

## COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-040

Published on 30 March 2026 and officially closed for comments on 27 April 2026

### Commenter 1: KP Aviation – Raul Lopez – 01/04/2026

#### Comment # 1

Could you please clarify, as per paragraph (1), when the 24-month interval for the repetitive inspection should begin?”?

For instance, if the unit has been inspected at shop level, per VSB 47145-27-16, should the next due date be calculated as 24 months from the last release-to-service date from the shop, or from the date of installation on the aircraft?

#### EASA response:

*Comment noted.*

*The interval starts once the first inspection of the ballscrew of the affected part in accordance with the instructions of the SB is accomplished. See also the answer to comment 3.*

*More generally, please see under this [link the EASA FAQ](#), when the correct reference date for accomplishment of a maintenance task is.*

*No change has been made to the final AD in response to this comment.*

### Commenter 2: United – Kevin Johnson – 01/04/2026

#### Comment # 2

UAL only has editorial feedback for the layout of Appendix 1:

- a. The title of Appendix 1 being “Affected THSA with or without Electrical Load Sensing Device (ELSD)” is slightly misleading since there is now a third category of THSAs with ELSD and with carbon NBB disks. UAL would suggest simplifying the title to just “Affected THSA”.



- b. • UAL would also suggest not creating an untitled new table in Appendix 1 for 47145-347 and 47145-367 and instead suggests adding a new column to the existing table for P/Ns with the carbon NBB disk. In this new column, 47145-347 being added to the row with 47145-147 & 47145-247 and 47145-367 being added to the row with 47145-167 & 47145-267.

**EASA response:**

- A. Comment agreed. The title of Appendix 1 was updated accordingly.**  
**B. Comment not agreed. This would complicate the table as it is depending on the starting pre carbon NBB disk THSA PN.**

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**Commenter 3: Turkish Airline – Yahya Ubeyde Gungor – 06/04/2026**

**Comment # 3**

EASA AD No. 2012-0175R2 requires the initial inspection to be performed in accordance with the instructions of Airbus Service Bulletin A320-27-1214 before accumulating 22 years.

However, ASB A320-27-1214 gives the compliance time for the first inspection as "within 24 months after the THSA has accumulated 20 years since new."

Therefore, unlike the ASB, the AD does not refer to the "20 years" criterion for the initial inspection.

Sometimes, when a THSA is sent to the vendor for another reason, such as repair, the vendor may, without our request, perform the relevant inspection and state on the Form 1 that "the unit passed corrosion inspection as per VSB 47145-27-16, ensuring compliance with EASA AD 2012-0175R2." However, such compliance may be recorded before the THSA has reached 20 years since new.

Therefore, there is a discrepancy between EASA AD No. 2012-0175R2 and ASB A320-27-1214 with respect to the compliance time of the initial inspection. We raised the matter with Airbus Airworthiness Team and received confirmation that an inspection performed before 20 years since new may not be considered as the initial inspection.

The same issue alsoe exists in this new AD, which wil supersede EASA AD No. 2012-0175R2.

Would you kindly consider clarifying this issue in the new upcoming AD?

**EASA response:**

**Comment noted.**



*The interval inspections only starts after the initial inspection has been accomplished as required by the AD and documented as compliance to the AD. This means that if the initial inspection was accomplished before the compliance time of the AD, it may or may not count as initial inspection, depending on how it is marked.*

*No change has been made to the final AD in response to this comment.*

**Commenter 4: easyJet – Fuad Yusifli – 07/04/2026**

**Comment # 4**

easyJet would like to request a potential clarification to the upcoming AD. It is understood that AD 2012-0175R2 is to be superseded with a new AD due to THSA PNR progression following VSB 47145-27-23, and that the new AD will retain the requirements of AD 2012-0175R2.

Within the Required Action(s) and Compliance Time(s) section, paragraph 1 (repetitive inspections), it is specified that for Group 1 aeroplanes: before accumulating 22 years after THSA first flight (see Note 1 of this AD), or within 3 months after 21 September 2012 [the effective date of EASA AD 2012-0175], whichever occurs later, and thereafter at intervals not exceeding 24 months, a detailed inspection of the ballscrew of the affected part must be accomplished in accordance with the instructions of the SB. Referring to the related SB A320-27-1214, the threshold and interval are similar, specifying that if the THSA has accumulated less than 20 years since first flight, the inspection must be performed before 22 years since first flight but not before 20 years since first flight. At aircraft level the AD and SB timescales therefore align, and once the inspection has been performed on wing before the threshold, subsequent inspections are carried out at 24 month intervals.

However, in practice there are cases where the airline receives a THSA back from shop maintenance (typically following scheduled NBB replacement) and the Form 1 indicates that VSB 47145-27-16 has been accomplished. This results in the repetitive inspection sequence effectively commencing at that point, causing additional inspections to be carried out before the 22 year threshold is reached.

Can EASA consider this scenario and include a clarification in the AD regarding whether repetitive inspection is required in the situation described above (for example, where a shop completes VSB 47145-27-16 on a THSA at 15 years since first flight), or whether the repeat inspection should only apply to THSAs beyond 22 years regardless of whether an initial inspection was completed early?

**EASA response:**

**See the answer to comment 3.**



**Commenter 5: JETSTAR AIRWAYS – Tharindu Attanayake – 09/04/2026****Comment # 5**

EASA PAD 26-040, was issued to make THSA PN 47145-347 / 367 effective to the AD. JST has already taken this into account as an additional measure a while ago.

Instead of performing VSB 47145-27-18 (which is the terminating action of AD 2012-0175, which will change the THSA PN to 47145-368), Safran elected to repair the screw jack. Per VSB 47145-27-16 there is no repair scheme for type 2 corrosion.

Since there is no repair scheme in the VSB, how can we safely say the screw shaft is free of corrosion? The AD direct to do corrective action per the SB and the SB corrective action is to replace the THSA with another unit which does not solve the question on what should be the corrective action if an unit is found with type 2 corrosion. Please refer below snippet from Safran for the same query.

I would like EASA feedback and whether the AD wording needs to be added to take these kind of scenarios into account.

Hi Tharindu ,

Before releasing the THSA from the shop, the corrosion inspection in shop as per VSB 47145-27-16 was passed at final stage, this is referenced in the TDR here .

47145-27-16 , Rev 4 , Dated 16 Jul 2015 -> unit compliant

We also stated in the EASA F1 that the AD 2012-0175R2 was cleared :

Unit passed corrosion inspection as per VSB 47145-27-16 insuring compliance to EASA AD 2012-0175R2.

I think this cannot be clearer.

The Safran VSB 47145-27-16 is used in shop to ensure there will be no finding for the on-wing inspection detailed in the Airbus SB A320-27-1227.

As a reminder the EASA AD 2012-0175R2 is asking for a periodic on-wing inspection every 24-month, meaning Sn-1788 must be re-inspected before March 2028.

**EASA response:****Comment noted.**

**Regarding the AD 2012-0175, please note that the VSB 18 is the terminating action of the VSB 16. Any repairs done according to VSB 16 request next inspection within 24 months.**

**Regarding this AD (after PAD 26-040) from the AD standpoint, indeed the SB does not provide “repair instructions” to restore a THSA. It is the TC Holders responsibility to propose corrective actions in accordance with Part 21 and obtain approval from the agency. No repair scheme has been proposed by the applicant in this case to repair a THSA. No change has been made to the final AD in response to this comment.**



**Commenter 6: Spring Airlines – Ou Shenghui – 20/04/2026**

**Comment # 6**

If at the time of the new AD issue, the PN 47145-347 or 47145-367 already exceed 22 years since the first flight, is there any credit that can be taken or any grace period?

**EASA response:**

**Comment noted.**

**There is no credit or grace period given in the AD. Please see under this [link the FAQ regarding compliance time extensions](#).**

**No change has been made to the final AD in response to this comment.**

**Commenter 7: ST Engineering Aerospace – Xavier Leong – 22/04/2026**

**Comment # 7**

We are from ST Aerospace Systems, supporting various operators in SEA (AirAsia, Vietnam airlines, Jetstar, CAL) for component repairs management.

We contacted AIRBUS on this but they have referred us back to EASA for more clarification.

Please see the questions below:

For paragraph (5), subject on Part(s) Installation:, we understand the sentence from:" For Group 1 and Group 2 aeroplanes: From the effective date of this AD, do not install on any aeroplane a THSA having a P/N listed in Appendix 1 of this AD, unless the part has not yet accumulated 22 years since its first flight (see Note 1 of this AD), or unless it has been determined that the THSA is classified as Type 1 (no corrosion) at the time of installation, in accordance with the criteria defined in the SB, and on the condition that, following installation, the THSA is inspected and, depending on findings, corrected as required by this AD (see Notes 2 and 3 of this AD).

Note 2: After installation of an affected part on an aeroplane, that aeroplane is considered a Group 1 aeroplane."

We require further clarification on this part of Paragraph 5., and



whether the interpretation in either a. / b. is correctly interpreted for: "Note 3: Removal of an affected part from an aeroplane and subsequent reinstallation of that affected part on the same aeroplane, accomplished during a single maintenance visit, is not considered as 'installation' as specified in paragraph (5) of this AD."

- a. Is Note 3 interpreted to let operators know that for the affected part that is removed during a heavy maintenance, where THSA is once removed and inspected, then re-installed is considered not as "installation", to lead operators in avoiding of redoing of task when task has already been completed? or
- b. Is note 3 intended to let operators know that in removing the affected part for inspection, the subsequent reinstallation cannot be the same affected part as the removed one?

We seek your kind cooperation to this subject.

**EASA response:**

**Comment noted.**

***The intend of Note 3 is that during a maintenance in which the THSA is removed (e.g. to replace or inspect something else and to allow better/easier maintenance), that is not considered as install or remove. Once the THSA is removed to accomplish the SB inspection, the potential corrective actions have to also be accomplished before re-installation is allowed. Therefore the Note 3 considers any removal and re-installation, without accomplishing the SB during that maintenance visit.***

***No change has been made to the final AD in response to this comment.***

**Commenter 8 : Jetstar Airways – Avneel Singh – 23/04/2026**

**Comment # 8**

Could you please consider including guidance for corrective action for Type II corrosion in the AD? The associated VSB 47145-27-16 includes corrective action for Type III corrosion. However, the VSB and the current AD 2012-0175R2 are silent on how Type II corrosion is to be rectified in shop.

We recommend including a simple statement along the line "...Type II corrosion is to be rectified in accordance with CMM 27-44-51 in shop".

**EASA response:**

**Comment noted.**

***Please see the answer to comment 5.***



*No change has been made to the final AD in response to this comment.*

