

COMMENT RESPONSE DOCUMENT

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Commenter 1: Avalon Aero Technical Services Ltd – 27th July 2026

Comment # 1

The PAD appears to imply that all operators, irrespective of operational category, are required to comply with the requirements of ISB 05-011. However, based on previous discussions with the CAA, it was understood that Part 26.370(ii) is only applicable to aeroplanes operated in accordance with Annex IV (Part-CAT) to Regulation (EU) No. 965/2012 and certified to carry 30 passengers or more, or having a payload capacity greater than 3,402 kg (7,500 lb).

Furthermore, with respect to compliance with Part 26.370(i), my understanding is that BAE AOM 25-014V-1 records the UK CAA's acceptance that, for the BAe 146 and Avro RJ aircraft, a fatigue and damage tolerance evaluation in accordance with JAR 25.571 Change 7, 14 CFR §25.571 Amendment 45, or an equivalent/later amendment, already exists.

The inspection programmes and associated procedures resulting from this evaluation are published within:

- MRBR Appendix H for aircraft operating up to the Airframe Airworthiness Limitations Before Life Extension Programme, as defined in AMM 05-10-01; and
- SSID for aircraft operating up to the Airframe Airworthiness Limitations Landing Life Extended, as defined in AMM 05-10-02.

The applicable documents are MRBR Appendix H Revision 28 and SSID Revision 7.

CAA response:

The CAA agrees with the comment and the general understanding of the following sub sections of Part 26.370:

- *Part 26.370(a)(i) - MRBR Appendix H and SSID satisfy the damage tolerant inspection programme element of this section, as they embody the approved Damage Tolerance Evaluations (DTEs) arising from the aircraft certification basis and subsequent life extension work. These requirements are mandated through the Airworthiness Limitations contained within AMM Chapter 5.*
- *Part 26.370(a)(ii) – This part is satisfied through the adoption of the latest OCD and REG introduced by SB 05-011 which further expands into SB 05-012 & SB 05-014 introducing new and revised maintenance actions.*

The regulation sub section Part 26.370(a)(ii) does state that it is intended for aeroplanes operated in accordance with Annex IV (Part CAT) and so by inference, it does not apply to aeroplanes which are not operated under Annex IV (Part CAT).

No changes have been made to the Airworthiness Directive in response to this comment as it pertains to an understanding of the regulation rather than any technical content of the AD.