

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-133

[Published on 21 August 2025 and officially closed for comments on 18 September 2025]

Commenter 1: Elbe Flugzeugwerke GmbH – Ulf Meinhardt – 05/09/2025

Comment #1

Background:

The PAD is stating that reports were received of broken bolts related to seat rail connections in the area of frame (FR) 47 (for A320 and A321 aeroplanes), FR47/51 (for A319 aeroplanes), FR47/54 (for A318 aeroplanes), FR35 (for A318, A319 and A320 aeroplanes) and FR35.8 (for A321 aeroplanes). This condition, if not corrected, would lead to seat detachment and passengers injuries under emergency landing loads.

Request:

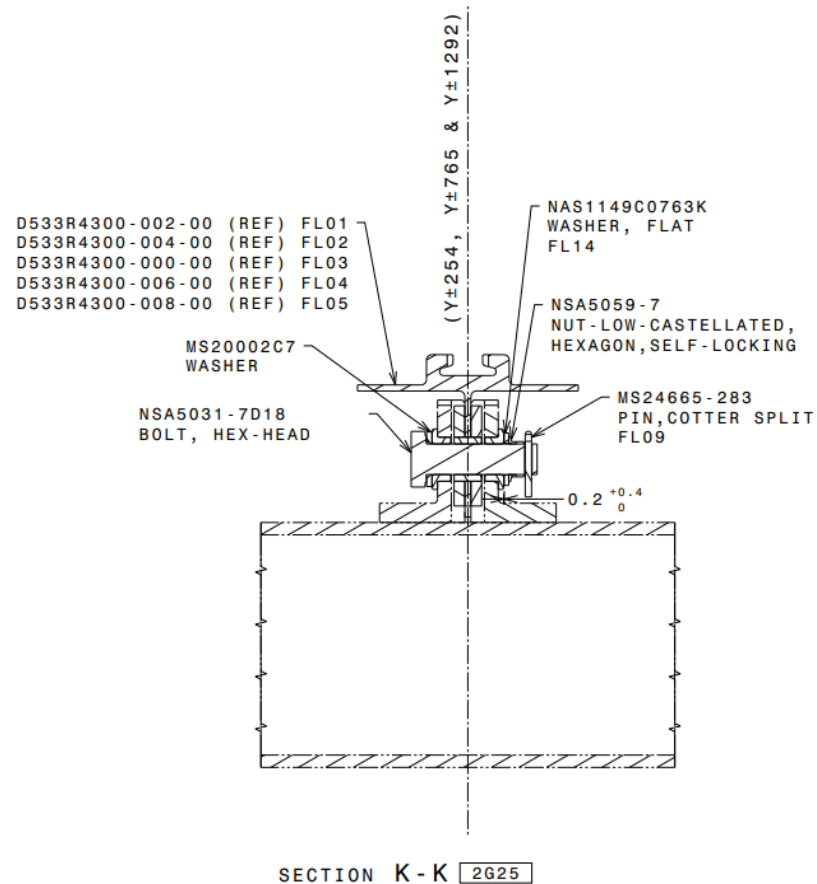
EFW kindly requests to limit the upcoming AD to all MSNs which are not converted to freighters in accordance with the EFW STC No. 10063798.

Rationale:

One main features of an A320P2F / A321P2F aircraft is the conversion of the main cabin to a Class E Cargo Compartment (refer to STCDS 10071994 – chapter III. Technical Characteristics and Operational Limitations). Consequentially neither seats are installed in section 15 of the aircraft nor passengers present in the Class E Compartment during emergency conditions. Furthermore a RCB is installed, preventing any object to penetrate from the cargo compartment into the courier area during emergency landing conditions.

In addition, the reinforcement of Main Deck Cargo Compartment floor structure (refer to STCDS 10071994 – chapter III.) already includes the replacement of the nylon bushes in section 15 by copper and steel bushes (ref. P2F conversion drawing F533R1723 – excerpt attached hereunder).





As a consequence, the problem as describe in the PAD will not exist for P2F converted aircraft.

EASA response:

Comment noted.

This request will need an AMOC approval, as technical investigations have to be completed.

Please find under this [link](#), the FAQ for AMOC, including an answer to the question: “What is an Alternative Method of Compliance (AMOC) to an Airworthiness Directive (AD)?”. In that answer, typical cases for which an AMOC is necessary are shown.

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



