

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-169

[Published on 03 November 2025 and officially closed for comments on 01 December 2025]

### Commenter 1: SAS AVIALAVAL – Jérôme Baron – 06/11/2025

#### Comment #1

Since revision number 8 of document 02334 concerning the Airworthiness Limitations of the PC6 series, dated November 21, 2018, several maintenance tasks concerning repetitive visual and NDT inspections of critical aircraft parts such as FR12A, Trim Actuator attachement, Stabilizer Trim Attachment Components FR12A and Left and Right Wing-Strut Fitting were required.

Would it be possible for you, upon publication of this new AD, to take the opportunity to cancel AD 2007-0241, which becomes obsolete since all the security measures for all critical inspections are included in A.L Document n° 2334 in this latest revision n°13 of October/31/2025?

Would this allow organizations insured for continued airworthiness to no longer have multiple parallel references that refer to the same thing?

#### **EASA response:**

***Comment agreed. The requirements of EASA AD 2007-0241R4 have been taken over by the ALS, and consequently, this AD can be superseded.***

***The Final AD has been amended accordingly.***

### Commenter 2: Turgis Gaillard Blois Aero Services – Thomas Fournet – 07/11/2025

#### Comment #2

Apart from the concept of supersedes in AD 2020-0278, we do not understand the ultimate purpose of this PAD. We went back to AD 2010-0176 and compared AMM 1975 revisions 37, 38 and 39.

In this regard, our PC-6s are H4 and we only use the AMM because the ALS does not refer to it. The only difference we found is the reference in AD 2020-0278 to chapter 53-00-01 fuselage wing fittings, which no longer appears in PAD 25-169.

Could you please clarify the relevance of this PAD?



**EASA response:**

**Comment not agreed.**

**EASA ALS ADs do not detail the changes introduced by the ALS, but define the reference documents to be used by the maintenance organizations.**

**The PAD 25-169 references the following publications:**

**Pilatus PC-6 ALS Document Number 02334, issue 13 dated 31 October 2025.**

**Pilatus PC-6 AMM, Chapter 04-00-00, Document Number 01975, issue 39 dated 31 October 2025.**

**Those revisions of the ALS include new and/or more restrictive tasks and limitations. Consequently, EASA AD 2020-0278, which mandated the AMM 01975 Revision 30 and ALS 02334 Revision 10, is superseded.**

**The changes to the ALS are identified in the change record of the AMM 01975 respectively the ALS 02334.**

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

### **Commenter 3: AeLo Maintenance SA – Marco Malnati – 04/12/2025**

**Comment #3**

Many of these aircraft are managed by a CAMO, which is responsible for periodically monitoring the applicable maintenance data and updating the AMP accordingly. In any case, even when an aircraft is not under CAMO management, the ARS is required, during the ARC renewal, to verify that the aircraft complies with all mandatory requirements (ATA 04, ADs, etc.).

In my view, issuing an Airworthiness Directive every time the ATA 04 section is amended is not particularly effective and does not add meaningful safety barriers, especially for operators who do not have a CAMO and therefore do not systematically and periodically review ADs. These operators are often not sufficiently trained and tend to rely on the CAMO or maintenance organisations to perform such checks.

**EASA response:**

**Comment noted.**

**The ALS is part of the certificated product (aircraft, engine, propeller) type design (Part 21.A.31.a), that contains the mandatory scheduled maintenance items and the limitations for part replacement, necessary to maintain compliance with that type design. For each individual aircraft, an approved aircraft maintenance programme (AMP) must be created, initially containing the ALS at the revision level applicable at the time of the aircraft's first certificate of airworthiness.**



*The ALS content is regulated by the airworthiness codes, e.g. CS 23.1529, Appendix 4G. Each subsequent change to the ALS is approved by EASA. In view of the nature of the tasks contained in the ALS, failure to comply with an ALS revision (i.e. new or more restrictive tasks) would – in general – lead to an unsafe condition. Since EASA (under art. 77(1) of regulation (EU) 2018/1139) carries out the ICAO functions and tasks of the State of Design on behalf of EASA Member States, EASA notifies new or more restrictive ALS tasks as ‘Mandatory Continued Airworthiness Information’ to ICAO Contracting States by taking AD action for these specific ALS revisions.*

*In case an ALS revision only provides ‘relief’ (less restrictive), no AD will be issued, as there would be no ‘safety’ justification for such action. The existing EASA AD for a previous ALS revision, however, always allows the use of ‘later approved revisions’ to ensure compliance with the AD, which includes the use of any extended compliance time(s).*

*Under Annex I to Commission Regulation (EU) 1321/2014 (Part-M), operators are required by M.A.302 (a) to have an approved AMP, which establishes compliance – M.A.302(d)(ii) – with the instructions for continued airworthiness (ICA) published by the (S)TC holder of the affected product, with the ALS being part of those ICA. However, Part-M does not specify exactly when, after publication of an ALS revision, an AMP must demonstrate compliance with that particular ALS revision and, consequently, from which time the new or more restrictive ALS tasks must be complied with. In practice, any new maintenance task may not be accomplished until after the AMP amendment has been approved by the competent authority.*

*These are additional reasons why EASA issues an AD for an ALS revision: to require, from the effective date of the AD (even before the AMP amendment), the accomplishment of the maintenance tasks (before exceeding their due date) and to require the amendment of the AMP within a clear (and reasonable) compliance time.*

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

