

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-186

[Published on 11 December 2025 and officially closed for comments on 08 January 2025]

Commenter 1: G. Scholten – 21/12/2025

Comment # 1

In my opinion, the publication of airworthiness directives is excessive, as according to the SB of TC holder DG Aviation, this is an isolated case on a single aircraft. The design feature is more than 30 years in service, without any occurrence with one current exception. It isn't a fundamental design fault. SIB's should be sufficient in this case. There is a suspicion that the publication of the SB is intended to promote the sale of special components that are not absolutely necessary for a safe solution to the potential problem. For example, the predecessor company DG had secured the bearing on the aileron/flap mixer in the DG 600 model with a large washer (see attached photo), a simple and inexpensive solution that could also be used on the control stick.

EASA response:

EASA disagrees.

Because of the possible catastrophic impact of a possible failure, analysis done by DG led to the discussion of development of the measure published in the service bulletin to handle this unsafe condition. The proposed new design was developed by the engineering team of DG Aviation and found to be suitable to restore airworthiness of the approved design. However, according to Remark #1 of the AD, it is possible to propose other solutions by requesting Alternative Means of Compliance.

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

Commenter 2: Martin Zahalka – 22/12/2025

Comment # 2

Greetings,



issuing an AD with the need to order parts from the manufacturer is an abuse of authority. The bearings can be secured against falling out using two flat washers that are placed in place of the proposed plate. The price of the material will be about 1 EUR. And the material can be bought everywhere. I would leave the implementation to the responsibility of the part 66 license technician. After the last AD due to the replacement of the elevator rod, I don't trust the manufacturer. As a replacement part, they sent me a structurally identical part, which I removed, and moreover, it was welded very poorly! I still don't understand why the AD was necessary!

EASA response:

See EASA response to Comment #1.

