

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-087

Published on 21 July 2026 and officially closed for comments on 18 August 2026

Commenter 1: Etihad Airways – Borja Dosal Roiz – 21/07/2026

Comment # 1

See below Etihad Airways comments to PAD No 26-087:

- A. According to EASA PAD 26-087: *“(1) For Group 1 aeroplanes having the aeroplane reference date on or before 01 August 2026: Within 24 months after the effective date of this AD, accomplish a GVI of the affected part in accordance with the instructions of the ISB.”*

It would be advisable for EASA to specify in the final AD if a spare “Serviceable part” of ICP PN 727-7206-03 is required or not in order to carry out the Airbus Inspection Service Bulletin (ISB) A350-31-P067 defined in paragraph (1).

- B. According to EASA PAD 26-087: *“Airbus has also implemented production controls, ensuring that aeroplanes with an aeroplane reference date later than 01 August 2026 are delivered with parts not subjected to mechanical shock prior to installation.”*

Etihad will be delivered with a new A350 in September 2026. It would be helpful if EASA could state in the final AD that all new future Airbus A350 deliveries after 01-Aug-2026 can be considered “Group 2”.

By replacing the current definition “Group 1 aeroplanes are those having an affected part installed.” by “Group 1 aeroplanes are those having an affected part installed on aeroplanes having the aeroplane reference date on or before 01 August 2026.”

EASA response:

- A. **Comment not agreed. Paragraph (1) of EASA AD requires to accomplish an inspection. The replacement with a serviceable part must be performed only in case of findings, withing the compliance time as specified in the paragraph (2) of the AD. No changes have been made to the Final AD in response to this comment.**
- B. **Comment not agreed. Currently, there is only one ICP PN 727-7206-03 in the fleet, which is the affected part. This means that all A/Cs are actually Group 1, and therefore, a note stating the proposed definition of this comment would contradict the existing definition. The reason for having a Group 2 in this AD is a provision for any future P/Ns that would not be subject to the inspection requirement at installation. No changes have been made to the Final AD in response to this comment.**



Commenter 2: Qatar Airways – Muhammad Hamza Anwar – 22/07/2026

Comment # 2

With regards to subject PAD; QTR has following enquiries and would request your kind comments or review before the release of AD:

- A. Part(s) Installation: PAD allows installation of ICP P/N 727-7206-03 on any airplane provided that FIRE ICP passes inspection IAW Airbus ISB. Airbus has already revised the installation task for this ICP (reference MP Task A350-A-31-19-12-0B001-720A-A) that provides below warning:

IF ICP 245VM SHOWS SIGNS OF IMPACT (A BENT CASING OR A CRACKED FRONT FACE, FOR EXAMPLE), DO NOT INSTALL IT ON THE AIRCRAFT AND SEND IT TO THE SHOP.

ICP 245VM INCLUDES THE FIRE PUSHBUTTON SWITCHES. INSTALLATION OF A DAMAGED FIRE PANEL CAN CAUSE THE ABNORMAL OPERATION OF THE FIRE PUSHBUTTON SWITCHES.

EASA to review and advise if installation of ICP would be considered as legit for Group 1 and Group 2 airplanes provided installation is done as per above MP task for in-service A/C that have already been inspected as per ISB.

- B. Part(s) Installation: We have identified a typo on two places in this para. ICP is mentioned as IPC.

EASA to review.

EASA response:

- A. Comment noted. EASA is aware that new MP tasks are being created, however those instructions are not yet fully updated. Consequently, at the moment the correct instructions to be followed are those of the ISB. No changes have been made to the Final AD in response to this comment.**

- B. Comment agreed. The Final AD has been amended accordingly.**

Commenter 3: British Airways – Tom Wright – 22/07/2026

Comment # 3

BAW has reviewed PAD 26-087 and have some comments on the mandated inspections and their intent.

- A. In the reason section, one engine fire switch is mentioned as having self-released; since BAW have had this occur, we are assuming that it is the BAW A350 incident which is being referred to in this PAD. The subsequent investigation has only been able to assume that mechanical shock from a



point in the manufacture/assembly is a possible root cause for our switch release, it has not been definitive. We think the wording in the PAD is too conclusive and not representative of what the investigation has actually been able to determine and should be amended.

- B. We would also like to comment that for the BAW event the inspections required per SB A350-31-P067 would **NOT** have identified the faulty fire switch because there was no damage at all on our Fire ICP. The subsequent investigation also determined that there was no damage on the fire switch body. Suggesting that if any damage had occurred to that switch due to shocking it must have been while it was contained in its protective packaging.

BAW have suggested a physical test of the fire switches to compliment this damage inspection; we have been able to find 2 faulty switches using a test method. These were the incident switch and the APU fire switch in our full motion flight simulator. We would like to note that the APU switch in the flight simulator is never used so is representative of an in-service switch and will not have been worn due to repetitive use. I have attached the video of the suggested test which we think you should review and consider mandating.

EASA response:

- A. Comment partially agreed. The wording has been updated to reflect that mechanical shock could have contributed to the incident, rather than being the definitive cause. The Final AD has been amended accordingly.**
- B. Comment noted. The assumption at the time of this AD issuance is that in the vast majority of cases, internally damaged panels show external damage. However, this potential unsafe condition is still being investigated, and a further AD action may be needed. The test method proposed by BAW has not been validated by Airbus or the fire switch supplier, as this manipulation is difficult to standardize and risks damaging the mechanism. Broadening the use of such an inspection could ultimately have an adverse impact on fleet safety. No changes have been made to the Final AD in response to this comment.**

Commenter 4: China Southern Airlines Co. Ltd - Wang Jing – 23/07/2026

Comment # 4

This is an enquiry about item “Required Action(s) and Compliance Time(s):” -(3) Part(s) Installation.

Per the PAD “Part(s) Installation”(3) paragraph, it is required to inspect the ICP PN 727-7206-03 each time before part installation, in accordance with the SB 31-P067.

Adding the SB inspection criteria into the corresponding A350 MP task, making the MP content identified in accordance with the SB, as well as SB Number, is an acceptable AD compliance method.



Actually AIRBUS had confirmed the MP task will include the SB inspecting content in, by Webinar in APR 2026. Attached are the AIRBUS Webex material, for reference.

After the MP task update release, in case the AIRBUS A350 MP task wording has no words or SB number to make the AD compliance identified, it may lead airlines apply for an AMOC to comply with the AD.

Please consider adding that, Airbus A350 MP task revision may be one of the acceptable methods to comply with the AD (3) Part(s) Installation.

EASA response:

See response to comment # 2A.

Commenter 5: Virgin Atlantic – Tim Chambers – 27/07/2026

Comment # 5

Virgin Atlantic has some questions about the above referenced PAD

This PAD is proposing an inspection of the A350 Eng Fire ICP P/N 727-7206-03 for damage indicating a drop/shock, which could also indicate internal damage to the Eng Fire handle and result in an un-commanded IFSD. The PAD proposes that the ICP must be replaced within 6 months if there are any findings of damage.

This means that aircraft are permitted to fly for 6 months with damage that has been shown to result in un-commanded IFSDs. VIR would like to understand the rationale behind this decision as it makes us feel uncomfortable knowingly releasing an aircraft to fly with such a defect and this isn't something we recall seeing in an Airworthiness Directive previously. It will also put the Part 145 staff who do this inspection in a difficult position, as after working the inspection SB, they may have to re-install a damaged ICP per A350 Maintenance Procedure A350-A-31-19-12-0BZZZ-720Z-A and therefore ignore the following safety warning contained in that procedure.

WARNING: IF ICP 245VM SHOWS SIGNS OF IMPACT (A BENT CASING OR A CRACKED FRONT FACE, FOR EXAMPLE), DO NOT INSTALL IT ON THE AIRCRAFT AND SEND IT TO THE SHOP. ICP 245VM INCLUDES THE FIRE PUSHBUTTON SWITCHES. INSTALLATION OF A DAMAGED FIRE PANEL CAN CAUSE THE ABNORMAL OPERATION OF THE FIRE PUSHBUTTON SWITCHES.

Specifically, VIR would like to know the following:

- A. Is EASA/Airbus able to share how this is justified from a safety perspective? How probable is an un-commanded IFSD if damage such as that described in SB A350-31-P067 is found?



- B. Given an IFSD is more likely with damage to the Engine Fire ICP, has the effect on ETOPS certification of the aircraft been considered?
- C. If damage is found, has the possibility of internal damage to both fire handles been considered? This potentially could lead to a double engine un-commanded IFSD.

EASA response:

A. Comment noted. The replacement compliance time has been assessed and agreed basing on the risk assessment, supported by investigations results and in-service experience. In addition, it is consistent with the A320 EASA AD 2025-0274R1.

B. Comment noted. The risk assessment includes the consideration on the effect on ETOPS.

C. Comment noted. This EASA AD addresses this specific safety issue. However, this potential unsafe condition is still being investigated, and a further AD action may be needed.

No changes have been made to the Final AD in response to those comments.

Commenter 6: Turkish Airlines Inc – Ecem Son – 06/08/2026

Comment # 6

We have reviewed EASA PAD 26-087, and our evaluations are as follows:

- A. Part(s) Installation/AMM Task Feedback:** In the PAD, Fire ICP P/N 727-7206-03 is identified as the affected part. Group 1 aircraft are defined as those with the affected part installed, while Group 2 includes all aircraft that are not Group 1. Under section "Part(s) Installation: (3)", it is stated that Fire ICPs that pass the inspection in accordance with the ISB without any damage found may be installed on both Group 1 and Group 2 aircraft. The ISB is an aircraft Service Bulletin and is applied once per aircraft, containing no specific actions for spare components in stock. When carrying out an installation/replacement of a Fire ICP on any Aircraft at any other time, shouldn't a General Visual Inspection be applied again? Consequently, we believe that GVI steps should be added to the Airbus AMM TASK A350-A-31-19-12-0B001-720A-A Installation of the FIRE Integrated Control Panel (ICP) (245VM). Has the aircraft manufacturer, Airbus, been notified regarding this requirement?
- B. Reporting Requirement Discrepancy:** Under section "Reporting: (4)", the PAD specifies that reporting to Airbus is required even in the case of "no finding" after the inspection, noting that the inspection report included in the ISB serves as an acceptable compliance method. However, following the work steps outlined in the ISB, the inspection report is not to be filled out if there are no findings. There appears to be an inconsistency between the PAD requirement and the ISB instructions.
- C. Typo Error:** Under section "Part(s) Installation: (3)", "ICP" has been mistyped as "IPC".



EASA response:

A. Comment not agreed. Part(s) Installation requirement (3) mandates a concurrent general visual inspection (GVI) for any fire integrated control panel (ICP) with P/N 727-7206-03 during any installation. This requirement addresses the scenario described in this comment. No changes have been made to the Final AD in response to this comment.

B. Comment not agreed. The AD requirements take precedence over the SB instructions, and reporting is mandatory in all cases, including when no findings are detected. The inspection report attached to the ISB is an acceptable means of compliance with AD requirement (4). However, other methods of reporting the inspection results are also acceptable. No changes have been made to the Final AD in response to this comment.

C. See response to comment # 2B.

Commenter 7: Deutsche Lufthansa AG – Joerg Schowalter – 17/08/2026
Comment # 7

During the review and preparation of ISB A350-31-P067 (Rev00 - PREVENTIVE INSPECTION OF POTENTIALLY DAMAGED FIRE HANDLES ON ICP 245VM) and consequently PAD 26-087, several statements within the “Damage acceptance criteria” were identified whose practical implementation is challenging or even not feasible.

From Lufthansa Engineering point of view will the A350 damage tolerance criteria for scratches and lack of paint on dzus perimeter led to a confusion within the maintenance technicians who will perform this inspection because:

- The given criteria details are not manageable on wing (for instance: scratch width of less than 0.1mm => **evaluated by passing the tip of the finger on the scratch <= see APPENDIX pages of ISB -31-P067**).
- The finding rate for the lack of paint on dzus perimeter will be high because this kind of “damage” can also happen during normal ICP removal/installation when the technician will slip off with its screwdriver.....no drop down of the whole ICP!

In addition, ISB -31-P067 REV00 does not reflect the same effectivity as PAD 26-087 and proposed EAD! According to Airbus is a ISB revision for effectivity correction not planned/scheduled yet!

NOTE:

According to our records, till today, only a few (around 3...out of 31 for DLH fleet) fire ICPs are exchanged due to a failure/complaint! The rest were **installed since delivery from Airbus!** The possibility that one of these originally installed ICPs will be removed due to a “finding” according the “Damage tolerance criteria” (scratch and/or lack of paint) is high, even the ICP was never dropped in any case!



EASA response:

Comment noted. The inspection criteria have been defined based on in-service experience of returned panels. The operators should follow the ISB instructions, and in case of doubt seek the Airbus advice.

As per the information provided by Airbus, the ISB is currently under revision, and the updated effectivity shall cover all MSNs delivered prior to 01-Aug-2026. However, the requirements of an AD prevail, and operators must refer to the transfer of title date to determine whether the inspection is required. No changes have been made to the Final AD in response to this comment.

