

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-196

[Published on 17 December 2025 and officially closed for comments on 14 January 2026]

**Commenter 1: Deutsche Lufthansa AG – Florian Schmucker – 19/12/2025**

### Comment #1

- A. In the “Reason” section, the AD action is defined in such a way that a one-time GVI inspection and a full panel thickness measurement are to be performed for each affected part. However, the AOT describes that the GVI and the thickness measurement are only required if CAT C / temporary repairs are identified during the maintenance record check (within 30 days from the AOT effective date). If no Cat C / temporary repairs are present, no GVI and NDT is required within the AOT. This distinction, which is defined in the AOT, is missing in the PAD section.
- B. Furthermore, the “Reporting” section (1) and (2) lacks information on how Group 2 aircraft are to be handled. There is no instruction as to whether reporting is required. In the AOT, reporting for Group 2 after the record check (with or without findings) is defined.
- C. The last point concerns paragraph (7). If, as an operator, we decide to perform a panel thickness measurement on a Group 2 aircraft and it is determined that there are no deviations from the drawing tolerances, the SRM restrictions are intended to be lifted. This has been confirmed to us in writing by Airbus and was also communicated to operators on 18.12.2025 during the Airbus webinar. The lifting of the SRM restrictions is to be made effective through an AOT revision. As paragraph (7) is currently defined in the PAD, we are still not permitted to use the affected SRM tasks despite conformity with drawing tolerances. Consequently, no exit criterium is provided within this PAD paragraph for Group 2 aircraft.

### **EASA response:**

#### **Comment noted.**

**A. The Group definition defines that Group 1 aeroplanes are those having any Structural Repair Manual (SRM) task as listed in Appendix 2 of the AOT, category (CAT) C (temporary) repair embodied and/or any CAT C repair, covered by an Airbus Repair Design Approval Form (RDAF), embodied. This means, the requirements in paragraph (1), (2) and (3), etc. are only applicable to Group 1 aeroplanes. The difference in timeframe is due to the consideration of the consultation period of the PAD and another 2 weeks from issuance of the final AD, until it is effective.**

**B. Group 2 aeroplanes are not affected by paragraphs (1) and (2) of this AD.**

**C. The instructions in the referenced AoT do not permit to conduct a full mapping of the panels to the extent of concluding on a fully conforming panel. For this reason, the SRM limitation as per paragraph (7) of the AD is retained for both group 1 and group 2 panels. Once inspection**



*instructions would be developed to this end, the AD would be revised to remove the SRM limitation. Alternatively, AMOC might be requested with appropriate alternative means.*

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

**Commenter 2: TAP Portugal - João Martins – 19/12/2025**

**Comment #2**

The PAD does not specify any terminating actions. Could you clarify whether, once an affected aircraft has been restored to a safe condition (either through local fuselage skin reinforcement or full panel replacement in accordance with Airbus-approved repair instructions) the restrictions in paragraphs (6) and (7) would no longer apply?

Maintaining these limitations after the aircraft has been fully repaired could impose unnecessary operational constraints without improving safety.

**EASA response:**

***Refer to the answer to comment 1C.***

**Commenter 3: Delta Air Lines, Inc. – Brenna Dittmar & Michael D. Tharp – 12/01/2026**

**Comment #3**

**Reference:**

(A) EASA Proposed Airworthiness Directive: PAD No. 25-196, dated 17 Dec 25

(B) Airbus AOT A53N020-25 Rev 01, dated 23 Dec 25

**Commenter Request**

Modify Ref (A) PAD, “Applicability” paragraph, to refer to “Revision 1 or later”.

**Request justification**

Since Ref (A) issuance, Rev 1 of Ref (B) has been released and expands applicability to include an additional aircraft MSN.



List paragraphs that change; describe (nonobvious) changes

Applicability: Refer to “AOT at Revision 1 or later”.

***EASA response: Comments agreed. Final AD has been updated accordingly. Please also note that a credit paragraph (9) was added to the AD.***

