

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-173

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Commenter 1: Turkish Airlines – Mehmet Ali Kartkaya – 12/11/2025

Comment #1

There are some unclear points for the below indicated items:

A. Compliance Time, Table 1 for initial inspection, for Group 2, item B)

We have 4 aircrafts which MMEL item 49-16-01 A, 49-16-01D or 49-16-01E dated before 13 October 2025 is applied on, 4 months already passed for these aircrafts and we are already at overdue condition, there is no compliance time give for this case because the compliance time has been indicated in the table as “within 4 months after that MMEL application” not “within 4 months after the effective date of this AD”. This issue makes immediate application requirement for those 4 aircrafts. For example; MMEL applied 10.02.2024, when we add 4 months, compliance date is until 09.06.2024 which is already overdue.

Even though the condition is revised as “within 4 months after the effective date of this AD” like proposed above, in this case there is no difference between Group 1 and Group 2 compliance times, both require compliance within 4 months, there is no additional flexibility for Group 2 with compared to Group 1.

For this issue, the condition of Group 2 needs to be revised as logic as AOT as below;

Group 2:

“Within 8 months after the effective date of this AD”

If the MMEL 49-16-01A, 49-16-01D or 49-16-01E is applied after AD issuance; whichever occurs first, A or B:

A) 4 months after MMEL application

B) 8 months after AD issuance

B. Compliance Time, Table 1 for initial inspection, for Group 3, item D)

There is no condition of MMEL items in the definition of Group 3 but, item D) defines compliance time related with MMEL item 49-16-01 A, 49-16-01D or 49-16-01E dated before 13 October 2025 is applied on. The condition for MMEL items has already been defined in the item B), so there should not be any compliance definition of MMEL items which applied before 13 October 2025 in the item D).



To indicate the condition of MMEL items which applied after 13 October 2025 and new aircraft deliveries, it can be applied as below;

Group 3:

“Within 12 months after AD issuance or 12 months after aircraft delivery, whichever comes later.”

If the MMEL 49-16-01A, 49-16-01D or 49-16-01E is applied after AD issuance; whichever occurs first, C or D:

C) 8 months after MMEL application

D) 12 months after AD issuance

Please provide simple compliance definitions which are similar to AOT-A49P001-25 revision 1 which has clear and simple definition.

EASA response:

A. Comment noted. If the aircraft referred to by the commentor meet the Group 2 definition, the compliance Table 1 requires to accomplish the initial inspection at the threshold defined by A) or B), whichever occurs first. Under the circumstances provided by the commentor (MMEL item 49-16-01 A, 49-16-01D or 49-16-01E dated before 13 October 2025 applied several months prior to the AD effective date) the AD therefore already allows for an 8 months (after the AD effective date) compliance time, which is identical to the commentor’s proposal.

B. Comment noted. Group 3 aeroplanes may have been operated under MMEL item 49-16-01A, 49-16-01D or 49-16-01E dated before 13 October 2025 on or after AD effective date. Consequently, the condition D) would apply to them. The condition B) applies to Group 2 aeroplanes only.

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

