

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-043R1

Published on 29 April 2026 and officially closed for comments on 13 May 2026

Commenter 1: A.C.E. Aviation Consultancy Expertise – Nicolas Episkopou – 29/04/2026

Comment # 1

In PAD 26-043R1 it states the applicability for all MSN.

We have 5 A/C A320-214 in our fleet and they are not applicable according to SBs A320-92-1116 Revision 02 or A320-92-1118 Revision 01.

We propose “Applicability” should reference to SB as well.

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 2: Japan Airlines – Takashi KODAIRA – 30/04/2026

Comment # 2



There appears to be an inconsistency between the applicability stated in the PAD and that of the referenced SB. The original SBs, A320-92-1116 and A320-92-1118, were limited to specific MSN.

However, the applicability of this PAD extends to all MSN, including those which are not covered by either SB. We believe that the actions required by this PAD should be aligned with the SBs A320-92-1116 and -1118, which specify applicability to particular MSN. Currently, the PAD's scope implies that all A320 series aircraft are affected, which may not be accurate. According to the PAD, the required actions refer to the SB procedures. Therefore, aircraft not affected by either of these SBs would be unable to comply with the PAD requirements.

To summarize;

Applicability: The SBs target specific MSN, whereas the PAD applies to all MSN, including those excluded from both SBs, resulting in a conflict.

Definition: The GVI should be performed following AOT A92N001-16, which shares the same applicability as the SBs. Consequently, aircraft not affected by either SB cannot comply with the PAD requirements.

Required Actions and Compliance Times: Corrective actions, including part replacements, must follow AOT A92N001-16 which is applicable to the same MSN as the SBs. Thus, unaffected MSN cannot follow these requirements.

Identification of Affected Parts: Identification should be conducted according to SB 92-1116 or -1118. Aircraft not affected by these SBs cannot fulfill this requirement.

Replacement of Affected Parts and Parts Installation: Even if not affected, identification by label as defined in the SBs is required. Aircraft not affected by either SB are unable to comply.

EASA response:

Comment noted.

See answer to comment 1.

Please also note that the instructions could be accomplished by MSN not listed in the SB. Please contact Airbus for more information.

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

Commenter 3: United Air Lines – Jeff Shrader – 30/04/2026

Comment # 3



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 1 and 2.

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

Commenter 4: Bangkok Airways Public Company Limited – Salisa Kittiwuttikrai – 05/05/2026

Comment # 4

Regarding AD 2017-0161R1, the applicability includes MSN listed in SB A320-92-1116, which is not affecting BKP Airbus fleet.

However, the applicability of PAD 26-043R1 has changed to include all MSN of the specified Airbus aeroplanes.

Could you please confirm whether PAD 26-043R1 is applicable to BKP Airbus fleet or not?

In case BKP has the affected part installed on aircraft, which document should we reference to perform the inspection and identification? Related SB and AOT did not include the MSN of our BKP Airbus fleet in the applicability.

EASA response:

Comment noted.

Please see the answer to Comment 1 and 2.

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

Commenter 5: Ryanair – Renan Zacche – 13/05/2026

Comment # 5



Ryanair has reviewed EASA PAD 26-043R1, issued on 29 April 2026, applicable to all A320 family aeroplanes, ALL manufacturer serial numbers (MSN). It was noted that a rod might be deemed as affected if the operator cannot confirm whether it was originally installed on a battery support assembly with “SA” marking and/or “SA” designation in the supplier P/N. This scenario may exist even on aircraft not listed within the AOT and applicable SB effectivity/applicability lists.

A. PAD paragraphs (1), (2) and (3) refer to a GVI and rod replacement as means of compliance. “GVI” per the PAD stands for a general visual inspection accomplished on the rods in accordance with AOT A92N001-16 and rod replacement instructions in accordance with the same AOT.

How can these requirements be achieved on aircraft not listed within the AOT effectivity? Can the AOT instructions be used on MSN’s not listed on its effectivity list?

B. PAD paragraphs (4), (5), (6) and (8) refer to actions to be carried out in accordance with “the applicable SB”.

Similar to Q1, how can these actions be performed on aircraft that have affected parts but are not listed within the SB applicability section? Can the applicable SB instructions be used on MSNs not listed on their applicability lists?

C. PAD paragraph (4) requires a detailed inspection “to identify their manufacturer” in accordance with the SB. Ryanair suggests replacing this with: “to identify if the quality stamp and/or the supplier part number designation on a battery support assembly is found marked with an “SA” manufacturer identification”, or equivalent wording, to ensure consistency throughout the PAD.

D. PAD paragraph (8) states that it is allowed to install an affected part, provided that it is new and that the ISB label is installed during rod installation in accordance with the applicable SB. However, the PAD defines a “serviceable part” as either:

- An affected part that is new (not previously installed), or
- a part eligible for installation that is not affected.

Considering that a new rod would not have been previously installed on an “SA” marked assembly, it would appear to meet the definition of a serviceable part and not an affected part.

Can EASA clarify whether a new rod must still be identified with an ISB label during installation in accordance with the SB instructions?

EASA response:

Comment noted.

A. Yes. Please contact Airbus in case further information are needed.

B. Yes. Please contact Airbus in case further information are needed.

C. Not agreed. The current wording is deemed adequate.



D. Based on the definition in the AD, a new part (that has never been installed) is indeed considered as a serviceable part. As described in paragraph (8) of this AD, the part has to be re-labelled afterwards.

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

