

## COMMENT RESPONSE DOCUMENT

**EASA PAD No.: 26-013**

**[Published on 26 January 2026 and officially closed for comments on 16 February 2026]**

### **Commenter 1: FedEx – Bennett Wetherald – 13 February 2026**

#### **Comment # 1**

##### **References:**

/A/ EASA PAD 26-013, Issue date 26 January 2026

/B/ Airbus SB A300-53-6175 Revision, 3 dated 18 November 2025

/C/ EASA AD 2022-0078, dated 18 May 2022

In response to Ref /A/ PAD, FedEx offers the following comments:

1. The proposed Airworthiness Directive (AD) will be effective for twenty-six (26) A300-600 model airplanes currently on the FedEx Op Spec.
2. FedEx reviewed that the new proposed AD Ref /A/ supersedes Ref /C/ and requires accomplishment of the repetitive HFEC inspections within reduced initial compliance time.
3. The proposed AD Ref /A/ paragraph 2 states that if any crack is found before the next flight, contact Airbus for approved repair instructions. FedEx would like EASA to add a statement in the Ref /A/ paragraph 2 corrective action that if any crack is found, repair it per the SRM instructions. Based on the last FedEx and Airbus TRM meeting, Airbus will implement the approved repair instructions in the SRM manual.
4. FedEx has determined that the new inspection threshold defined in Ref /A/ and /B/ will not fit within our planned scheduled maintenance checks. Therefore, there will be an impact on the available lift and requesting EASA and Airbus to extend the 24-month grace period to 30 months.
5. The proposed AD inspections do not require special inspection techniques, training or tooling outside the resources of Fed.



**EASA response to Comment #1:****1. Comment noted.**

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

**2. Comment noted.**

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

**3. EASA acknowledges the comment. The corrective action in paragraph (2) of Ref. A requires that, if any crack is detected, the operator must contact Airbus for approved repair instructions. At this stage, the repair instructions discussed between Airbus and FedEx during the latest TRM meeting have not yet been incorporated into the SRM, and therefore cannot be referenced as an approved source of repair data for compliance with this AD. Until the SRM is formally updated and the corresponding repair becomes part of the approved data set, EASA cannot introduce a statement authorising repair in accordance with the SRM. The requirement to obtain Airbus-approved repair instructions therefore remains unchanged.**

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

**4. EASA notes the operator's request to extend the proposed 24-month grace period to 30 months. The 24-month threshold was established based on updated fleet-level fatigue-damage-tolerance analysis from the TCH and reflects the level of risk to which the global A300-600/A310 fleet is exposed. As is standard, the grace period represents the maximum time during which the unsafe condition can remain unaddressed while maintaining an acceptable level of safety. Extending the grace period to 30 months would allow certain aircraft to exceed the exposure limits used in the revised structural assessment. For this reason, EASA intends to retain the 24-month grace period in the final rule.**

*However, EASA recognises that individual operators may face unique maintenance-planning constraints. In such cases, operators may request an Alternative Means of Compliance (AMOC), supported by utilisation data and any proposed compensating measures, to demonstrate that an equivalent level of safety can be maintained.*

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

**5. Comment noted.**

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

