

## COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-187

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**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 type 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.***

