

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-149

[Published on 19 September 2025 and officially closed for comments on 17 October 2025]

Commenter 1: American Airlines – Amanda Dombecki – 16/10/2025

Comment #1

- A. In Airbus SB A320-25-1CHZ Aries OHSC P/N Appendix and EASA PAD 25-149 Appendix 1, the P/Ns have the letter O in the 4th place in the P/N, but in all Airbus Illustrated Parts Catalog Manuals the 4th place contains a zero "0". This means that if the P/Ns in the appendices are copied and searched in the manuals, no search results will appear.

American Airlines has informed Airbus of this issue, and Airbus has replied that per 'Part Number' ATA2200 (ATA2000) Mod 2018 page 6-913 Chapter 6-2-2, "For compatibility purposes with many years of previous requirements and for human factors reasons, it is recommended that the following rules of part number construction are followed: 1. Do not use alpha "O" - use zero "0". Because of this, Airbus states that the alphabet "O" is automatically updated to numerical '0' in the Airbus tool.

There is a possibility for Airbus to add a True Part Number with the letter "O" in the IPC description of these parts in the Airbus tool, but Airbus has not indicated that this will occur. Therefore, American Airlines is concerned that the differences in part numbers will cause airlines to believe incorrectly that no affected parts are installed on their aircraft.

American Airlines proposes the EASA PAD 25-149 be updated to show the affected P/Ns with the letter "O" as well as how those P/Ns appear currently in the Airbus manuals with the number "0" to prevent part numbers from being inadvertently missed by airlines when investigating if parts are installed.

- B. In Airbus SB A320-25-1CHZ Aries OHSC P/N Appendix and EASA PAD 25-149 Appendix 1, some P/N ranges are listed twice (ex: ARCO7912XXXX, ARCO7916XXXX, and ARCO7917XXXX should already include ARCO79125XXX, ARCO79165XXX, and ARCO79175XXX, respectively, but both are listed in the appendix).

American Airlines proposes that the appendices be revised to remove P/N ranges which are already included in other P/N ranges listed.

- C. In Airbus SB A320-25-1CHZ Aries OHSC P/N Appendix and EASA PAD 25-149 Appendix 1, the P/Ns listed are only ranges and do not include actual MPNs (ex. ARCO7912XXXX). However, it is helpful to American Airlines to have a full list of effective part numbers so that measures can be taken to ensure proper inspection and handling of components for future configurations.

American Airlines proposes that all known part numbers affected be listed in the appendix in addition to or instead of the P/N ranges listed.



D. The EASA PAD 25-149 defines a Serviceable part as an OHSC eligible for installation in accordance with Airbus instructions, that is not an affected part.

American Airlines requests that EASA clarify if the serviceable part may be installed via Airbus instructions other than SB A320-25-1CHZ (ex. IPC or other SB installing new, unaffected overhead bins)

EASA response:

A: Comment agreed. The Affected part definition was updated to inform about this situation.

B: Comment agreed. The P/N list of appendix 1 has been modified.

C: Comment noted. The current EASA AD is seen as adequate, listing all part numbers could induce errors, which would not be beneficial. Airbus might take this into account during the next SB revision.

D: Comment noted. EASA confirms that serviceable parts can be installed with other approved instructions than the SB.

Commenter 2: United Airlines – Elliot Taylor – 13/10/2025

Comment #2

References:

A. EASA PAD 25-149

B. Airbus Service Bulletin (SB): A320-25-1CHZ

United Airlines (UAL) has reviewed reference A, Notice of Proposal to issue an Airworthiness Directive, and provides the below comments regarding the contents and proposed actions listed in reference B for UAL's effective aircraft.

1) Service Bulletin/Compliance Documents

- a) United have reviewed the work required regarding the procedures or requirements.
- b) United has opened a tech request with Airbus requesting clarification on repair procedures that would be required if the conditions of allowable tolerance within the SB are not met, as there is no mention of this (time, labor, parts, etc.) in the SB.
 - i) Airbus has advised that doublers of a larger size, or full replacement of bin or sidewalls may be required. United must submit dedicated tech requests for each instance repair where this may be required, greatly impacting the amount of time required for these inspections.

2) Timeline

- a) United observes the anticipated requirement of completion within 24 months of AD issuance. This will be in work ahead of the AD release.



- b) United estimates approximately 16 hours for inspections, achievable only during base holds typical for heavy maintenance. This may be extended due to the severity of needed repairs found. United plans to achieve these inspections at regular interval scheduled holds, however, some A/C will require special holds to complete within the timeline, which are costly and take A/C out of service.

EASA response:

Comment noted.

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

