft system level**) 321100-00001-01E, 321100-00001-02E, and **new rev 10 task** can be tracked at the component level to better satisfy the intention of the tasks or would an AMOC be required?

Request justification

For example, A350 ALS Part 4 Rev 07 added tasks 321100-00001-01E and 321100-00001-02E, which requires operators to "Discard the bolts and the nuts of the lockstay actuator brackets every time they are removed from the upper side stay and not later than 6,470 FC (for aircraft A350-900 PRE 111136 PRE 116947)/6,000 FC (For aircraft A350-900 POST 111136) since their installation. These tasks are located in Section 4-2, which are to be controlled at the aircraft system level as defined in the ALS Part 4 **Section 1**, whereas Section 4-1 tasks are to be controlled at component/subassembly level.

If the Main Landing Gear's (MLG) upper side stay is moved from one aircraft to another aircraft (i.e. MLG removed for overhaul and reinstalled on another aircraft or removed serviceable to replace another aircraft's unserviceable unit), the tasks will be tracking the time accrued on the newly-installed aircraft and not the upper side stay, which previously accrued time on the originally installed aircraft. Therefore, the tasks will not be tracking the tasks' intention.

For the reasons described above, Delta has requested Airbus to revise A350 ALS Part 4 to move tasks 321100-00001-01E, 321100-00001-02E and **new rev 10 task** from A350 ALS Part 4 Section 4-2 to A350 ALS Part 4 Section 4-1 (to be controlled at component/sub-assembly level) to allow tracking the tasks at the component level to account for potential movement of the components between aircraft and better satisfy the intention of the tasks.



EASA response:

Comment noted. EASA AD requires compliance with the actions as they are specified in the Airbus A350 ALS Part 4 Revision 10. For any questions concerning the technical content of the requirements in the ALS, please contact Airbus.

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

