

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-135

[Published on 01 September 2025 and officially closed for comments on 29 September 2025]

Commenter 1: FedEx – Justin Shaw –24/09/2025

Comment # 1

References:

- /A/ EASA PAD 25-135, Issue date 01 September 2025
- /B/ Airbus SB A300-53-6177 revision 2 dated 18 July 2025
- /C/ Airbus SB A300-53-6177 revision 1 dated 06 July 2018
- /D/ Airbus SB A300-53-6111 any revisions
- /E/ EASA AD 2015-017 dated 30 October 2015

1. The proposed Airworthiness Directive (AD) will be effective for sixty eight (68) A300-600 model airplanes operated by FedEx.
2. FedEx has determined that the additional inspection grace periods for Configuration 2 and 3 in Ref /B/ will not fit our planned scheduled maintenance checks. FedEx would like to request EASA to consider extending the grace period of additional inspections for Configurations 2 and 3 in Ref /B/ paragraph 1.E to 30 months starting from accomplishment of Ref /C/ inspections. This will help FedEx align the new SB with additional inspections on every aircraft scheduled for heavy maintenance checks and avoid commercial interruptions.
3. The new proposed AD Ref /A/ supersedes Ref /E/ with additional work for configuration 4 to determine whether any frame foot is repaired with any RDAS instructions within 12 mos. FedEx would like EASA to consider that all RDAS repairs deviating from Ref /C/ and /D/ should be acceptable since Airbus approved those repair deviations. Airbus must be responsible for reviewing all their RDAS repair records rather than operators re-evaluating and reporting it back to them.
4. FedEx requests all previous RDAS/RDAF/TD approvals to the Ref /E/ AD be AMOC approved to the new AD.

EASA response:

1. Comment noted.

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



2. Comment disagreed. The compliance time has been defined by the Airbus Design Office based on the risk assessment taken into account the acceptable airworthiness risk level. The established compliance time ensures continued airworthiness and safety of the fleet and cannot be modified for individual operators or specific cases. Individual cases requiring deviation from the defined compliance time may be addressed through an Acceptable Method of Compliance (AMOC) issued by the competent authority, such as EASA or the competent authority of the affected operator. Operators facing scheduling constraints or operational limitations are advised to submit a formal AMOC request with appropriate technical justification and risk assessment. This process allows the competent authority to evaluate the specific circumstances and determine whether an alternative compliance method can be approved without compromising safety.

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

3. Comment disagreed. EASA acknowledges the commenter's position regarding RDAS repairs deviating from Ref /C/ and /D/, and the expectation that Airbus should maintain oversight of such deviations. However, as Airbus does not hold an up-to-date record of the operational status of individual aircraft (i.e. in-service versus withdrawn/scrapped), it remains the responsibility of the operator to identify and report the applicable RDAS repairs on their currently flying aircraft. Operators are expected to review the list of RDAF applied to their fleet and liaise with Airbus where necessary to confirm the acceptability of any deviations from Ref /C/ and /D/. This approach ensures continued airworthiness oversight while recognizing the limitations in centralized repair tracking.

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

4. Comment disagreed: Airbus has not confirmed all previously approved RDAS/RDAF/TD repairs under AD 2015-0217 as Alternative means of compliance (AMOC) to the new AD consulted as PAD 24-135. The new AD introduces additional requirements for CONF 004 aeroplanes, specifically the determination of whether any frame foot has been repaired in accordance with RDAS/RDAF/TD instructions, and the reporting of such findings to Airbus. This process is essential to ensure continued structural integrity and alignment with the safety objectives of SB A300-53-6177 as referenced in paragraph (4) of the AD. Given that Airbus does not maintain an up-to-date record of the operational status of individual aircraft, it remains the operator's responsibility to identify applicable RDAS/RDAF/TD repairs on their in-service aircraft and engage Airbus for assessment. Airbus must evaluate, on a case-by-case basis, whether any previously approved RDAS/RDAF/TD provides an equivalent level of safety to SB A300-53-6177.

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

