

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-172

[Published on 10 November 2025 and officially closed for comments on 08 December 2025]

Commenter 1: Swiss International Air Lines Ltd. – Cani Aliji – 11/11/2025

Comment # 1

In regard to PAD 25-172, I would like to raise a comment concerning the threshold of the minimum 2000 flight cycles.

What is the situation for components on which the SB was already incorporated before reaching 2000 FC?

This should be explicitly clarified — whether the inspection must be re-performed once the component reaches 2000 FC, or if it can be considered compliant despite the earlier embodiment.

As an example, we have one aircraft where the SB was performed at 1618 FC.

EASA response:

Comment noted. The AD requires to accomplish the inspection after the affected part accumulated 2 000 FC since first installation on an aeroplane. Consequently the inspection performed at 1 618 FC does not comply with the requirements of the AD.

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

Commenter 2: Singapore Airlines Limited – Patrick Pak – 17/11/2025 and 27/11/2025

Comment # 2

SIA have query regarding PAD 25-172 where the inspection threshold has included 2000 FC since first installation on the airplane in PAD paragraph (1) and (2).

SIA has affected parts that had accumulated more than 2050 FC today since the first installation that hasn't carried out the inspection yet, what will be the compliance we need to follow?



Please allow me to clarify my previous query and additional comment below:

1) SIA faces challenges due to a large fleet size of 65 aircraft with varying utilisation. The oldest aircraft is 6,543 FC whilst the youngest aircraft is 700 FC, as of 27 Nov 2025.

For those aircraft not yet inspected, what would be the initial threshold?

2) If SIA undertakes a loan unit from another operator due to bird strike or other damage, the donor operator should provide a Cycles Since Overhaul (CSO) stated in their EASA Form 1 for SIA's internal tracking.

EASA response:

Comment noted. The AD requires to accomplish the inspection after the affected part accumulated 2 000 FC since first installation on an aeroplane, and within 78 months after 20 March 2024 [the effective date of EASA AD 2024-0060], or 144 months since the aeroplane reference date, whichever occurs first. The assessment, if the AD provisions apply should be made by each operator, and in case of doubt, it is recommended to seek advice of the National Aviation Authority of the State of Registry of the aircraft.

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

Commenter 3: Singapore Airlines – He Jiahao (Ryan) – 03/12/2025

Comment # 3

It was stated that before the AD compliance deadline, the inlet cowls will be free to be inspected any time after 2000 FC. This could mean that the inspection can be carried out when the inlet cowl has over 6000 FC (our current highest is around 5000 FC) before the deadline. Therefore, what is the rationale in only allowing for a 50 FC allowance after the AD compliance date? From our understanding, the inspection should be driven by the FC of the inlet cowl and not a date for completion since the hole elongation will only be induced when the aircraft is in flight.

Therefore, we would like to ask if there can be an amendment to remove the compliance deadline and instead drive the inspection by using the accumulated FC of the inlet cowl.

EASA response:

Comment noted. The risk assessment does not allow for the definition of the compliance time based on FC only.



As the compliance time requirement in paragraph (1) of the AD is constituted by both, calendar and FC conditions, which may, in specific circumstances, be impossible to be met at the same time (e.g. very low usage rate aircraft), the provisions in paragraph (2) cover such specific case defining a compliance time requirement expressed only in FC.

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

Commenter 4: Cathay Pacific Airways Limited – Annie Chow – 03/12/2025

Comment # 4

A. In Part (1) Inspection(s), it states the following:

Inspection(s):

- (1) For Group 1 aeroplanes: Unless otherwise required by paragraph (2) of this AD, within 78 months after 20 March 2024 [the effective date of EASA AD 2024-0060], or 144 months since the aeroplane reference date, whichever occurs first, but not before that affected part accumulated 2 000 FC since first installation on an aeroplane, accomplish SDI of each affected part in accordance with the instructions of the SB.
- (2) If, upon reaching 78 months after 20 March 2024 [the effective date of EASA AD 2024-0060], or 144 months since the aeroplane reference date, whichever occurs first, an affected part installed on that aeroplane has accumulated less than 2 000 FC since first installation on an aeroplane, the inspection of that affected part, as required by paragraph (1) of this AD, must be deferred until that part has accumulated 2 000 FC, without exceeding 2 050 FC, since first installation on an aeroplane.

CPA would like to ask if CPA inspected inlet cowl which accumulated less than 2000 FC previously during AD 2024-0060R1, does it falls into inspection (1) or (2) to perform the inspection again when the part had accumulated 2000 FC?

B. In Para (4) Part(s) Installation, it states the following:



Part(s) Installation:

- (7) For Group 1 and Group 2 aeroplanes: From 20 March 2024 [the effective date of EASA AD 2024-0060], it is allowed to install an affected part having accumulated 2 000 FC or more since first installation on an aeroplane, provided that, before installation, that affected part has been inspected, and, depending on findings, corrected, as required by this AD.
- (8) For Group 1 and Group 2 aeroplanes: From the effective date of the AD, it is allowed to install an affected part having accumulated **less** than 2 000 FC since first installation on an aeroplane. Following that installation, the aeroplane is effectively a Group 1, and that affected part must be inspected, and depending on findings, corrected, as required by paragraphs (1) to (3) of this AD, as applicable.

Note 1: Removal of an affected part from an aeroplane and subsequent re-installation of that part at the same location of the same aeroplane, accomplished during a single maintenance visit, is not considered as 'install' as specified in paragraphs (6) and (7) of this AD.

It appears the intent of this paragraph is to ensure full control of the Nose cowls to mitigate the possibility of these units' movements between aircraft resulting these units either being inspected beyond the compliance threshold or worse, omitted from the scheduled AD inspection altogether. Ultimately, the intent of the AD is to ensure that ALL nose cowls, no matter which aircraft they are attached to, will be inspected within the compliance threshold. Please confirm.

EASA response:

- A. Comment noted. EASA AD requires in paragraph (1) to accomplish the inspection not before the affected part accumulated 2 000 FC since first installation on an aeroplane. Based on the information provided by the commentor, the inlet cowls referred to, have, therefore, to be reinspected after having accumulated 2 000 FC, in accordance with the requirements of paragraph (1) of the AD.**
- B. Comment noted. EASA confirms this understanding.**
- No changes have been made to the Final AD in response to these comments.**

