

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-146

[Published on 16 September 2025 and officially closed for comments on 14 October 2025]

Commenter 1: easyJet Plc – Jim Neeson – 24/09/2025

Comment #1

Can Airbus clarify that this PAD is only for aircraft where in-service mods SB A320-57-1089 up to Revision 3 and A320-57-1100 up to Revision 3 have been embodied, and does not include those aircraft where production mod 24591 has been embodied?

EASA response:

Comment partially agreed.

The AD is applicable to all A320 and A321 models (see applicability of the AD), except those which have mod 24591 embodied in production or SB A320-57-1089 Revision 04 in service (for A320 aeroplanes) and except those that have mod 24977 embodied in production (for A321 aeroplanes). Therefore the applicability does not depend on the embodiment status of SB A320-57-1100 (to be noted that there is (at the time of publication of this AD) no more A321 pre MSB in service). This AD restates partially AD 2014-0169 and mandates SB 57-1089 at Revision 04 and requires additional inspection as per SB 57-1256 for A320 MSN having embodied SB 57-1089 at lower revision 04 and all A321 whatever SB 57-1100 revision. No change has been made to the final AD in response to this comment.

Commenter 2: Deutsche Lufthansa AG – Florian Schmucker – 08/10/2025

Comment #2

As per PAD Definition the following Groups are defined:

Group 1 aeroplanes are A321 aeroplanes, which are not Group 2 aeroplanes.

Group 2 aeroplanes are A321 aeroplanes having MSN 364 or MSN 385.

Group 3 aeroplanes are A320 aeroplanes on which, before the effective date of this AD, Airbus SB A320-57-1089 has not been embodied.



Group 4 aeroplanes are A320 aeroplanes which are not Group 3.

For DLH A320-211 MSN 401 D-AIQS SB A320-57-1089 R01 was embodied in 2002. So, D-AIQS MSN 401 must be defined as a Group 4 aeroplane.

Now, in Para. (8) Inspection(s) of section “New requirements of this AD” the following is defined:

“(8) For A321 aeroplanes having SB A320-57-1100 at any revisions embodied and Group 3 aeroplanes having SB A320-57-1089 up to Revision 03 (included) embodied: Within 24 months after the effective date of this AD, accomplish the DET inspection on the affected parts, in accordance with the instructions of the SB.”

As we understood this definition, the one-time detailed inspection as per SB A320-57-1256 is not applicable for Group 4 aeroplanes. But in the corresponding SB A320-57-1256 MSN 401 is applicable for this inspection.

Therefore, DLH requests EASA to revise paragraph (8), so that Group 4 aeroplanes are also included in the inspection and thus comply with SB Applicability.

EASA response:

Comments agreed. The typographical error in the PAD was corrected in the final AD accordingly.

Commenter 3: Delta Air Lines, Inc. – Brenna Dittmar & Cecilia Teeuwen – 14/10/2025

Comment #3

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-146, dated 16 Sep 2025

(B) Airbus Service Bulletin A320-57-1089, up to Revision 03

Commenter Request

Modify Ref (A) PAD, Inspection(s) paragraph (8), to change “Group 3” to “Group 4”.

Request justification

As given in Ref (A) Definitions paragraph, Group 3 aeroplanes have not had Ref (B) embodied, so the statement in paragraph (8) for Group 3 aeroplanes is contradictory. DAL believes it should say “Group 4”.

List paragraphs that change; describe (nonobvious) changes

Inspection(s):



(8) For A321 aeroplanes having SB A320-57-1100 at any revisions embodied and Group 4 aeroplanes having SB A320-57-1089 up to Revision 03 (included) embodied: Within 24 months after the effective date of this AD, accomplish the DET inspection on the affected parts, in accordance with the instructions of the SB.

EASA response:

Comment agreed. The Paragraph (8) was updated accordingly. Refer also to comment #2.

