

## COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-020

[Published on 30 January 2026 and officially closed for comments on 27 February 2026]

**Commenter 1: Air New Zealand – Ella Fraser Cornish – 03/02/2026**

### **Comment # 1**

We believe the proposed compliance time is too short. The subject PAD action seems to be for the purpose of gathering information, rather than directly addressing an airworthiness concern. However, the 6 months compliance period means significant planning and resource is required to complete the inspection on our fleet of 31 aircraft. This challenge is compounded by the lack of spares availability, as the tight inspection schedule, before next flight requirement for parts replacement (if leakage out of tolerance is detected), and AOG only parts supply, leaves the potential for multiple aircraft to be grounded at once.

### **EASA response:**

***Comment noted. The compliance time together with the required action are integral elements of the purpose of the AD, to correct the unsafe condition. The compliance time has been established following a fleet-level risk assessment that considered the severity of the unsafe condition, the operational exposure of the affected fleet, and the need for timely corrective action.***

***Alternatively, the operator may consult its national aviation authority regarding the flexibility provisions contained in the EASA Basic Regulation (Regulation (EU) 2018/1139), or may apply for an Alternative Method of Compliance (AMOC) if a different means of achieving the required level of safety can be demonstrated.***

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



**Commenter 2: Swiftair – Alejandro López Ramos – 03/02/2026****Comment # 2**

- a. Paragraph (5) of the mentioned PAD states that "it is allowed to install an affected part on an aeroplane, provided that the part is a serviceable part". It also specifies that a Landing Gear Selector Valve (LGSV) which has passed the applicable inspection, with no leak out of tolerance detected, is considered a serviceable part.  
In this context, we would like to kindly confirm whether it is necessary to perform the test again after installation of the valve, or if the valve can be considered serviceable based on the previously passed test.
- b. We would kindly appreciate your support in clarifying, in the final AD, that once an LGSV P/N 100-5383Y00 with a serial number below 1930, or S/N 1934, 1935, 1936, or 1937, accumulates more than 5,000 CSN, it becomes an affected part and the required test must be performed. As long as such LGSV has accumulated less than 5,000CSN, it should be considered serviceable.

**EASA response:**

- a. ***Comment noted: If a leakage test is successfully passed on an LGSV identified as an affected part, the valve is considered serviceable. In this case, if the part is subsequently installed on another aircraft, no additional leakage test is required after installation. No changes have been made to the Final AD in response to this comment.***
- b. ***Comment noted. In accordance with the definition of the serviceable part of the AD "...an affected part, that accumulated less than 5 500 flight cycles (FC) since new (first installation on an aeroplane)" is considered to be a serviceable part and is eligible to meet the requirement of paragraph (5) of the AD. After installation of such a part, this part shall be inspected and, depending in finding corrected, as required by paragraphs (1), (2) and (3) of the AD. No changes have been made to the Final AD in response to this comment.***



**Commenter 3: Voeazul – Jonas Vieira de Andrade – 10/02/2026****Comment # 3**

Please, confirm if during the leakage test, as required by paragraph (1) or (2) of PAD 26-020, any leakage is detected out of tolerance, as defined in the AOM 2025/11, the aircraft could be released IAW MMEL 32-31-03 (with safety pins installed) in order to replace LGSV in HANGAR (in case of leakage test performed in remote bases). IAW ATR AOM 2025/11 will be necessary to perform Functional Test of the Free-Fall Extension System with the A/C lifted on jacks (limitation to remote bases).

AOM 2025/11:

**Note:** The LGSV replacement shall be done in accordance with the MPs ATR-A-32-31-50-00ZZZ-520Z-A / ATR-A-32-31-50-00ZZZ-720Z-A. The installation MP requires to perform the Functional Test of the Free-Fall Extension System for which the A/C must be lifted on jacks.

ATR MMEL:

**32-31-03 Landing Gear Retraction or Extension and Uplocking System**

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	ALL
	EASA - APPROVED

RI	NI	NR	PLACARD	O	M
A	1	0	YES	YES	NO

May be inoperative provided that:

- (a) Operations are limited to two **calendar days**.
- (b) **ETOPS** operations are not conducted.
- (c) Operations are performed with landing gear down, and
- (d) Operations are conducted in compliance with applicable AFM Deviation Guide.

See Operational procedure **MOP.32.31-03P** Landing Gear Retraction or Extension and Uplocking System (O)

**EASA response:**

**Comment noted. The intent of the AD is that, when the leakage test required by paragraph (1) or (2) shows leakage outside the tolerance defined in AOM 2025/11, the landing gear selector valve (LGSV) must be replaced before the next flight. In this situation, the aircraft cannot be dispatched under the MEL approved by the competent authority, even with safety pins installed, because the AD explicitly requires corrective action prior to further flight. If the operator's intent is not to conduct commercial operations but solely to reposition the aircraft to a maintenance facility, and the leakage is outside the acceptable limits, the operator may request ATR to provide approved instructions allowing to fly the aeroplane to a place where the replacement can be accomplished.**

**We have amended the Final AD accordingly.**



**Commenter 4: Calm Air – Brendin Storseth – 23/02/2026****Comment # 4**

We would like to confirm the intent of the definition of a "serviceable part" regarding landing gear selector valves that are currently off-wing in inventory.

We have multiple units in our inventory for which the time since the first installation is unknown. All of these units have been repaired and tested in accordance with CMM 32-31-51. The way we are reading the PAD, these units would not be allowed for installation on "Group 1" or "Group 2" aircraft. They would need to send out for the VSB prior to installation. Is this the intent of the PAD?

If this is the case, we would suggest an allowance for the installation of an affected part, with the pressure test as per AOM 2025/11 be completed prior to the next flight.

**EASA response:**

***Comment noted. In accordance with the Part Installation requirements of the AD, an affected LGSV may be installed on an aircraft only if it is a serviceable part. The AD defines a serviceable part as either a valve that is not an affected part, or an affected part that has accumulated less than 5 500 FC since new, or an affected part that has passed the required leakage inspection with no leak out of tolerance.***

***The definition of affected part also explicitly excludes any LGSV that has passed this inspection and/or has been re-identified in accordance with the VSB. Consequently, an off-wing LGSV that is initially classified as an affected part may still be installed provided that a leakage test is performed before next flight and no leakage out of tolerance is detected. Once this inspection is passed, the LGSV becomes a serviceable part and is therefore eligible for installation without further leakage testing after installation.***

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

