

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-093

Published on 31 July 2026 and officially closed for comments on 14 August 2026

Commenter 1: MinRes Air – Bronagh Phelan – 03/08/2026

Comment # 1

With regards to PAD 26-093, MinRes Air have inspected the fleet, and several battery rods have had the identification markings worn away, therefore a GVI would be required within 4 months. However, AOT A92N001-16 is not applicable to the MinRes Air MSN.

Can the GVI method be updated from AOT A92N001-16 to AOT A92N001-16, MPD task 243851-01 or AMM task 24-38-51-280-001 (as applicable)?

After discussion with Airbus there is no plan to update AOT A92N001-16.

To enable compliance, PAD 26-093 para 1 and part 2 for MinRes Air aircraft the ICA requires amendment.

EASA response:

The AD requires using the AOT, and that allows the operator to accomplish a GVI using that instruction.

The AD paragraph (3) and (5) was amended accordingly, to include Airbus approved instructions.

Commenter 2: Air Guilin – Qxiang Zhang – 03/08/2026

Comment # 2

Air Guilin would like to comment PAD No. 26-093 regarding the identification method of affected parts.

According to Note 1 of the PAD, when no supplier P/N designation is found on the battery support assembly, the battery retaining rods installed on that battery support assembly are considered as affected parts.



Based on Air Guilin's fleet survey, for the battery support assemblies installed on our A320 fleet, no supplier P/N designation or manufacturer identification marking is available on the battery support assembly. However, the battery retaining rods themselves have identification markings, including supplier identification, Part Number (P/N D9241023700000) and manufacturing date code (see attached fig 1).

Air Guilin would like to request EASA clarification whether the identification information marked directly on the battery retaining rod can be accepted as an alternative method for determining the affected status, when the battery support assembly identification is unavailable.

For example:

- A. If the retaining rod marking identifies a supplier other than "SA" (e.g. "DA" in fig 1), can this information be used to determine that the retaining rod is not an affected part?
- B. If the manufacturing date code marked on the retaining rod is outside the production period specified in Airbus OIT 999.0096/26(09/2017 in fig 1), can this information be considered as supporting evidence that the retaining rod is not an affected part?

Air Guilin appreciates EASA's clarification on this matter to ensure accurate determination of affected parts and avoid unnecessary replacement of serviceable components.

EASA response:

Comment partially agreed.

A: Yes, this rod identification is acceptable to confirm a non-affected part.

B: Yes, this rod is not affected.

The definition section of the final AD has been amended accordingly.

Commenter 3: HK Express – Tian Cheong – 03/08/2026

Comment # 3

HK Express has some comments regarding PAD 26-093.

- A. Comment regarding Paragraph (5),
 - Quote: "... replace both affected parts of that battery support assembly with serviceable parts in accordance with the instructions of the SB."



- Recommendation: “... replace both affected parts of that battery support assembly with serviceable parts ~~in accordance with the instructions of the SB.~~” or “... replace both affected parts of that battery support assembly with serviceable parts in accordance with the instructions of the SB **or Airbus’s instruction of continued airworthiness (ICA)** .”
- Reasoning: Serviceable part could be other P/Ns that are not D9241023700000, and the replacement will be performed by IPC. Therefore, this compliance should not be stated explicitly ‘in accordance with Airbus SB’; rather, as long as the part is serviceable part— E.g. a serviceable D9241023700000 i.a.w the Airbus SB, or another serviceable P/N i.a.w the IPC

B. Comment regarding Paragraph (8),

- Quote: “For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install an affected part on any aeroplane, provided that it is new (not previously installed on any aeroplane) and that, within 24 months after 20 July 2026 [the effective date of EASA AD 2026-0130], it is identified with a label in accordance with the instructions of the SB or the OIT.”
- Recommendation: “For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install an affected part on any aeroplane, provided that it is new (not previously installed on any aeroplane). For Group 1 and Group 2 aeroplanes, **except those which have Airbus modification 162321 embodied**, it is allowed to install an affected part on any aeroplane, provided that within 24 months after 20 July 2026 [the effective date of EASA AD 2026-0130], it is identified with a label in accordance with the instructions of the SB or the OIT.
- Reasoning: The SB label shall not be applied to aircraft that have Airbus modification 162321 embodied. Therefore, the compliance shall be separated into 2 parts.

Furthermore, we would like to bring to EASA's attention that the relevant Airbus Service Bulletins (SBs) have not yet been revised, with the publication timeline pushed out to late 2026. As stated in the Airbus OIT: “Service Bulletins (SB) Reference [3] are being revised to include all MSNs with a two-rod configuration (pre-MOD Ref [4]). The updated A320 SB 92-1116R03 and A320 SB 92-1118R02 are scheduled for release in November 2026.”

EASA response:

Comment partially agreed.

A: The final AD has been amended to include “Airbus approved instructions for replacement.”

B: Not agreed, as per para (8), part of the corrective actions is to label battery rods (P/N) D9241023700000 deemed as not affected.

Commenter 4: Aegean Air - Tsampazi Dimitra - 03/08/2026

Comment # 4



We would like to request a clarification regarding the upcoming AD related to PAD 26-093.

We have identified a situation where, for certain aircraft (excluded from SB A320-92-1116 REV 02 effectivity), the installation history of the affected rod P/N D9241023700000 cannot be fully traced through our maintenance records.

In this case and based on the information included in the PAD and in AD 2026-0130, our understanding is that an aircraft not included in the SB A320-92-1116 REV 02 effectivity, is affected by AD 2026-0130 REV 00 and by the new AD, because it cannot be verified whether an affected rod has ever been installed on it during maintenance.

In such cases, If SB A320-92-1116 REV 02 is accomplished and no quality stamp or "SA" designation is identified, the SB identification label will be installed in accordance with the SB instructions.

Can this be considered as terminating action for the requirements of AD 2026-0130 and consequently of the upcoming AD?

In our understanding, in such cases described where the installation history of the relevant rods cannot be fully traced, terminating action would be to perform SB A320-92-1116 REV 02 AND concurrently replace all the rods to eliminate any possibility of having an affected rod installed.

After communicating with Airbus on the matter, they confirmed that for aircraft not in SB effectivity where rod installation history cannot be traced, the terminating action is to perform SB A320-92-1116 REV 02 and replace all rods with new, unaffected parts (P/N D9241023700000 from confirmed serviceable stock) as this eliminates any possibility of an affected rod remaining installed and satisfies the requirements of EASA AD 2026-0130, point (4).

However, If rod replacement is indeed required to terminate the AD requirements for such aircraft, we believe this is not explicitly stated in any of the related documents (SB A320-92-1116 REV02, AD 2026-0130 REV00, PAD 26-093) and the definition of terminating action therefore remains unclear.

We would appreciate your guidance on this matter.

EASA response:

Comment noted.

The terminating action, as described in paragraph (7) is indeed replacement and/or identification with a label. This means, either a replacement with a serviceable part has to be done followed by the relabelling or, if replacement was already performed and duly documented, only relabelling is missing to comply with the current AD.

In case, during the inspection, it is determined that the quality stamp and the supplier part number designation is not "SA", the battery rod installed on that support assembly has to be identified iaw para 6 instructions.

Attention: "if no manufacturer stamp" is identified, that rod is considered as affected, as per Note 1. Then the part must be replaced iaw 5.

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



Commenter 5: Heston Airlines – Vyantas Andrukonis – 03/08/2026

Comment # 5

We would appreciate clarification regarding the interpretation of **Note 1** in PAD 26-093:

"Note 1: If no supplier P/N designation is found on the battery support assembly, the battery retaining rods of that battery support assembly are considered as affected parts. Pending the identification of the manufacturer stamp of a battery support assembly, the battery retaining rods of that battery support assembly are considered as affected parts."

Based on the above wording, it is unclear how Note 1 should be applied when only one of the two identification markings is available.

Specifically, we would appreciate clarification on the following:

- A. If a battery support assembly has a supplier P/N designation that is **not "SA"**, but **no manufacturer stamp** is present, should the battery retaining rods of that battery support assembly be considered **affected parts**?
- B. Conversely, if a battery support assembly has a manufacturer stamp that is **not "SA"**, but **no supplier P/N designation** is present, should the battery retaining rods of that battery support assembly be considered **affected parts**?
- C. Could EASA provide a list of the possible supplier P/N designations and manufacturer stamp markings that may be found on the battery support assembly and used to determine whether the battery retaining rods are affected by this AD?

EASA response:

Comment noted.

A/B: EASA confirms that when one between the quality marking and the designation in the supplier P/N are not "SA" and the other one is not present, that part is considered as not affected.

C: EASA cannot provide a list of possible supplier P/N designations, which are not part of the unsafe condition identified.

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

Commenter 6: United Air Lines – Jeff Shrader – 04/08/2026

Comment # 6

Regarding - EASA PAD No. 26-093, issued 31 July 2026



Clarification needed; under Applicability, all manufacturer serial numbers (MSN) are indicated. And now, which is new, under Definitions, an OIT is indicated stating that SBs 92-1116R2 and 92-1118R1 will be revised to include all MSNs with a two-rod configuration.

A. Will the superseding AD have a new effective date that is conducive to the November 2026 release dates of revised SBs 92-1116R2 and 92-1118R1 which then starts the 24- month compliance time?

EASA response:

The AD does not need to be postponed pending SB availability; later SB rev can be used for showing compliance.

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

Commenter 8: Volotea – Ruben Trujillo – 04/08/2026

Comment # 8

For an aircraft outside SB 92-1146 effectivity, with unknown battery retaining rod replacement history, the aircraft cannot be positively classified as Group 2. However, the accomplishment instructions referenced by AD 2026-0130 are only applicable to aircraft within the SB effectivity. Please clarify the approved means of compliance for those aircrafts.

Additionally, since paragraph (2) of the AD indicates that the GVI must be performed, iaw AOT, in cases of a hard landing or flight in severe turbulence, we would like to request that GVI will be incorporated into the respective chapters of the AMM for inspections in these cases.

EASA response:

Comment noted.

As per group definitions no action is required for group 2 (MSN post MOD 162321) except part replacement limitations.

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.

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.

For the request concerning the AMM amendment, please contact Airbus.

Please also refer to the answer to comment #1.



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

Commenter 9: Asiana Airlines – Jack Hyung-Kyu Kang – 06/08/2026

Comment # 9

I am writing to request clarification regarding the definition of "Affected Part" in EASA AD 2026-0130 and PAD 26-093.

In EASA AD 2026-0130, an "Affected Part" is defined as any battery retaining rod Part Number (P/N) D9241023700000, except for those:

- Without an "SA" quality marking on the battery support assembly.
- Identified and Labeled in accordance with the SB.

However, PAD 26-093 introduces an additional condition:

- An airplane reference date prior to 01 September 2013.

Regardless of EASA AD 2026-0130, even if we apply this revised standard from PAD 26-093 to the Asiana Airlines (AAR) A320F fleet, several aircraft (MSN 7754, 7915, 7923, and 7985) are newly added to the effectivity. These aircraft were delivered after the effective date of EASA AD 2017-0161R1.

Could you please confirm if this change in effectivity and the inclusion of these MSNs is intentional?

EASA response:

The definition of the affected part, compared to the previous EASA AD 2026-0130, was initially amended to include the exemptions mentioned above. Meanwhile several reports were received which make the exemption criteria based on installation/manufacturing not applicable to the final AD. For this reason, the two criteria have been removed.

The final AD has been changed accordingly.

Commenter 10: Pegasus Airlines – Mehmet Mert – 07/08/2026

Comment # 10

While reviewing PAD 26-093 and Airbus OIT 999.0096/26, we noted that Airbus indicates A320 SB 92-1116 Rev 03 and A320 SB 92-1118 Rev 02 are planned for release in November 2026 and that these revisions will expand applicability and introduce updated instructions and flowcharts.



PAD 26-093, however, references SB A320-92-1116 Rev 02 and SB A320-92-1118 Rev 01 as the applicable compliance documents and is expected to become effective before the release of the revised SBs.

Could EASA please clarify:

- A. Whether operators are expected to initiate compliance actions using the currently referenced SB revisions (A320-92-1116 Rev 02 and A320-92-1118 Rev 01) together with Airbus OIT 999.0096/26.
- B. Whether the forthcoming SB revisions are considered only editorial/clarification updates or introduce new compliance instructions affecting accomplishment of AD requirements.
- C. Whether any operators should defer the one-time inspection and identification activities until release of the revised SBs, or whether compliance using the current approved references is fully acceptable.

Thank you for your clarification.

EASA response:

Comment noted.

A: The minimum revisions for compliance to the AD are Revision 02 for SB 1116 and Revision 01 for SB 1118. Later revisions are accepted for compliance to this AD.

B: EASA cannot anticipate the content of future Airbus publication(s). Nevertheless, it is not foreseen that the new revision will have additional work compared to previous revisions or the current OIT.

C: Not agreed. Actions are required within the CT as defined in the AD.

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

Commenter 11: Eurowings Technik GmbH – Jan Geerken – 10/08/2026

Comment # 11

After reviewing the PAD 26-093, we still have a few open questions.

In the previous Airbus OIT (999.0096/26 Rev. 00), Airbus announced that SB 92-1116 and SB 92-1118 would be revised. However, these upcoming revisions are not mentioned in the PAD. Furthermore, Airbus stated in a TechRequest that the new revisions of the Service Bulletins are expected to be published in Q4 2026.



Will the future AD take these revised Service Bulletins into account? If so, are you in contact with Airbus regarding the timely release of the revised Service Bulletins and about clarification of additional work?

Another point concerns the identification of affected parts. Previous inspections were considered sufficient to confirm the installed P/Ns. Based on the PAD, it is unclear whether previous inspections performed in accordance with SB 92-1116 Rev. 02 are still considered sufficient.

Thank you for your support and clarification.

EASA response:

Comment noted.

See answer to comments #10 A/B. The definition of affected part does not specify the means to determine whether it is an affected part or not. Therefore, if it was identified through a means or maintenance records, which can be relied upon, this is acceptable.

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

Commenter 12: easyJet Airlines Company Ltd – Selina Tesfaye – 10/08/2026

Comment # 12

Following the release of PAD 26-093, easyJet submitted a technical query to Airbus regarding the planned revision dates for **SB A320-92-1116 (CEO)** and **SB A320-92-1118 (NEO)**.

Airbus has advised that both service bulletins are currently being revised to include all MSNs equipped with the **two-rod battery retaining configuration (pre-MOD 162321)**. The updated **A320 SB 92-1116 Revision 03** and **A320 SB 92-1118 Revision 02** are currently scheduled for release in **November 2026**.

In light of this, easyJet would like to enquire whether EASA could consider aligning the release of the revised AD with the publication of **SB A320-92-1116 Rev. 03** and **SB A320-92-1118 Rev. 02**, should this be feasible.

EASA response:

See EASA replies to Comments #10 and #11.

Commenter 13: Air New Zealand – Jacques Briones – 11/08/2026



Comment # 13

In this PAD or even the current AD 2026-0130, there is no explicit statement/requirement for those aircraft embodied with SB A320-92-1116 (prior to Rev.02) or SB A320-92-1118 Rev.00.

Seeing that the AD is mandating Rev.02 and Rev.01 of the respective SBs, is it EASA's intention to embody these SBs regardless of if it was already carried out previously?

EASA response:**Comment noted.**

The minimum revisions for compliance to the AD are Revision 02 for SB 1116 and Revision 01 for SB 1118 as those introduced additional work compared to previous issues. No change has been made to the final AD in response to this comment.

Commenter 14: Interglobe Aviation Limited (Indigo) – Ashwin Kolhatkar – 11/08/2026
Comment # 14

With respect to PAD 26-093 Dt. 31 July 2026, we at Interglobe Aviation Limited (Indigo) would like to make the following submission:

Comment A - Paragraph (1):

As per the PAD a GVI is required on all Group 1 aircraft. The GVI is defined as the "General visual inspection (GVI) of a battery retaining rod accomplished in accordance with the instructions of Airbus Alert Operators Transmission (AOT) A92N001-16".

Since the AOT applies only to a small batch of MSNs, there will be cases where, a MSN is in group 1 but is not listed in the AOT.

In this context, to avoid any confusion, IGO suggest that Para 1 explicitly states as follows: **"Perform the GVI of each affected part in accordance with the instructions provided in the AOT, irrespective whether the MSN is included in the AOT or not."** This would ensure clear direction for operators regarding the inspection document to be followed.

It may also be worth noting here that, unlike the Service Bulletins, which are expected to be revised in November 2026 (Airbus OIT 999.0096/26 R0 refers), Airbus does not intend to revise the AOT to include all PRE MOD 162321 MSN.

Comment B - Paragraph (2):

In cases where a suspected hard landing is reported, but the recorded aircraft parameters are subsequently confirmed to be within the prescribed limits and, therefore, no hard landing inspection is required, please clarify whether the inspection of the Aircraft Battery Retaining Rods is still required under the AD requirements. We believe this scenario should be specifically addressed to provide clear guidance.

Comment C - Paragraph (6):

Please clarify whether an aircraft that previously had all battery retaining rods replaced with serviceable rods before issuance of this PAD, but where labels have not yet been installed in accordance with the SB/OIT, remains subject to the repetitive inspections of Paragraphs (1) and (2) until compliance with Paragraph (4) is achieved.

EASA response:

Comment noted.

A: Please see the answer to comment 8. It is not deemed necessary, to further detail in the paragraph, that the required actions are for all Group 1 aeroplanes, despite if the MSN is mentioned in the service instruction or not.

B: If it is not a hard landing, no post hard landing inspection are required. Anyway, until it is confirmed the landing was not a hard landing, no further flight can be done without having passed the inspection.

C: If all rods are serviceable parts (at the effective date of the AD), that aeroplane is considered a Group 2 aeroplane and the actions required in paragraphs (1) and (2) are not applicable. Still rods have to be relabelled iaw para 8 when re-installed.

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

Commenter 15: Spring Airlines – Lu Xukan – 11/08/2026

Comment # 15

EASA response:

We have some questions about EASA PAD No.: 26-093.

- A. The applicability section of the PAD does not cover A321-253NX aircraft. However, the PAD states that Airbus has confirmed A321-251NX is potentially susceptible to this unsafe condition, and A321-251NX has been added within the PAD applicability scope. Could you please advise why A321-253NX is excluded from the applicability, and how to determine whether A321-253NX is subject to this potential risk?



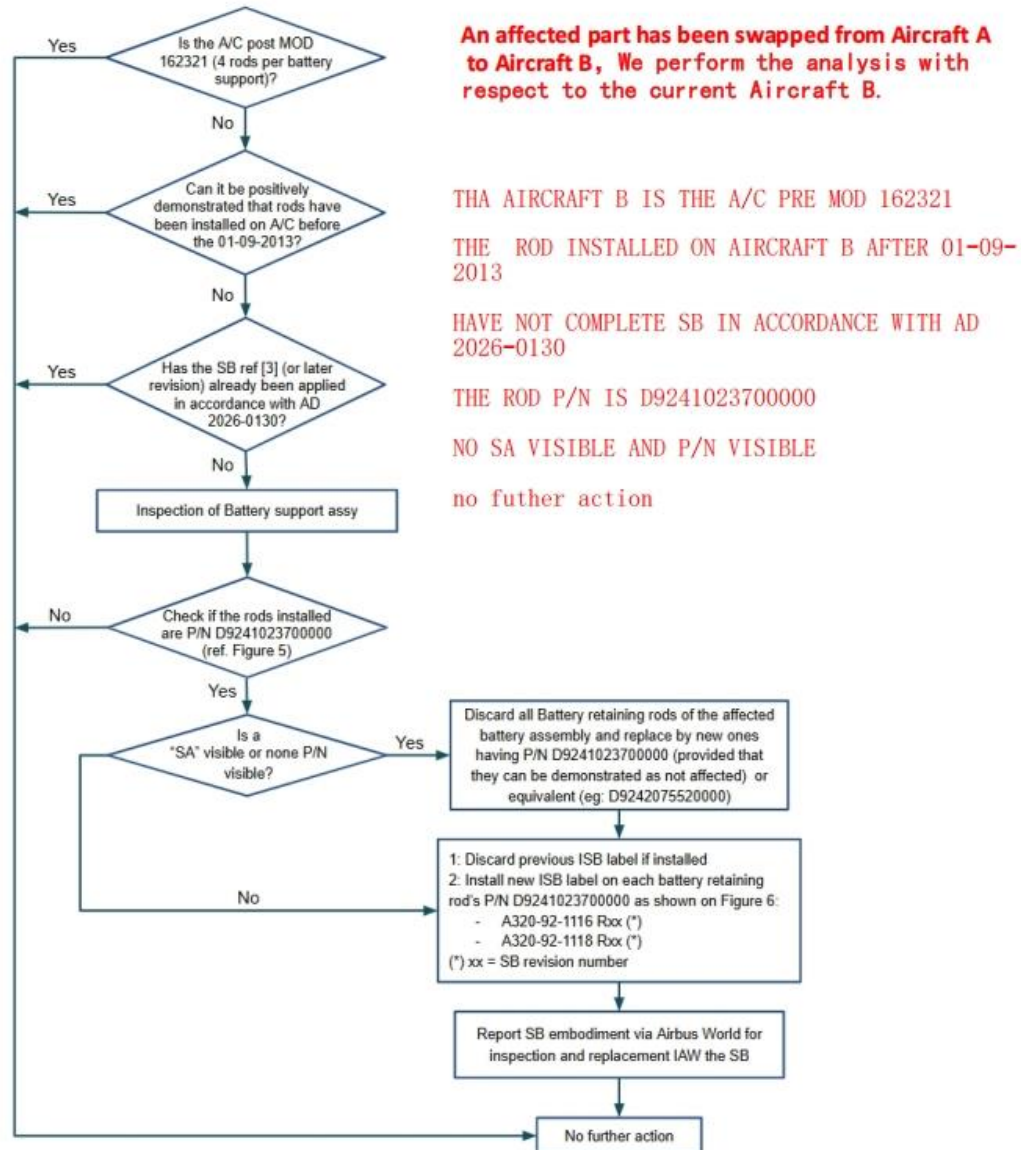
- B. The definition of affected parts within PAD 26-093 is: if no supplier P/N designation is found on the battery support assembly, the battery retaining rods of that battery support assembly are considered as affected parts. However, per SB A320-92-1116R2, assemblies without a part number shall be fitted with a label with no additional actions required, meaning they are defined as non-affected parts.
- C. As no further actions were required for part-number-free assemblies under the prior SB, these assemblies have been categorized as non-affected. Consequently, aircraft installed with these parts are out of our control.
- D. The visual inspection specified in PAD No.: 26-093 is based on AOT A92N001-16. The applicability of this PAD covers the configuration with four retaining rods, whereas all illustrations within AOT A92N001-16 depict the configuration with two retaining rods.
- E. Regarding the concern of roamed-over parts: if an affected part was previously roamed onto an assembly of an aircraft which bears no "SA" quality marking, has a supplier part number and no "SA" marking on the supplier part number, it will still be identified as non-affected upon completion of the current inspection. Therefore, extending the applicability for the purpose of mitigating risks arising from part roaming would not be effective.

Please help address these concerns and improve the publication of the AD as-needed.

Note 1: If no supplier P/N designation is found on the battery support assembly, the battery retaining rods of that battery support assembly are considered as affected parts.
 Pending the identification of the manufacturer stamp of a battery support assembly, the battery retaining rods of that battery support assembly are considered as affected parts.

- c. No further action in accordance with this Service Bulletin.
- 2. If the quality stamps and the supplier P/N designation is not found or do not show "SA" on the battery support ASSYs of batteries (FIN 2PB1 and FIN 2PB2):
 - a. Install the ISB label on the battery retaining rods of the battery support ASSYs of batteries (FIN 2PB1 and FIN 2PB2) in accordance with Ref. Task A320-A-92-XX-1116-01ZZZ-720Z-A.
 - b. No further action in accordance with this Service Bulletin.





EASA response:**Comment noted.****A: Applicability has been updated to include any models having an MSN pre-MOD 162321.****B/C: The AD prevails. To be noted that the new AD is not giving credit to previous AD, and a part identified as not affected per old AD has to be reassessed and confirmed as such.****D: Comment not agreed. The 4-rod configuration is criterion of exclusion as per Group 1 definition.****E: Comment noted. The evaluation was performed considering this possibility as well.****No change has been made to the final AD in response to this comment.****Commenter 16: HK Express – Tian Cheong – 12/08/2026****Comment # 16**

HK Express has more comments regarding PAD 26-093 as Airbus Airworthiness team requested us to directly send our comments to EASA.

Comment regarding the definition of AFFECTED PART,

- Quote: “..... -Has been originally installed on an aeroplane with an aeroplane reference date prior to 01 September 2013”
- Reasoning: In Airbus OIT, Airbus explained the intention is to capture the potential rod swapping. Airbus reconfirms that the affected rods were manufactured between September 1, 2013, and July 2016. If the AD intention is to require operator to inspect (either by SB or by document/maintenance record) to confirm the battery rods have not been replaced / swapped after the aeroplane reference date, then the exemption should be applicable to both ‘before Sep 1,2013’ and ‘after Jul 1, 2016’.
- Enquiry for rationale:
 - A. Why is the exemption condition for the Affected part only applied to aeroplane reference date prior to 01 Sep 2013 but not to aeroplane reference date after 01 Jul 2016?
 - B. Does EASA agree with Airbus that the Affected rods were manufactured between September 1, 2013, and July 2016? or does EASA believe the Affected rods were manufactured even after July 2016?
- Recommendation: ““..... -Has been originally installed on an aeroplane with an aeroplane reference date prior to 01 September 2013 **or later than 01 July 2016**”



Comment regarding paragraph (8),

- Quote: “...it is allowed to install an affected part on any aeroplane, provided that it is new (not previously installed on any aeroplane)...”
- Reasoning: If EASA and Airbus agree that the affected part was manufactured between 1 September 2013 and July 2016, then, effectively, there is no such thing as a NEW affected part in practice. Under the AD definition of the SERVICEABLE PART, a newly manufactured affected part (i.e., brand new, not previously installed on any aeroplane) is automatically considered a SERVICEABLE PART.
- Recommendation: **An affected part should not be installed on aeroplane, only a Serviceable part should be installed on aeroplane. The paragraph (8) should reflect this intention.**
- Enquires for rationale:
 - C. What is the difference between the NEW Affected part and the Serviceable part from EASA perspective?
 - D. What is the rationale for applying the SB label to NEW D9241023700000? This will cause further confusion in the future, unless the SB label after replacement is limited to aircraft MSN 5182-7261 (MSN delivered between Sep 1, 2013 and Jul 1, 2016).
 - E. Would EASA consider banning the swapping of D9241023700000 (e.g.: must use new D9241023700000) for aircraft MSN 5182-7261 (MSN delivered between Sep 1, 2013 and Jul 1, 2016)?

Comment in general:

- Recommendation: Consider using more definitions than just Affected part and Serviceable part, for example: AFFECTED PART (*D9241023700000*), UNSERVICEABLE PART (*D9241023700000 determined as bad part*), SERVICEABLE PART (*D9241023700000 determined as good part or other part numbers*).
- Reasoning: Most ambiguities arise from unclear or insufficient definitions.

EASA response:

A: Please see the answer to comment 9.

B: EASA agrees that affected parts were only produced during the mentioned timeframe, and this condition has been added in the AD.

C: A new affected part and an affected part that has never been installed on a battery support assembly with “SA” quality marking or designation in the supplier part number, is considered equivalent. Therefore, in the Affected Part definition this condition is exempted, while it is also part of the serviceable part definition.

D) After installation, that part will no longer be new, and then you need a way to identify it as good one

E) As soon as the rod D9241023700000 is confirmed serviceable, no reason to prohibit the swapping.



Commenter 17: ALL NIPPON AIRWAYS CO.,LTD – Yuichi Igarashi – 13/08/2026**Comment # 17****EASA response:**

ANA reviewed EASA PAD No. 26-093 which was issued on 31 July 2026.

In this review, ANA has the following queries and requests.

- A. ANA would like to correctly understand the reason why aeroplanes which have Airbus modification 162321 embodied are Group 2.
ANA concerns that Retaining Rod D9241023700000 which has quality defects of the material used during parts manufacturing could be installed to aeroplanes which have Airbus modification 162321 embodied. Is any action necessary for this case?
- B. ANA sincerely requests that EASA issues the AMOC excluding the aeroplanes which have Airbus modification 162321 embodied from the scope of this Required Action Step (1) to (6) in this AD.
ANA assumes that the AD including above contents will be released in the future. However, the compliance time of Repetitive Inspection(s): (1) may arrive before that. To avoid the above situation, ANA sincerely requests that EASA issues the AMOC Letter.
- C. ANA would like to confirm Terminating Action.
ANA understands that the applicability is expanded because of a solution for parts rotation of Retaining Rod D9241023700000 which has quality defects of the material used during parts manufacturing.
In addition, a Retaining Rod can be replaced individually in a battery support assembly. Thus, Retaining Rod D9241023700000 which has quality defects of the material used during parts manufacturing could be installed to airplanes / battery support assemblies without "SA" quality marking.
In this case, ANA believes that Airbus SB A320-92-1116 and A320-92-1118 should not be considered as Terminating Action of this issue.

Please advise whether our understanding is correct or not.

EASA response:**Comment noted.**

A: MOD 162321 installs rods with P/Ns different from those of the affected parts. However, it is true that interchangeability with the affected parts is permitted in accordance with the Airbus ICA. Nevertheless, the original unsafe-condition assessment is based on the possibility that one or both affected rods could fail, potentially causing the battery to slip. In a four-rod configuration, this risk is significantly mitigated, as the configuration would still provide twice the number of rods compared with the affected configuration and the likelihood of all four rods being replaced with affected parts is considered as low. Therefore, it was determined that no action is required on aircraft with MOD 162321 installed.



B: This is not needed, as aeroplanes that have this airbus modification embodied, are considered Group 2 aeroplanes and are therefore not required to perform Group 1 aeroplanes actions, except for the parts installation, when applicable.

C: Refer to EASA reply to Comment #15 E.

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

Commenter 18: Lufthansa Technik AG – Elke Hoffmann – 14/08/2026

Comment # 18

Following our review of PAD 26-093, we would appreciate EASA's and Airbus' clarification on the following points to ensure a more consistent and unambiguous understanding of the proposed requirements.

A. Determination of an affected part

Clear decision instructions or guidelines would be appreciated to ensure consistent interpretation during physical inspections.

More details or examples of acceptable and unacceptable configurations would be helpful. Experienced examples:

At the expected place of marking/stamping on the battery support assembly, the Part Number P/N of a double is visible, and it is without "SA" marking. It is not acceptable, because it is not the P/N of the assembly even though it is a marking without "SA".

"SA" marking can have multiple shapes (e.g. when handwritten or stamp). It should be stated more clearly how to handle ambiguous markings.

Suggestion:

It is highly recommended to give more clear instructions for as many as possible marking configurations to declare a support assembly and the rods as affected or not affected.

B. Comment on affected part/serviceable part/new part

- Usage of wording AFFECTED / SERVICEABLE / NEW part, as in the present AD, can lead to some misinterpretation.
- Our understanding of the intention of the AD is:
 - determine and find installed AFFECTED parts
 - replace installed AFFECTED parts with NEW parts
 - determine and find installed SERVICEABLE parts



- label installed SERVICEABLE parts with P/N D9241023700000
- parts with other than the above-mentioned P/Ns are considered serviceable parts without additional label.

Please consider

- changing definition of an AFFECTED part to more straight-forward wording (and not simply “...except ... has not been originally installed...” as stated in current document).
- changing the definition of a SERVICEABLE part to prevent misunderstanding when a serviceable part is called an “affected” part.
- introducing NEW part definition to avoid any misunderstanding about what is eligible for installation when a new part is called an “affected” part (“... An affected part that is new (not previously installed on any aeroplane), any battery retaining rod, eligible for installation in accordance with Airbus instructions, which is not an affected part. ...”).
- clarifying interrelation between SERVICEABLE or NEW parts with P/N D9241023700000 and parts with different P/N.

Suggestion:

AFFECTED part: A battery retaining rod having Part Number (P/N) D9241023700000 for which any of the following conditions apply:

- *originally installed on a battery support assembly with “SA” quality marking, and/or “SA” designation in the supplier P/N,*
- *installed on a battery support assembly where no supplier P/N designation is found,*
- *installed on a battery support assembly where identification is pending.*

Exclusion (any of the following conditions apply):

- *has been identified with a label in accordance with the instructions of the SB or of the OIT.*
- *has been originally installed on an aeroplane with an aeroplane reference date prior to 01 September 2013 (see Note 2 of this AD)*

SERVICEABLE part: A battery retaining rod

- *having Part Number (P/N) D9241023700000 which is not an AFFECTED part, or*
- *any battery retaining rod with different P/N, eligible for installation in accordance with Airbus instructions.*

NEW part: A battery retaining rod

- *having Part Number (P/N) D9241023700000 that is new (not previously installed on any aeroplane), or*
- *any battery retaining rod with different P/N that is new (not previously installed on any aeroplane), eligible for installation in accordance with Airbus instructions.”*

Summarizing:

Affected part to be replaced.



Serviceable part is to be left on the A/C with or without label depending on the P/N

New part is to be used as replacement parts.

C. Comment on Paragraph (8) “Parts Installation”

As Paragraph (8) says *“it is allowed to install an affected part on any aeroplane, provided that it is new (not previously installed on any aeroplane)...”*
Here it is misleading that text states it is allowed to install an affected part.

Suggestion:

To write *“it is allowed to install a battery retaining rod having Part Number (P/N) D9241023700000, that is new (not previously installed on any aeroplane)...”* (or use above mentioned “NEW part” definition).

D. Comment on Paragraph (4) “One-time Inspection of Battery Support Assemblies”

Intention of this paragraph is to check if an A/C really has an affected part or a serviceable part installed, if check of the documentation could not help exactly to determine the Group.

However, identification of the manufacturer of the battery support assembly might not be possible with a one-time inspection. Our experience is that support assembly part number or manufacturer stamps are missing in most cases.

We expect that new revision of the SBs will contain instructions to check the type of retaining rods and conclude the P/N from the shape (please see OIT 999.0096/26 Rev 00 for similar instructions). Current PAD instructions only allow check of the assembly to identify the manufacturer, but it does not allow determination of the P/N of the rods, however intention here is to check if an A/C has an affected or a serviceable part installed.

Suggestion:

Including identification of the battery retaining rods:

*For Group 1 aeroplanes: Within 24 months after 20 July 2026 [the effective date of EASA AD 2026-0130], accomplish a detailed inspection of each battery support assembly to identify the manufacturer of the battery support assembly **and/or to determine the P/N of the battery retaining rods in accordance with the instructions of the SB.***

E. Comment on paragraph (6)

Suggestion is to clarify that the quality stamp is present and identifiable on the battery support assembly but does not contain an “SA” manufacturer identification. This would help to clearly distinguish this condition from cases where no quality stamp or supplier part number designation is found.



Also, please note that the referenced SB currently appears to specify part replacement based on the presence of an “SA” marking. Clarification would therefore be appreciated regarding the relationship between the applicable SB criteria and the proposed AD provisions.

Suggestion:

If, during the inspection as required by paragraph (4) of this AD, it is determined that the quality stamp and the supplier part number designation of a battery support assembly are present and identifiable, but do not contain an “SA” manufacturer identification, within 24 months after 20 July 2026 [the effective date of EASA AD 2026-0130], identify with the applicable label each battery retaining rod having P/N D9241023700000 in accordance with the instructions of the applicable SB or other applicable Airbus instructions.

F. Comment on paragraph (7) “Terminating action”

The understanding is that the identification itself (acc. to para (4)) is not a terminating action for the GVI. Current AD text is understandable, but it does not fully avoid further misunderstanding, because after the identification process, now AD gives time for labeling of the rods. Therefore, even after it is proved that a not affected part (but having P/N D9241023700000) is installed, GVI shall be continued until labelling of the rod acc. to the instruction of the SB.

Suggestion:

Highlighting this fact with a Note within paragraph (7).

G. Comment on crediting already performed tasks

In case a new AD is issued, please consider adding sentence, that previously performed actions in accordance with AD 2026-0130 are proving credit for the new AD, if applicable.

EASA response:

Comment noted.

A: Comments agreed. As soon as a SA marking appears on the battery support whatever the shape, it is considered as an affected part. AD updated accordingly.

B/C: Not agreed. The AD does not require to replace affected part with new ones, but with serviceable ones, which could also be used.

The wording of the AD has been chosen to offer flexibility and to allow reusing used parts as long as confirmed not affected.

D: If the P/N of the retaining rod is not D9241023700000, the part would not be considered an affected part. The AD does not specify the means to determine the retaining rod PN.



Please refer to the exemption criteria in the affected part definition of the AD.

E: Comment partially agreed. The paragraph has been amended to improve clarity.

F: If, following the inspection in paragraph 4, it is confirmed and documented that no affected parts are installed, this can be considered evidence that the rods are not affected. The operator might then choose either to continue with the repetitive inspection or to initiate the inspection in paragraph 4, while being prepared to carry out paragraph 5 or 6, as applicable. Please note that paragraphs 1 and 2 may also lead to paragraph 3, in which case the operator should be prepared to proceed accordingly.

Nevertheless, to ease the AD, it has been introduced in para (6) the following: “For those battery rods, the repetitive inspection as per (1) and (2) is no longer required.”

G: Actions accomplished before the effective date of this AD fall under the standard sentence “Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished”. Determination whether a part is affected or not is anyway required.

Commenter 19: Air New Zealand – Jacques Briones – 20/08/2026

Comment # 19

A. A320CEO MSNs:

1. Credit is not clear for MSNs previously inspected (iaw AOT) to comply with the superseded AD 2017-0161R.

In Air NZ case, we had our a/c ZK-OXC to OXL previously complied with. However, it seems the intention of this new AD, based on its wording (Para 1–3), is to do all the inspections again every 4 months, and after a hard landing or flight in server turbulence. We understand that the applicability was extended to all A320CEO MSNs, which we intend to do the inspections to our MSNs outside that mentioned a/c. However, we do not quite fully understand why the operators will do another repeat inspection for those a/c mentioned above, especially that the terminating action (SB A320-92-1116 Rev.01) was already carried out to those a/c. This leads me to the second point below.

2. Credit is not clear for MSNs previously embodied with the terminating SB A320-92-1116 Rev.01, in Air NZ case, ZK-OXC to OXL.

We understand that the SB Rev.01 may have missed some important steps hence Rev.02 introduced the ‘Additional Work Required’, however the AD is not very clear about this aspect.

Also, we had confirmation from Airbus that the instructions of the ‘Additional Work Required’ in SB A320-92-1116 Rev.02 has an error as well and will be fix at Rev.03.



Perhaps it was best holding off the release of the AD on subject until the release of SB Rev.03.

Also, why can't operators skip the repeat inspections for those a/c that have had terminating actions carried out?

B. A320NEO MSNs:

Extending the applicability to the A320NEO, in Air NZ's case, ZK-NHA to NHF, has proven to be very difficult to comply with this AD and close to impossible without EASA and/or Airbus active guidance/support.

1. The repeat inspections (Para 1-3), iaw with the AOT is problematic for our A320NEO a/c due to these a/c are post MOD 162321, meaning these have 4 retaining rods in each battery. However, the AOT's instructions and illustrations are intended for configuration with only 2 retaining rods in each battery (pre-MOD 162321).
2. The same situation for the terminating action iaw SB A320-92-1118 Rev.01 (Para 4-7) where it contains instructions and illustrations intended for configuration with only 2 retaining rods in each battery.

C. Possible Solutions/Options

From an operator's standpoint, we acknowledge that EASA released PAD No. 26-093 indicating that the AD on subject will be superseded and exceptions in the applicability.

At the same time, we also acknowledge that Airbus released OIT 999.0096/26 providing info of future changes in the SBs including the exceptions which looks to line up with the PAD.

However, none of these documents will solve the dilemma that Air NZ is currently in as far as the AD on subject is concerned.

And due to that requirement of 4-month repeat inspection, Air NZ needs to put a plan/action in place as soon as possible.

Some possible solutions/options are as follows with direct assistance from EASA and/or Airbus:

1. EASA and/or Airbus will release an approved data that provides instructions on how to do the repeat GVI for a/c having configuration with 4 retaining Rods.
2. EASA and /or Airbus will release an approved data that provides instructions on how to carry out the terminating action for a/c having configuration with 4 retaining Rods.



3. Since both items 1 and 2 are technical deviations to the requirement of the AD, can EASA please release a Global AMOC (free of charge) for this solution?

4. As another option, Air NZ would like to request EASA to use the OIT 999.0096/26 and, based on this OIT, exempt those MSNs with post MOD 162321 from complying the AD on subject.

And since, this is also a technical deviation, Air NZ will also request for EASA to release a Global AMOC (free of charge) for this action.

5. Another option is for EASA to consider releasing an ADCN to cancel the AD on subject and wait for the release of the new AD.

EASA response:

Comment noted.

A.1.: The terminating action, as described in paragraph (7) is indeed replacement and/or identification with a label. This means, either a replacement with a serviceable part has to be done followed by the relabelling or, if replacement was already performed and duly documented, only relabelling is missing to comply with the current AD.

A.2.: Please see the answer regarding the terminating action above. The error in the SB does not constitute an error which hinders the application of the SB, therefore it is not necessary to await the new Revision issuance.

B.1.: Please see the Group definition in the SB. Those aeroplanes having mod 162321 embodied are considered Group 2 aeroplanes.

B.2.: See above.

C.1.: Those aeroplanes having a 4 retaining rod configuration are Group 2 aeroplanes.

C.2.: Not needed, as those are not affected by the unsafe condition addressed by this AD.

C.3.: Not needed, as stated above.

C.4.: See Group definition in the AD.

C.5.: Not needed, as explained above.

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

Commenter 20: Air Xizang – Yan Xiaolong – 20/08/2026



Comment # 20

In PAD 26-093, the first exemption condition still retains the word “not”: “Has not been originally installed on a battery support assembly with “SA” quality marking, and/or “SA” designation in the supplier P/N”.

This negative wording reverses the intended exemption logic and directly contradicts Note 1 of the same PAD. Unlike the other two positive parallel exemption conditions (SB/OIT label & pre-2013 aircraft date), this clause currently produces opposite and inconsistent compliance judgment.

The only required correction is to delete the word “not”, so that SA-qualified battery support assembly rods can be properly exempted, fully aligning with the AD’s engineering intent and Note 1/Note 2.

EASA response:**Comment not agreed.**

The unsafe condition described in the AD is actually on battery retaining rods manufactured by SUDAERO. Therefore the exemption applies to those which have never been installed on battery support assemblies with “SA” marking, as those would not be part of the unsafe condition.

Therefore, the way it is written does adequately address the unsafe condition.

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

