

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-022

[Published on 30 January 2025 and officially closed for comments on 27 February 2025]

**Commenter 1: Italia Trasporto Aereo S.p.A. – Francesco Chiappetta – 31/01/2025**

### Comment # 1

Please, ITA Airways (ITY) brings to your attention that the Variation in ref. A) does not contain new and/or more restrictive tasks and limitations but it provides instructions and airworthiness limitations following embodiment of MOD 209185 - GENERAL - A330 FAMILY LIFETIME EXTENSION - CERTIFY EXTENDED SERVICE GOAL (ESG) ON A330-200/300 ENHANCED (SB ONLY).

ITA Airways kindly asks a clarification about that.

Please be informed the ITA Airways took note and already updated its own AMP Introduction to acquire the mandatory instructions and airworthiness limitations about the MAINTENANCE PROGRAM PUBLICATION TRIGGER condition PRE MOD 209185 / POST MOD 209185 for A330-200 fleet iaw the Ref. A).

### **EASA response:**

***Comment agreed. No Final AD will be published, and the PAD will be withdrawn***

**Commenter 2: Delta Air Lines – Gabriel De Jesus Exclusa – 07/02/2025**

### Comment # 2

#### **Comment A**

#### Commenter Request

Delta request not to issue an AD to mandate the A330 ALS Part 5 Variation 4.1.

#### Request justification



The reason for this request is because the A330 ALS Part 5 Variation 4.1 does not have new and/or more restrictive task and limitations. Variation 4.1 adds MOD 209185 (Extended Service Goal, ESG) referring to the extension of the Design Service Goal (DSG) of the A330-200/300 POST 49144 aircraft. No other changes were made to Variation 4.1. This change is less restrictive as it allows operators to extend operations past the previous limit of 33k FC/100k FH and should not be mandated by an AD.

## **Comment B**

### Commenter Request

Delta request for clarification to the Reference Publications Section statement, “The use of later approved revisions of the abovementioned document, or of an ALS revision which includes the content of the above-mentioned document, is acceptable for compliance with the requirements of this AD.”

### Request justification

The reason for clarifying this statement is that when Airbus publishes a new variation of ALS Part 5 Rev 04 (Var 4.1 or later), it will not require an AMOC. Airbus could issue a new variation that may or may not change the content that was revised in this variation. There has been other ALS Parts (Part 3, Part 4...) variations that changed the contents of a task being mandated by an AD for the previous variation.

1. What is meant by “which includes the content of the abovementioned document”? Does this mean if the content is exactly the same, it is acceptable to be used? If it’s not exactly the same (example: Task X was updated with revised limits, applicability, inspection type, etc... in a later revision or variation), is it or is it not acceptable to be used?
2. What is meant by “The use of later approved revisions of the above-mentioned document” when the document is a variation? Is this targeting A330 ALS Part 5 Rev 04 or A330 ALS Part 5 Variation 4.1 rev 02 (This is typically published as variation 4.1 issue 02). Is an issue to a variation or revision considered as a later approved variation or revision, respectively?

### List paragraphs that change; describe (nonobvious) changes

Reference Publications Section

### **EASA response:**

#### **2A) See EASA answer to Comment 1**

***2B1) When a new Revision (N) of an Airbus ALS document is published, it usually indicates that it includes certain variations (typically, all the variations issued since the previous Revision (N-1)). The statement above clarifies that, with no further review from the Operator, using that later Revision (N) is acceptable for compliance with, e.g., the AD mandating any Variation issued after the ALS revision (N-1) publication.***

***To be noted that if the new Revision (N) includes no new/more restrictive tasks, such Revision (N) would not trigger the publication of an AD.***



***2B2) That sentence must be read as “Any reissuance of the “Variation”, which could be tracked by issue number, amendment, correction etc, is acceptable for compliance.***

***To be noted that the sentence “later approved revision” is the standard wording used in EASA AD to make reference to re-issuance of referenced documents, whenever applicable.***

