

## COMMENT RESPONSE DOCUMENT

**EASA PAD No.: 26-043**

**Published on 01 April 2026 and officially closed for comments on 29 April 2026**

### ***Commenter 1: United Air Lines – Jeff Shrader – 03/04/2026***

#### ***Comment # 1***

UAL's aircraft MSNs are not applicable to Airbus SBs A320-92-1116 Revision 02 or A320-92-1118 Revision 01 cited in PAD No. 26-043. The accomplishment of these SBs will cancel the repetitive inspection requirements of AOT A92N001-16, ATA 92 – Battery Retaining Rod Failure. UAL has no further comment on these inspections or terminating actions..

#### ***EASA response:***

***Comment noted.***

***Please see the answer to Comment 3.***

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

### ***Commenter 2: AMAC Aerospace Switzerland AG – Pavol Sikula – 07/04/2026***

#### ***Comment # 2***

Airbus SB A320-92-1116 Rev 02 applicability by MSN is listing only MSNs in the range 05182-07261.

SB explains that the issue is affecting only battery retaining rods manufactured since 2013.

Could we consider to add in the AD applicability section that AD affected parts are only the ones manufactured since 2013.

This will help us with evaluation of AD applicability on MSN bellow 05182, if rod has been not replaced.

#### ***EASA response:***



**Comment noted.**

*At the level of the rod, there is no serialization indicating the manufacturing date – therefore adding the manufacturing date in the AD is not beneficial.*

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

**Commenter 3: AMAC Aerospace Switzerland AG – Thomas Flour – 07/04/2026**
**Comment # 3**

The newly published PAD is Applicable to all MSN.

- “Applicability: [...] all manufacturer serial numbers (MSN).”

Although, Airbus AOT & SBs clearly identifies the affected aircraft (precise MSN list & Operators).

As well, The previously published EASA AD 2017-0161R1 reflects SBs A320-92-1116 & A320-92-1118 applicability.

- “Applicability: [...] (MSN) as listed in Airbus Service Bulletin (SB) A320-92-1116, and [...] A320-92-1118.”

Could the AD reflects the Airbus AOT / SBs Applicability?

**EASA response:****Comment not agreed.**

*While the AOT/SB published by Airbus identifies only those MSNs known to be affected, the AD also addresses additional aeroplanes that could potentially install an affected part and thereby “embody” the unsafe condition described in the AD.*

*EASA AD 2017\_0161\_R1 does not explicitly define “affected” and “serviceable” parts, but instead includes only a note regarding the latter. With the more precise definition of an affected part introduced in this (P)AD, a residual risk remains that an affected rod could be installed on an MSN not covered by the current AD. In such a case, and if applicability were limited to the MSNs listed in the SB, that rod could effectively be considered a serviceable part under the note in EASA AD 2017\_0161\_R1.*

*The extended applicability addresses this risk, particularly for the aircraft models enlisted in the SB eligible for conversion to other variants, where part rotation is more likely to occur. For this reason, the AD is not limited to the aeroplanes identified in the AOT/SB.*

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



**Commenter 4: IBERIA MAINTENANCE – María Castelo Noya – 07/04/2026****Comment # 4**

We would like to request clarification regarding the applicability of PAD 26 043, recently issued and intended to supersede EASA AD 2017 0161R1. In applicability section of PAD 26-043 it is stated that all manufacturer serial numbers (MSNs) of the listed Airbus A318/A319/A320/A321 models are affected by the proposed AD.

However, the General Visual Inspections (GVI) and the associated corrective actions mandated by PAD 26 043 are to be accomplished for Group 1 A/Cs in accordance with Airbus SB A320 92 1116, SB A320 92 1118, and AOT A92N001 16, where the applicability is limited to specific MSNs.

Considering the above, we would appreciate clarification on the following points:

- Could aircraft that are not listed in the applicability of the Airbus SBs or the AOT still be classified as Group 1 under PAD 26 043?
- If so, which inspection instructions should be followed for those aircraft?

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

***Yes, the instructions could be accomplished by MSN not listed in the SB. Please contact Airbus for more information.***

***Please see also note the answer to comment 3.***

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

**Commenter 5: Air New Zealand – Jacques Briones – 09/04/2026****Comment # 5**

Our understanding is that the proposed AD will supersede AD 2017-0161R1 and, at the same time, mandate Airbus SB A320-92-1116 Revision 02.

Air New Zealand would like to enquire whether EASA is aware that SB A320-92-1116 Revision 02 introduces an “additional work required” for aircraft previously inspected in accordance with an earlier revision of the SB.



While paragraph (7) of the PAD appears to provide credit for aircraft inspected and, where applicable, corrected in accordance with the original issue or Revision 01 of SB A320-92-1116, the PAD does not appear to directly address the additional work introduced by Revision 02. As stated in SB A320-92-1116 Revision 02, unless otherwise specified by an AD, the additional work is to be accomplished within 2 years from the release date of Revision 02. In this respect, the proposed AD may benefit from explicitly addressing the required action and associated compliance expectation for this additional work.

In addition, Air New Zealand would like to advise EASA that, during its evaluation of SB A320-92-1116 Revision 02, it identified discrepancies in the instructions associated with the additional work.

In particular, the accomplishment instructions for the additional work appeared to have similar intent and inspection targets to those of the original accomplishment instructions, which created uncertainty in interpretation.

Air New Zealand submitted a Technical Request to Airbus seeking clarification. Airbus' response, however, remained somewhat ambiguous. In the same exchange, Airbus also acknowledged that a procedural step for removal of the old label was missing. Airbus advised that the issues raised would be addressed in the next revision of the SB, understood to be Revision 03.

In view of the above, Air New Zealand respectfully suggests that EASA may wish to reconsider proceeding with the new AD until Airbus has released Revision 03 of SB A320-92-1116, or otherwise provide clear direction on how operators are expected to address the additional work introduced by Revision 02.

Please note that Air New Zealand is specifically highlighting SB A320-92-1116 as this is the service bulletin applicable to its fleet.

***EASA response:***

***Comment agreed.***

***The proposed credit paragraph was deleted and is not part of the AD anymore.***

**Commenter 6: Lufthansa Technik AG – Torsten Plüm – 09/04/2026**

***Comment # 6***

Please find below LHT CAMO's comment regarding PAD 26-043.



Firstly, the reason for superseding AD 2017-0161R1 is requiring future inspection iaw. latest revision of the SBs. However, we noticed that PAD is applicable to all MSNs, while former AD was only applicable to MSN listed in the SBs.

- a. It is EASA intention to check physically all A320FAM aircrafts for possible affected parts, as per AD paragraph (4)?
- b. Paragraph (4) mandates the inspection iaw. the instruction of the SB. Due to the limited SB MSN applicability, operators are forced to write their own Engineering Order – based on the SB instruction.
- c. (3) If (2) applies, it would lower the operators economic burden, if Airbus could expand the SB applicability and introduced an “inspection” CONF only.

**EASA response:**

**Comment noted.**

**A: No, the intention of the AD is not to physically identify for all aeroplanes if an affected part is installed or not. The determination of Group 1 or Group 2 aeroplanes can be accomplished using several methods, provided those can be relied upon and are satisfying the responsible NAA. If a Group 1 aeroplane is determined (has an affected part installed), indeed paragraph (4), and the other paragraphs applicable to Group 1 aeroplanes, have to be followed accordingly.**

**B: Comment noted.**

**C: See answer to comment 4.**

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

**Commenter 7: HK Express – Tian Cheong – 09/04/2026**

**Comment # 7**

HK Express has some comments regarding PAD 26-043.

Current PAD - Applicability:

Airbus A318-111, A318-112, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A320-251N, A320-252N, A320-253N, A320-271N, A320-272N, A320-273N, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers (MSN).

Affected part:



Any battery retaining rod having part number (P/N) D9241023700000, unless it has been determined that the part has not been installed on a battery support assembly with “SA” quality marking, and/or “SA” designation in the supplier P/N.

Our understanding:

- a. EASA’s intention is to require operators of the MSNs listed in the SB to redo the SB in accordance with the SB clarification on the “SA” identification. EASA does not intend all MSNs listed in the PAD applicability (even those that are not listed in the SB) to perform the SB.
- b. The definition of “Affected part” is intended to provide credit to MSNs that previously accomplished the SB by replacing the battery retaining rod or that have clear evidence showing they do not bear the “SA” identification.

Issue:

There is no clear statement that this PAD applies only to the MSNs listed in the SB. Combined with the current definition of “Affected part,” this could be misinterpreted to mean Group 1 aircraft are those with P/N D9241023700000 installed that have not been inspected for the “SA” identification. For example, a new A320-273N that is not in the SB but installed with P/N D9241023700000 would be applicable by this AD because it has not been inspected for the “SA” identification by the operator.

Comment / Recommendation:

Applicability:

Airbus A318-111, A318-112, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, manufacturer serial numbers (MSN) as listed in Airbus Service Bulletin (SB) A320-92-1116, and

Airbus A320-251N, A320-252N, A320-253N, A320-271N, A320-272N and A320-273N aeroplanes, MSN as listed in Airbus SB A320-92-1118.

Affected part:

Any battery retaining rod having part number (P/N) D9241023700000, unless as per the SB, it has been determined that the part has not been installed on a battery support assembly with “SA” quality marking, and/or “SA” designation in the supplier P/N.

**EASA response:**

**Comments noted.**

***Before accomplishment of the actions, the AD requires to identify whether an aeroplane is a Group 1 or Group 2 aeroplane. Following that, the applicable paragraphs have to be accomplished. If those have been accomplished before the effective date of the AD, the sentence “Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished:” provides credit for the actions accomplished iaw the***



*instructions mentioned in the AD. Further, paragraph (7) provides credit for inspections and corrective actions accomplished with previous revisions of the SBs.*

*If an aeroplane is determined as a Group 1 aeroplane and this MSN is not listed in the SB, the instructions have to be accomplished anyhow.*

*Please also note the answers to the comments above.*

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

**Commenter 8: JAL Engineering Co.,Ltd – Takashi KODAIRA – 16/04/2026**

**Comment # 8**

It appears that the applicability of PAD 26-043 has been expanded to cover all A320 family aircraft.

However, EASA AD 2017-0161R1 specifically applies only to aircraft affected by Service Bulletin (SB) A320-92-1116 or A320-92-1118.

Furthermore, the corrective and terminating actions described in the PAD reference compliance with AOT A92N001-16, SB A320-92-1116, or SB A320-92-1118.

This seems inconsistent with the broader applicability stated in the PAD, as these SBs cover only a subset of the fleet.

Given the nature of the defect, aircraft not affected by either SB A320-92-1116 or SB A320-92-1118 would presumably fall outside the intended scope of the PAD.

If the AD is issued with such a broad applicability, operators of unaffected aircraft could be required to conduct inspections without an available corrective action, which would pose a significant operational burden.

Could you kindly confirm whether EASA PAD 26-043 is intended to apply to aircraft not affected by SB A320-92-1116 or SB A320-92-1118?

If our understanding is correct, we would appreciate it if EASA could align the applicability of PAD 26-043 with that of AD 2017-0161R1 prior to issuing the final AD.

**EASA response:**

*Please see answer to comment 3 and 4.*

**Commenter 9: Interglobe Aviation Limited (Indigo) – Debapriya CHATTERJEE – 20/04/2026**



**Comment # 9**

Our comment is regarding para 7:

*Quote:* Credit: (7) Inspection(s) and corrective actions, accomplished on an aeroplane, before the effective date of this AD in accordance with the instructions of Airbus SB 92-1116 at original issue or revision 01; or Airbus SB 92-1118 at original issue, are acceptable to comply with the requirements of paragraphs (4) and (6) of this AD, as applicable, for that aeroplane. *Unquote*

Service Bulletins A320-92-1116 Revision 02 and A320-92-1118 Revision 01 introduce additional work requirements for aircraft that were previously inspected in accordance with earlier issues or previous revisions of these Service Bulletins. However, the Proposed Airworthiness Directive (PAD) states that credit is granted for compliance with the previous revision or the original issue of these Service Bulletins.

We request EASA to clarify whether aircraft that have been fully inspected and found compliant in accordance with any previous revision or the original issue of SB A320-92-1116 or SB A320-92-1118 are considered compliant with the PAD, without the need to accomplish the additional work introduced in the later SB revisions.

**EASA response:**

**Please see answer to comment 5.**

**Commenter 10: Singapore Airlines – Kianannn Soh – 23/04/2026****Comment # 10**

1. Superseded EASA AD 2017-0161R1 (See screenshot below) is only applicable to MSN listed in SB A320-92-1116 and SB A320-92-1118. So for those MSN that are not applicable previously i.e MSN not listed in SB and AOT, are they affected by this new AD?
2. As per Paragraph (7) Credit, Inspection(s) and corrective actions, accomplished on an aeroplane, before the effective date of this AD in accordance with the instructions of Airbus SB 92-1116 at original issue or revision 01; or Airbus SB 92-1118 at original issue, are acceptable to comply with the requirements of paragraphs (4) and (6) of this AD, as applicable, for that aeroplane.

Can EASA advise whether accomplishment of Airbus SB 92-1116 at original issue or revision 01; or Airbus SB 92-1118 at original issue, are also acceptable to comply with the requirements of paragraphs (5) of this AD?

3. If a new battery retaining rod (A) is used to replace an affected rod on aircraft with SA marking, can the same rod (A) subsequently be removed and installed on another aircraft and this aircraft is considered Group 2 aeroplanes?
4. Can those aeroplanes which accomplished SB A320-92-1116 R0 or R1 be considered Group 2 Aeroplanes?



5. Will EASA consider having Airbus to incorporate the requirement of Paragraph 2 into A320 AMM to accomplish GVI of affected part before next flight after a hard landing, or flight in severe turbulence?
6. Will new battery retaining rod supplied by the manufacturer comes with unique identification to help identify them from affected part?
7. AOT A92N001-16 Rev 02 mentioned that concerned battery rod P/N D92410237 is part of the assembly D92410241, however as per IPC the plate assembly PN are D9241073100200 and D9241073100000. Can advise which is the assembly PN that comes with the battery rod P/N D92410237 and whether **new** plate assembly will be supplied by Airbus and it will come with the battery rod P/N D92410237?

**EASA response:**

**Comment noted.**

- 1. Please see answer to comment 3.**
- 2. Please see answer to comment 5.**
- 3. Please note the update to paragraph (8) in the AD, which provides parts Installation requirements/conditions.**
- 4. No, the SB required by the AD is revision 02. Please see also the updated affected part definition in the AD.**
- 5. The amendment of the AMM is currently not required from EASA side.**
- 6. Provided parts might be re-labelled. The paragraph (8) of the AD requires that only part that are re-labelled can be installed after the effective date of this AD.**
- 7. According to the SB, referring to the various pictures provided (not shown in this CRD due to data sensitivity), the Airbus assembly P/N corresponds to the one referenced in the AOT. No discrepancies have been identified in the documentation cited within the AD. Should any inconsistency arise, please contact Airbus for further clarification.**

