European Union Aviation Safety Agency

# COMMENT RESPONSE DOCUMENT

**EASA PAD No.: 26-109**

**Published on 18 September 2026 and officially closed for comments on 16 October 2026**

## *Commenter 1: FedEx – Brian Moore – 16/10/2026*

*Comment # 1*

References:

/A/ EASA PAD 26-109, Issue date 18 September 2026

/B/ Airbus SB A300-57-6126 Revision 00, dated 10 July 2026

In response to Ref /A/ PAD, FedEx offers the following comments:

1. The proposed Airworthiness Directive (AD) will be effective for sixty-seven (67) A300-600 model airplanes currently on the FedEx Op Spec.
2. FedEx has determined that the inspection threshold and repeat intervals defined in Ref /A/ and /B/ will not fit within our planned scheduled maintenance checks. Therefore, there will be an impact on the available lift. FedEx requests EASA and Airbus extend the 550 flight cycle or 24-month grace period and threshold and the 550 flight cycle repeat interval periods to 30 months to align with FedEx C-check cycles.
3. The proposed AD inspections do not require special inspection techniques, training or tooling outside the resources of FedEx.

***EASA response:***

1. ***Comment noted. No changes have been made to the Final AD in response to this comment.***
2. ***Comment noted. EASA acknowledges the operator's request to extend the 550-flight-cycle / 24-month inspection threshold and the 550-flight-cycle repeat interval to 30 months to align with scheduled C-checks. However, this request cannot be accepted. The inspection thresholds and intervals mandated in PAD 26-109 result from the analysis of the reported MLG Rib 5 forward lug condition, including assessment of consequences and probabilities at aircraft level and determination of the minimum safety margin required to maintain an acceptable level of safety. The repetitive inspections constitute preventive corrective actions when necessary to address an unsafe condition. Because these intervals reflect the safety margin established through the required risk assessment process, they cannot be extended to accommodate operator maintenance planning considerations.***
   ***No changes have been made to the Final AD in response to this comment***
3. ***Comment noted: No changes have been made to the Final AD in response to this comment.***

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