

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-032

Published on 23 February 2026 and officially closed for comments on 23 March 2026

Commenter 1: China Southern Airlines Co., Ltd. – Fan Jun – 19/03/2026

Comment # 1

- a. For the definition of modification in paragraph (6), each affected EDP on all four locations of an aeroplane should be replaced with an EDP -07 in accordance with the instructions of the SB3, and not before the modification required by paragraph (1). But the EDP -07 can be installed on aeroplane (with HMCA S5) in accordance with MIPD, and even before the SB2 modification required by paragraph (1). The on-wing EDP -07 is not an affected part and not applicable to the SB3. There are less than four locations having affected EDP on an aeroplane. In the scenario, the modification of the aeroplane on all four locations is not practicable in paragraph (7.1). I'm wondering whether the aeroplane will be reclassified as Group 4 after all affected EDPs removal.
- b. In my understanding, the difference between the SB3 modification and the MIPD installation represents the one-way interchangeability introduced by the SB3. For parts installation in paragraph (7.1), if all affected EDPs have not been modified in accordance with the instruction of the SB3, the on-wing EDP -07 installed by MIPD can be replaced by an affected EDP repeatedly until 40 months after the effective date of the incoming AD. I am wondering if the scenario is acceptable.

EASA response:

- a. **Comment noted. As per the definitions in the AD, an aeroplane becomes a Group 4, when installing EDP P/N 53098-07 at all 4 locations. In addition, for Group 4 aeroplanes the Part(s) Installation requirement as per paragraph (7.2) of that AD applies.**
No changes have been made to the Final AD in response to this comment.
- b. **Comment noted. As long as a Group 3 aeroplane remains in that Group, installation of affected parts is allowed, not exceeding the compliance time allowance as per paragraph (6) of that AD.**
No changes have been made to the Final AD in response to this comment.



Commenter 2: JAL Engineering Co.,Ltd. – Ryuhei MIURA – 22/03/2026**Comment # 2**

We would like to request a structural change regarding the Alternative Method of Compliance (AMOC) section, specifically paragraphs (9) and (10).

Proposed Change:

We request that the provisions for installing later HMCA software standards (currently in paragraph 9) and later EDP part numbers (currently in paragraph 10) be moved from the "Alternative Method of Compliance" section directly into the main "Required Action(s)" section (paragraphs 1 and 6 respectively), or be clarified as part of the primary compliance instructions.

Reason for Request:

Under the regulatory framework of the Japan Civil Aviation Bureau (JCAB), when EASA ADs are adopted as Technical Circular Directives (TCDs), items listed strictly under the "AMOC" section, often require a separate formal application for "equivalent safety" or "alternative means" to be officially recognized.

If these provisions for "later approved standards/parts" remain in the AMOC section:

- a. Operators will face an increased administrative burden to apply the equivalence of later-approved modifications to the local authorities.
- b. It complicates the reporting of compliance when the latest, improved parts are already embodied.

By incorporating the phrase "or later approved standard/part" directly into the main requirement paragraphs (as is common in many other EASA ADs), it will facilitate a more efficient and streamlined compliance process for global operators without compromising safety.

Thank you for your consideration of this request to reduce unnecessary administrative complexity.

EASA response:

Comment noted. In EASA procedures, anything which is accepted by an AD to address the unsafe condition is not an AMOC. As clarified in the FAQ, "an Alternative Method of Compliance (AMOC) is an EASA approved deviation to an AD. It is a different way, other than the one specified in an AD, to address an unsafe condition on products, parts and appliances". As a matter of fact, when an operator complies with an AD using any of the methods listed in that AD, there is no deviation requiring further approval. However, to avoid any potential confusion, the title of paragraphs (9) and (10) of the AD has been changed to "Acceptable Method of Compliance".



Commenter 3: JAL Engineering Co.,Ltd. – YOSHIOKA Yukinori – 27/03/2026**Comment # 2**

I would like to provide comments regarding EASA PAD 26-032, although I understand that the deadline for comments has already passed.

I would greatly appreciate it if you could kindly review the following comments:

Comments:

<QUOTE>

Alternative Method of Compliance:

(9) Installing HMCA SW standard later than S6.0 on an aeroplane, in accordance with Airbus approved instructions, is an acceptable method to comply with the requirements of paragraph (1) of this AD for that aeroplane.

(10) Modification of an aeroplane by installing EDP approved later than EDP P/N 53098-07, eligible for installation in accordance with approved Airbus maintenance instructions, is an acceptable method to comply with the requirements of paragraph (6) of this AD for that aeroplane.

<UNQUOTE>

Regarding the term "Alternative Method of Compliance" (AMOC), it is generally understood to mean a method that deviates from the AD but is approved by EASA.

In my understanding, the AMOCs are not defined within the AD itself because methods explicitly listed in the AD are considered the "Method of Compliance," not "Alternative Method of Compliance."

To avoid any potential confusion, I would highly appreciate it if EASA could consider using a different term instead of "Alternative Method of Compliance," such as "Acceptable Method of Compliance."

EASA response:

See answer to Comment # 2.

