

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-154

[Published on 30 September 2025 and officially closed for comments on 28 October 2025]

Commenter 1: STARFLYER Inc. – Go Takeda – 06/10/2025

Comment #1

AOT A32N037-25 Rev00 typo is covered by ISI 32.21.00097 (Airbus Document).

We would like this AD to also incorporate the content of ISI 32.21.00097.

EASA response:

Comment noted. A reference to the ISI was added in the definition of the AOT in the AD. This offers the usage of it together with the AOT.

Commenter 2: Jetstar Japan Co., Ltd. – Hiroaki Fujita – 07/10/2025

Comment #2

RC (1) required to perform SDI with compliance depending on CSN on effective date of the AD which is TBD.

On the other hand, AOT required to confirm CSN on 09SEP2025.

In this case, if CSN of the unit is 11990 on 09SEP2025 but effective date of the AD is exceed 12,000FC, we should perform the inspection with reduce compliance time around 2 or 3 months.

It has a huge impact for our planning to perform the inspection.

Could you please advise us count start timing of RC (1) can be changed from effective date of the AD to effective date of the AOT?

EASA response:

Comment not agreed. The standard for an EASA AD compliance time is the effective date of the AD, not the TCH publication.

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



Commenter 3: Spring Airlines – Yu QianCheng – 16/10/2025

Comment #3

Referring to AOT A32N037-25, Spring Airlines has two affected NLG sliding tubes, CSN(Cycles Since New) 11843FC/11777FC, counted from the effectivity date of this AOT, the compliance time is within 8 months.

When referring to PAD 25-154, Flight Cycles (FC) accumulated by the affected part since new on the effective date of this AD, the CSN will exceed 12000 FC and the compliance time will be changed from 8 months to 4 months. Due to OEM does not have sufficient spare parts, it will have a significant impact on the operation.

Can the CSN requirements in PAD 25-154 be the same as those in AOT A32N037-25?

EASA response:

See the answer to comment 2.

Commenter 4: All Nippon Airways Co., Ltd – Koshiro Matsui – 22/10/2025

Comment #4

There are some typos in the AOT and Airbus informed operator the correction in ISI 32.21.00097 as below.

"QUOTE"

Airbus would like also to inform the operators of the following typos in the AOT [Ref 1]:

Page 1 of 27, Reference 5, and page 7 of 27, PMS 01-06-12 "Marking with Indelible Ink": The document number is correct, but there is a typo in the AOT. The PMS 01-06-12 is an Airbus document, not a Safran document. PMS 01-06-12 "Marking with Indelible Ink" is available via Airnav, on Airbus portal.

Page 19 of 27, EQUIPMENT, G) Artificial flaw/flux indicators (AS 5731): There is a typo in the AOT. The correct reference for the international standard for use of notched shims in magnetic particle inspection is AS 5371 and not AS 5731.

Note: The above typos have well been noted and Airbus will take them into consideration for possible update in the AOT should a revision of the AOT be required in the future. In the meantime, operators can refer to the clarification given in this ISI for application of the AOT [Ref 1].



"UNQUOTE"

Therefore, our comment is here.

If the AOT is not revised before the EASA AD is released, we would like EASA to reflect the correction described in ISI 32.21.00097 to the coming EASA AD.

If the AOT is revised with the correction before the EASA AD is released, we would like EASA to call the revised AOT in the coming EASA AD.

In addition, we believe there is no reporting requirement in this PAD/EASA AD.

EASA response:

See answer to comment #1. Concerning reporting, your understatnding is correct no reporting is required by this AD.

