

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-157

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

Commenter 1: Delta Air Lines, Inc. – Clara Mastrion & Michael D. Tharp – 21/10/2025

Comment #1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 25-157, dated 10 Oct 25

(B) Airbus AOT A53P019-25 Rev 00, dated 01 Sep 25

Commenter Request

Remove “or damage” from Required Action(s) and ComplianceTime(s) para. (2) to reduce vagueness.

Request justification

The inspection outlined in Ref (A) PAD must be accomplished “in accordance with” Ref (B) AOT. The intent of Ref (B) AOT is to identify fatigue-driven cracks and sheared fasteners that may result from repeated opening and closing of doors. During the AOT comment period, the draft AOT had included the phrase “or any other damage”, which Delta requested to remove due to its ambiguity and potential to encompass unrelated issues. Airbus agreed to remove this phrase to ensure the AOT remains in the scope of the defined unsafe condition. For consistency, Delta requests that EASA also remove this phrase.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s):

- Remove “or damage” from paragraph (2).

EASA response:

Comment not agreed. The AD requires to inspect the affected areas and the TPS. The affected areas must be inspected for cracks, the word “damage” is used in relation to the condition of the TPS layer.

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



Commenter 2: Cathay Pacific Airways Limited – Kathy Chin – 23/10/2025
Comment #2

- A. The PAD requires operators to perform an initial inspection within a short compliance timeframe. For CPA fleet, we need to complete inspections on 37 aircraft within 3 months after the AD's effective date.

Given the expected moderate finding rate, the lack of advance spare parts and tooling from Airbus, additional shipment time (~2 days), and long repair durations (maximum estimated elapsed time of 57 hours for replacing 2 brackets), it is anticipated that our entire fleet may be grounded within this 3-month period.

Therefore, CPA strongly recommends extending the compliance time to 1 year after the AD's effective date for items E) and H) in Paragraph (1). This extension would allow operators to better plan ground slots and facility availability for inspection and repair.

- B. Since AOT A53P019-25 Rev 00 has already been issued, CPA expects that its accomplishment prior to the AD's effective date should be considered as meeting AD compliance. However, this credit is not currently mentioned in the PAD.

EASA response:

A. Comment not agreed. Available data does not support a general extension of the compliance time as proposed. To obtain an individual (temporary) exemptions on AD compliance time in the event of unforeseen urgent operational circumstances or operational needs of a limited duration, the State of Registry authority should be contacted.

B. Comment not agreed. The AD specifies that the actions required must be performed, unless they have been already accomplished.

No changes have been made to the Final AD in response to those comments.

Commenter 3: Cathay Pacific Airways Limited – Kathy Chin – 23/10/2025
Comment #3

In TFU 53.21.00018, it states that **“In order to comply with the AOT A53P019-25 requirements, the FWD & AFT CDS inspections must be accomplished during the same maintenance opportunity before the next flight [inspections Para 5.4 and instructions Para 5.5 are tagged (RC = Required for Compliance) in the AOT]. Hence, a partial embodiment of this AOT is NOT allowed”**

However, in the PAD, it appears that operators may separate the accomplishment of FWD CDS and AFT CDS, as they have different compliance time.



Could EASA please clarify whether operators are permitted to carry out the inspections of FWD CDS and AFT CDS separately in different maintenance opportunity, provided that each is completed within the respective compliance time stated in Table 1?

If operators are unable to do so—for example, if the FWD CDS has a later due date than the AFT CDS according to Table 1—can both inspections be accomplished on the later due date?

Attached the TFU FYR.

EASA response:

Comment agreed. It has been confirmed that both affected areas (FWD and AFT CDS) have to be inspected at the same time/during the same maintenance intervention. The Final AD has been amended and adapted, specifying just one compliance time as relevant for both FWD and AFT CDSs.

