

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-159

[Published on 17 October 2025 and officially closed for comments on 14 November 2025]

Commenter 1: All Nippon Airways Co., Ltd. – Osamu Takeda –12/11/2025

Comment #1

Enquiry A: Applicability

In Paragraph 1.A APPLICABILITY of Airbus SB A380-57-8278, there are following notes to clarify the affected aircrafts.

"QUOTE"

NOTE: This Service Bulletin is only applicable to aircraft on which MOD No. 71223T62347 (DESIGN WEIGHTS - INTRODUCE PROVISIONS FOR ENHANCED A380-800 (INCREASED DESIGN WEIGHTS CAPABILITY)) is embodied.

NOTE: This Service Bulletin is only applicable to aircraft on which:

- MOD No. 73786T62352 (MISCELLANEOUS-DESIGN WEIGHTS-INTRODUCE WEIGHT VARIANT 006 : MTOW 573 T, MLW 393 T, MZFW 368 T) is embodied

or

- MOD No. 78957T87748 (Service Bulletin No. A380-03-8017) is embodied

or

- MOD No. 73787T62351 (MISCELLANEOUS-DESIGN WEIGHTS-INTRODUCE WEIGHT VARIANT 008 : MTOW 575 T, MLW 394 T, MZFW 369 T) is embodied

or

- MOD No. 75724T62364 (MISCELLANEOUS-DESIGN WEIGHTS-INTRODUCE WEIGHT VARIANT 011 - MTOW 575 T, MLW 395 T, MZFW 369 T (WV 011)) is embodied.

"UNQUOTE"

On the other hand, Applicability of EASA PAD 25-159 does not have the same notes.



Since Airbus SB A380-57-8278 Paragraph 1.C. RESON describes that an inspection is necessary to **WV006, WV008 and WV011 aircrafts**, Please add the same notes shown above to EASA AD.

REQUEST A:

Please add the notes above to Applicability column of EASA AD.

Enquiry B: Parts Installation

Paragraph (3) of EASA PAD 25-159, following is described.

"QUOTE"

(3) For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install an affected part on an aeroplane, provided that the P/N of that part is consistent with that specified in the updated IPC, as defined in this AD.

"UNQUOTE"

However, there is a potential risk to accidentally deviate to the requirement at the cases of;

- If Airbus releases SB with modified P/N and the operator installs it before IPC update.
- Due to the shortage of the affected parts, operators may install the alternate P/N in accordance with Airbus RDAF.

To avoid the cases, please change the sentence as follows.

(3) For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install an affected part on an aeroplane, provided that the P/N of that part is consistent with that specified in the updated IPC, as defined in this AD **or an approved alternate P/N by Airbus**.

REQUEST B:

Please add the "**or an approved alternate P/N by Airbus**." to Paragraph (3) of EASA AD as shown above.

EASA response:

Comment #1:

REQUEST A: Comment disagreed. The AD does not need to reference Weight Variants (WV) in addition to Manufacturer Serial Numbers (MSNs). The inspection is a one-off action, and the affected WV are already fully captured by the listed MSNs. Any future part replacements during the compliance period are covered by the updated IPC, ensuring validity without additional WV references. In the SB, WV definitions serve only as informational aids, whereas the AD must rely on MSNs as the authoritative identifiers. Therefore, listing WV in the AD wording would be redundant and is not required for clarity.

REQUEST B: Comment disagreed. The proposed addition "or an approved alternate P/N by Airbus" is not accepted. At the time of issuance of this AD, eligibility of a part for installation requires that the part number (P/N) is explicitly identified in the applicable Illustrated Parts Catalogue (IPC) as



referenced in this AD. EASA cannot provide a blanket approval for any future alternate P/Ns, even if subsequently certified by Airbus or another Design Approval Holder.

However, in accordance with the provisions of Regulation (EU) No 748/2012 and Part 21, any new or modified part developed and certified by Airbus, or by another eligible and privileged Design Approval Holder, may be considered for installation through the Alternate Means of Compliance (AMOC) process. Operators seeking to install such parts must obtain prior approval from EASA under the AMOC procedure, demonstrating that the part is certified for integration into the aircraft and that its installation maintains compliance with the requirements of this AD.

Therefore, only the P/Ns specified in the updated IPC, as defined in this AD, are eligible for installation without further approval.

