

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-140

[Published on 10 September 2025 and officially closed for comments on 24 September 2025]

Commenter 1: Singapore Airlines Limited – Soh Kian Ann – 15/09/2025

Comment #1

Paragraph (5) of PAD does not allow affected part having P/N 700TS06YXX or 700TS06YXXX (where 'XX' or 'XXX' represents any numerical sequence), having a s/n listed in Appendix 1 of this AD to be installed on any aeroplane.

The definition of affected part is defined as having PN 700TS06Y, 700TS06Y10, 700TS06Y11, 700TS06Y111, 700TS06Y12, 330TS08Y, 335TS08Y00 or P/N 335TS08Y01 **which includes all SN except those which have been inspected, repaired (if applicable) and reidentified in accordance with the instructions of the VSB, as defined in this AD.** This can be interpreted that P/N 700TS06YXX or 700TS06YXXX (where 'XX' or 'XXX' represents any numerical sequence), having a s/n listed in Appendix 1 of this AD which have been inspected, repaired and reidentified in accordance with VSB is considered as serviceable part and can be installed on aircraft. However, the definition conflicts with the requirement of Paragraph (5) of the AD. Can EASA clarify the definition of the affected part.

Parts Installation:

- (4) For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install, (see Note 3 of this AD), unless otherwise required by paragraph (5) of this AD, an affected part on any aeroplane provided that, before installation, it passed an inspection (no damage found) in accordance with the instructions of the SB.
- (5) For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is not allowed to install (see Note 3 of this AD) an affected part having P/N 700TS06YXX or 700TS06YXXX (where 'XX' or 'XXX' represents any numerical sequence), having a s/n listed in Appendix 1 of this AD on any aeroplane.

Note 3: Removal of an affected part from an aeroplane and subsequent reinstallation of that affected part on the same aeroplane, accomplished during a single maintenance visit, is not considered as 'install' as specified in paragraph (3) of this AD.



Affected part: Fire panels having Part Number (P/N) 700TS06Y, 700TS06Y10, 700TS06Y11, 700TS06Y111, 700TS06Y12, 330TS08Y, 335TS08Y00 or P/N 335TS08Y01, except those which have been inspected, repaired (if applicable) and reidentified in accordance with the instructions of the VSB, as defined in this AD.

EASA response:

Comment not agreed. It is confirmed that there is no repair for P/N 700TS06YXX or 700TS06YXXX (where 'XX' or 'XXX' represents any numerical sequence), having a s/n listed in Appendix 1 found with damage therefore in that case they cannot become serviceable.

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

Commenter 2: Air France – Alain Thomas – 12/09/2025

Comment #2

Regarding EASA_PAD_25-140_1.pdf, I would like more information about P/N 700TS06Y11 listed in Appendix 1 table page 5/5

For Air France A320 Family Aircraft, PN 700TS06Y11 is unknown in AIB IPC but PN 700TS06Y111 is well known and on identification plates of ENG/APU FIRE PANEL 1WD installed on some AFR aircrafts.

May be it's just a typo error or it's an old PN that's no longer installed on our A320FAM fleet?

If it's a typo error PAD should be corrected to be in accordance with AIB IPC.

EASA response:

Comment noted. All listed PNs have been certified for the installation on A320 FAM fleet. The appendix provides for information the PN at time of delivery. AD paragraph 1 requires an action on the identified affected SN independent to the PN.

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

Commenter 3: Interglobe Aviation Limited (INDIGO) – Ashwin KOLHATKAR – 11/09/2025

Comment #3



Paragraph (4)

The restriction on Installation of an affected part unless it is inspected as per the Airbus SB, vide Para 4 of the PAD is unwarranted as the AMM Task (26-12-12-400-001) for installation of the fire panel already has a very specific “Warning” (see snippet below) mentioning that a panel showing signs of an impact must not be installed. This, in our view, provides the required safeguard in preventing a damaged unit from being installed. Putting restriction on part installation with reference to SB as in Para 4 will only result in duplication of work without any additional safety.

Instead, we suggest that PARA (4) should read as under:

For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is not allowed to install (see Note 3 of this AD) an affected part having P/N 330TS series or 335TS series, having a s/n listed in Appendix 1 of this AD on any aeroplane unless it has been, inspected, repaired (if applicable) and reidentified in accordance with the instructions of the VSB, as defined in this AD

Snippet from current AMM for reference:

4. [Procedure](#)

SUBTASK 26-12-12-420-050-B

WARNING: IF A FIRE PANEL SHOWS SIGNS OF IMPACT (A BENT CASING OR A CRACKED FRONT FACE, FOR EXAMPLE), DO NOT INSTALL IT ON THE AIRCRAFT AND SEND IT TO THE SHOP. INSTALLATION OF A DAMAGED FIRE PANEL CAN CAUSE THE ABNORMAL OPERATION OF THE FIRE PUSHBUTTON SWITCHES.

EASA response:**Comment noted.**

Indeed it is intended that the inspection is performed in accordance with the SB, as the requirement of paragraph (4) of the AD specifically refers to affected parts. It is confirmed that current AMM instructions are not equivalent to the mandated SB instructions.

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

Commenter 4: Air New Zealand Group – Eddy Rajkumar – 17/09/2025

Comment #4

Air NZ's feedback pertains to the definition of “Affected Part” as outlined in the PAD. We note that the re-identification requirement in accordance with the VSB instructs operators to “*apply a black dot in the Serial Number block of the identification label with a paint marker.*”

Air NZ has concerns that this method may not provide a sufficiently reliable means of re-identification. Specifically, a paint marker can be unintentionally removed (e.g. through wear or cleaning), or conversely, a smudge or mark in the serial number block could be misinterpreted as a



compliant post-mod identifier. As the definition of an Affected Part is based on reidentification per the VSB, the current marking method plays a key role in demonstrating compliance with Paragraph (4) of the PAD.

Air NZ anticipates a high volume of part removals because of the inspection criteria and associated risk. Hence Air NZ expects to receipt several Fire Panels to support potential replacements, all of which will require verification against the re-identification criteria defined in the VSB to determine their status as **Affected Part** for fitment.

We understand this is not an issue pertaining to EASA. Air NZ has raised the issue with Safran and their response is currently pending. We expect Safran to revise the VSB to provide a more verifiable re-identification method. In the event of a VSB revision after the AD is issued, and if the PAD's definition remains unchanged, we agree that no further change to the AD would be necessary.

EASA response:

Comment noted. Such identification is considered acceptable by Airbus and EASA at the current stage. Any later revisions of the VSB are acceptable.

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

Commenter 5: Lufthansa German Airlines – Stephan Dunkel – 18/09/2025

Comment #5

I have a comment on issued PAD 25-140 with referenced SB A320-26-1137/1138.

The PAD has “Group 1” and “Group 2” aircrafts defined in the definition section.

The new SB Revision 2, dated 11Sep2025, of the referenced SB A320-26-1137/1138 has defined a “Group A” and a “Group B”.

This will lead to confusion while performing the inspection due to group name inconsistencies.

Is it possible to be more consistent in defining the groups names? This would be easier to implement the upcoming AD by performing the referenced SB's.

EASA response:

Comment not agreed. The numerical definition of Groups is a standard for ADs in EASA. The definition of the groups defined in AD and SB are not strictly identical.

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



Commenter 6: Pegasus Airlines – Özkan Neşeli – 22/09/2025**Comment #6****A. Definition of “Damage” and Inspection Criteria**

The PAD requires inspection of affected fire panels not listed in Appendix 1. However, the Airbus SB does not clearly define the damage criteria that would consider a part “unserviceable.”

- Could EASA clarify which findings (e.g. minor scratches, paint peelings, small dents) should be considered as damage requiring removal and shop inspection?
- Is there a threshold for acceptable cosmetic findings to avoid unnecessary removals?

B. Compliance Timeframes and Supply Chain Considerations

The PAD mandates replacement of Appendix 1 listed SNs within 6 months and replacement within 2 months after damage is found. There is a significant risk that simultaneous replacement demands from multiple operators will create market shortages and limited shop capacity.

- Would EASA consider extending in the compliance times to mitigate the risk of shortages and ensure operators can maintain safe and continuous operations?

C. Appendix 1 Serial Number List – Basis of Selection

Appendix 1 identifies a subset of SNs requiring mandatory replacement.

- Could EASA clarify the selection methodology for this list? Were these SNs identified through OEM production quality records (e.g. potential drops or shocks during assembly) or based on field reports and shop findings?
- Will this list remain static in the final AD, or is it expected to be updated if Safran’s ongoing investigations identify additional SNs?

D. Marking / Re-Identification of Inspected Units

According to Safran VSB instructions, fire panels that have been inspected and/or repaired in shop are re-identified by applying a black dot in the Serial Number block of the identification label (using paint marker type EDDING 780).

- However, PAD 25-140 and the associated Airbus SBs do not specify any re-identification or marking for units inspected on-wing (with no damage found).
- Would EASA consider introducing a consistent marking or re-identification requirement also for on-wing inspected units, to ensure traceability and to avoid repeated removals or ambiguity during audits?

EASA response:

A: The SB at Revision 02 was issued to clarify the criteria. The SB at Revision 02 is required by the final AD. The AD has been updated accordingly.

B: Comment agreed. The compliance time in the final AD was updated.

C: The appendix 1 SN list has been established by Safran for units with evident damage observed by the OEM after shop inspection

After the publication of the PAD, no change to the affected parts has been made. The PAD and AD affected parts are unchanged. Changes in the future could occur, based on further investigation. Accordingly an update (supersedure or revision) of the AD will be published.

D: The marking is not required to fulfill the mandatory requirement as per the current AD. Reindentification is requested for parts listed in Safran VSB.

Commenter 7: Lufthansa Technik AG – Roman Klein – 22/09/2025

PAD 25-140 covers the topic INSPECTION OF POTENTIALLY DAMAGED FIRE SWITCHES FROM THE FIRE PANEL 1WD.

This is addressed in Airbus SBs A320-26-1137 and A320-26-1137 which the PAD refers to with initial issue or Rev 01.

However, after the PAD issue date, Airbus published Rev 02 of both SBs. They contain additional work with respect to SBs Rev 01.

My request:

Please confirm that in the upcoming EASA AD those SB revisions 02 will be acceptable for compliance.

EASA response:

Please refer to the answer provided to comment #6A.

