

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-101

Published on 07 September 2026 and officially closed for comments on 05 October 2026

Commenter 1: TAP Air Portugal – Margarida Almeida Azevedo – 08/09/2026

Comment # 1

We were aware that this AD would come up but we were expecting to be able to accomplish it in either our 6-year C-check or the 12-year C-check. This is important because the modification is very time-consuming and requires opening a lot of access panels that are not normally opened during a regular C-check.

We already performed the 6-year C-check for every affected MSN we have, and the last 12 year C-check will only take place in 2032.

Since the AD indicates that the modification should be applied in 61 months, the limit date to apply the modification will be around September/October 2031.

We would like to know if there is any chance that EASA would consider a larger time limit to apply the modification so that we can apply it on our 12 year C-checks (which will end in the beginning of summer of 2032)?

Thank you in advance for your help and understanding.

EASA response:

Comment not agreed. The defined compliance time has already considered margins to allow all produced aircraft reaching their first C check to restore the compliance of the design.

EASA reminds that EU operators, in case of urgent operational needs, can request from their National Aviation Authority (State of Registry) a temporary exemption under the provisions of Article 71 of Regulation (EU) 2018/1139, or an AMOC process (proposing compensative measures) could also be engaged.

No changes have been made to the Final AD in response to this comment.

Commenter 2: Delta Air Lines Inc. – Alanah Buinauskas – 24/09/2026

Comment # 2

Can you please clarify what the below “Reserved” section of PAD 26-101 is for? Will there be a new modification requirement upon publication of the AD?

Required Action(s) and Compliance Time(s):

Required as indicated, by this AD, unless the action(s) required by this AD have been already accomplished:

Modification:

- (1) Within 61 months after the effective date of this AD, modify the aeroplane in accordance with the instructions of Airbus SB A330-32-3306.

(2) [Reserved].

EASA response:

Comment noted.

This is a standard practice, established for a while.

Paragraph (2) is an editorial ‘trick’ to allocate a paragraph number to the single/first requirements of the AD.

In case of revision of the AD (e.g., adding a paragraph (2) listing acceptable methods of compliance), the above will allow keeping the initial requirement listed as paragraph (1), which is expected to ease tracking AD requirements to actions already accomplished on a specific aeroplane.

No changes have been made to the Final AD in response to this comment.

