

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 25-194

[Published on 16 December 2025 and officially closed for comments on 13 January 2026]

Commenter 1: L3Harris MAS Inc. – Cedric Lacoste – 17/12/2025

Comment # 1

Regarding the initial compliance table of the PAD 25-194, could the last accomplishment of the MPD task 282400-03-1 be considered as an acceptable date for the start of repetitive inspection as it is considered as an acceptable means of compliance or is it required to redo the task again within 35 MO of the AD effective date even if the MPD task was carried in 2023 and that no LP SOV was replaced since then?

EASA response:

Comment not agreed. As part of the corrective actions proposed by Airbus related to the potential unsafe condition addressed by the AD, a complete fleet inspection within 35 months has been agreed. The AD has been modified to clarify that only those maintenance actions accomplished after the issue date of the SB are acceptable for compliance.

Commenter 2: Cathay Pacific Airways Limited – Michelle My Lee – 19/12/2025

Comment # 2

CPA's interpretation of paragraph (6) is that the leak check meets the requirement of MPD task 282400-03-3 for A340-200/300 and MPD task 282400-03-1 for A340-500/600 only.

CPA understood from certain Airbus discussion that the leak check also meets the requirement of MPD task 282400-03-1 for the A330 fleet affected by this AD and MPD task 282400-03-2 for A340-200/300 fleet

For clarity, CPA would like to request the paragraph to list out all applicable fleets, in wordings similar to the following:



Accomplishment of a leak check on an aeroplane, in accordance with the instructions of the SB, meets the requirement to perform MPD task 282400-03-1 (for A330, CMR for A340-500/600), MPD task 282400-03-2 (for A340-200/300) or MPD task 282400-03-3 (CMR for A340-200/300)

EASA response:

Comment not agreed. Paragraph (6) of the PAD (now paragraph (7) of the AD) has been included to allow using the SB to concurrently comply with the applicable requirements from ALS Part 3 AD; otherwise, after accomplishment of the SB, operator would have to accomplish also the CMR task to comply with that ALS AD.

Since MPD task 282400-03-1 for the A330 fleet and 282400-03-2 for A340-200/300 fleet are not CMR, there is no need to include them in this paragraph.

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

Commenter 3: Turkish Airlines – Burak Fidan – 23/12/2025

Comment # 3

According to EASA PAD 25-194 Required Action(s) paragraph.4 SB (SB A330-28-3145, SB A340-28-4146 and SB A340-28-5064) must be performed before each installation. AMM LP Fuel Valve installation task (28-24-41-400-803-A) contains operational test of the LP fuel shut-off valve and Leak Test currently. Airbus SB's is referring to same AMM test procedures which is performed during installation AMM task. We think that current AMM installation procedure is covering requirements which are indicated in the SB. This situation bring about duplication of the leak test which is indicated both SB and AMM. Following leak check before each installation with SB will lead to confusion in the future. For credit section A330 MPD task (282400-03-1) is not stated in Credit section (6):

- A. Could you please review that whether following leak check before each installation with SB is necessary?
- B. Could you please review to update credit to include A330 MPD (282400-03-1) task?

EASA response:

Comment 3A) Comment noted. EASA confirm that a leak check before next flight is required following the installation of a LP fuel shut-off valve. However, a credit paragraph has been added to the final AD to clarify the set of referenced publications acceptable to perform such a check.

Comment 3B) See EASA answer to Comment # 2.



Commenter 4: : Qatar Airways – Prem Subramaniam – 01/01/2026
Comment # 4

We observed that only FH timeline introduction as only difference between PAD, A330 SB A330-28-3145 & A340-200/-300 SB A340-28-4146 and MPD 282400-03-1, -2, -3, and would like to highlight following remarks/ request against PAD mandates;

- A. Paragraph (4) states perform leak check again post LPSOV replacement after leak findings. In fact, QTR also proposes to validate AMM Task 28-24-00-710-807, AMM Task 28-24-41-000-803 & AMM Task 28-24-41-400-803 actions during unscheduled replacement too (i.e. without involving AD/ MPD/ SB inspection activity) to comply with AD requirements.
- B. Paragraph (5) states MPD accomplishment as AMOC to Paragraph (1). In fact, QTR proposes that MPD 282400-03-1, -2, -3 compliance will be equivalent to compliance as per Paragraphs (1), (2) and (4).
- C. With MPD 282400-03-1, -2, -3 already existing under non-mandatory category on certain fleets, then EASA to advice Airbus to escalate & mandate existing task/ control (instead of separate AD/ SB to avoid duplication).

EASA response:

Comment 4A) See EASA answer to comment # 3A.

Comment 4B) Comment agreed. Final AD has been updated accordingly.

Comment 4C) Comment noted. No changes have been made to the Final AD in response to this comment

Commenter 5: Swiss International Air Lines Ltd. – Nils Mueller – 06/01/2026
Comment # 5

For paragraph “Part(s) Installation: (4)” it is mentioned that the affected part should pass “a leak check in accordance with the instructions of the SB”. Since during unscheduled replacements it is not practical to reference the SB for the leak check, and since the leak check is covered under the AMM installation task 28-24-41-400-803-A (A330) with SUBTASK 28-24-41-790-055-B, we would like to request that paragraph (4) of the AD be amended to state that either the SB instructions OR the AMM instructions can be followed.



As an alternative the "Credit" paragraph could be adjusted to include another paragraph, that replacement as per the above AMM task meets the requirements for the part installation.

This would also alleviate the burden of the reporting during unscheduled replacements which is mentioned in the leak check section of the SB.

EASA response:

See EASA answer to comment # 3A.

To be noted that no reporting is required by the AD.

Commenter 6: Delta Air Lines, Inc. – Michael D. Tharp – 12/01/2026

Comment # 6

This EASA PAD states the definition of 'Aeroplane Reference Date' as "The date of transfer of title (ownership) of the aeroplane upon delivery by Airbus to the first operator, which is referenced in Airbus documentation."

Is this definition equivalent to the date of approval of the Airbus AIR document, or the actual delivery date? For example, for AC MSN 1915, Airbus AIR Doc page 2 states "established and verified" and "approved" on 22 MAY 2019, but, per DAL delivery records, DAL received AC 1915 on 23 MAY 2019, which date should be utilized for the compliance timeline?

EASA response:

Comment noted. Reference must be made to the Transfer of Title (ToT) as defined in the applicable Airbus Maintenance Planning Document (see below extract – Source Airbus).



The Transfer of Title (ToT) is when conformity and contractual documentation is handed over and the Certificate of Acceptance is signed, this identifying the official transfer of ownership to the first buyer. In the absence of the date of ToT, an operator may refer to the 'Delivery Date' as recorded in the A/C documentation. This information is available on Airbus|World:

- select "APP catalogue"
- search for Apps "CDIS"
- open "CDIS A/C information" or any other APP, if needed
- select aircraft "Family", insert "MSN" and then click on "Search"

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

Commenter 7: Air France Industries KLM Engineering & Maintenance – Jean Michot – 07/01/2026

Comment # 7

AIRBUS stated in attached TFU 28.24.00006 that only aircraft fitted with Rolls-Royce (RR) engines are concerned. While the PAD doesn't mention any engine type condition.

Could you clarify the situation for companies using other engine types than RR ?

EASA response:

Comment not agreed. EASA confirm that all the models as listed in the AD Applicability (equipped with Rolls-Royce or CFMI engines) are affected.

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



Commenter 8: Scandinavian Airlines System – Ufuk Gözaçan – 29/01/2026**Comment # 8**

We kindly request your clarification regarding PAD 25-194 Parag(4).

Could you please confirm whether accomplishment of the associated Service Bulletin is required prior to next flight following valve installation?

The SB refers to the operational test of the LPSOV (AMM TASK 28-24-00-710-803), which is already performed during the valve installation AMM procedure.

We would appreciate your guidance on whether completion of this AMM operational test is considered sufficient for compliance, or if any additional action is required before next flight

EASA response:

See EASA answer to comment # 3A.

