Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

T.O.C. USE BOOKMARKS TO NAVIGATE

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IG 90 AGENDA DRAFT 00

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

IG 90 AGENDA DRAFT 00

90-01: Introduction / Administrative Remarks

Item Lead: MMEL IG Industry Chairman

IG 87:

Receive nominations and hold elections for the positions of –

IG VICE CHAIRMAN: Don Reese (AAL) nominated and elected.

MEETING SECRETARY: No nominations received; Tom Atzert (UAL) volunteered to continue to serve in this role for now.

IG 88:

Nominations and hold elections for the position of MEETING SECRETARY.

Tom Atzert is able to continue as interim Meeting Secretary until August 2012 and then will no longer be available.

a) A Volunteer or Nominee is requested. (Open)

Request for nominations was put forth for Tom's spot operating the overhead projector. Todd Schooler (Cessna) was nominated and accepted, Todd will take over the duty at the MMEL IG 90 next April.

Request for nominations for other positions was submitted. No volunteers came forth. Discussion was to continue to seek volunteers and it was proposed that the term of service be extended.

IG 89:

ACTION: Nominations and hold elections for the position of VICE CHAIRMAN.

Minutes:

a) Tim Kane (Industry Chairman / Jet Blue) stated he was attempting to get feedback from several groups as whether or not the chair positions should be extended. He stated he wanted to hold off on nominations until some decision on the tenure was resolved.

   Follow up:
   - Tim Kane -MMEL IG Chairman (JetBlue) and Don Reese –MMEL IG Vice Chairman (American Airlines) both agreed to extend their terms for one year.
   - New elections for the position of VICE CHAIRMAN will be required in 1st quarter 2014. Don Reese (American Airlines), will assume the position of MMEL IG Chairman in August 2014.
   - The term extensions were voluntary and no changes to term limits are proposed at this time.

b) Tim Kane (Industry Chairman / Jet Blue) directed group attention to the MMEL agenda coordination process document where it was listed that Chairman will have agenda minutes available two weeks before next scheduled meeting.

   - Tim Kane (Industry Chairman / Jet Blue) stated that was not accomplished this time and he outlined some remedies he intends to pursue to preclude this happening again. Tim stated he will attempt to ensure minutes are on time.
     Note: Discussion on remedies continued in next agenda item.

(Continued)

Agenda for MMEL IG 90

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90-01: Introduction / Administrative Remarks (Continued)

- The coordination document calls for a teleconference call prior to scheduled meeting. The conference call had not been in practice by previous administrators and might be considered optional.

IG 90:

ACTION: Nominations and hold elections for the position of;

LEAD: MMEL IG Industry Chairman

- INDUSTRY CHAIRMAN (1st quarter 2014)
- INDUSTRY VICE CHARIMAN (1st quarter 2014)
- RECORDING SECRETARY (1st quarter 2015)
- MEETING SECRETARY (1st quarter 2015)

IG 90 AGENDA DRAFT 00

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-02: MMEL IG/FOEB Calendar

Objective: Keep the calendar current.

Item Lead: MMEL IG Industry Chairman

Standing Action (Ref. IG-FOEB Calendar Rev. 89)

a) IG Members are to review the MMEL IG/FOEB Calendar and advise the MMEL IG Industry Chairman of any changes or updates – Tim.Kane@jetblue.com

Action Item: **IG Members** are requested to consider hosting IG meetings.

IG Chairman - Align calendar with the following updates provided .

2012
DC-3 FOEB: Date set as 19 Sept. To held in Long Beach, CA.
IG 88: Dates as set 7-8 Nov. Hosted by UPS in Louisville, KY,
Electronic MD-11 FOEB: No dates as yet but requested to remain on the calendar as 2012 event.

2013
IG 89: Date set as 9-10 Jan. Hosted by US Airways in Phoenix. AZ.
IG 90: Dates need to be adjusted to Wed, Thurs, 17-18 April. Hosted by Cessna in Wichita, KS.
IG 91 - OPEN
IG 92: Dates are set as 23-24 Oct. Hosted by FAA in Washington, DC.

IG 87:

2012
MD-11 FOEB: Electronic set for 17 Oct, 2012
DC-3 FOEB: will move to March, 2013
IG 88: Dates as set 7-8 Nov. Hosted by UPS in Louisville, KY

2013
IG 89: Dates as set 9-10 Jan. Hosted by US Airways in Phoenix. AZ.
IG 90: Dates as set 17-18 April. Hosted by Cessna in Wichita, KS
Note: Cessna will arrange a group factory tour.
IG 91: Kevin Peters (FDX) proposed that the group consider coming to the FedEx World Headquarters in Collierville, TN which is east of Memphis. He stated he will look into rates and transportation options. Greg Janosik (AFS 240) stated this was a potential show stopper as the size of the group is location driven and problems with logistics, transportation can discourage attendance. Kevin responded he will seek management approval to host in downtown Memphis. He stated he will outline the options next meeting.

Action item: Kevin Peters

2014

No volunteers for hosting IGs in 2014. No requests for FOEBs.

Item remains OPEN for future updates.

(Continued)

IG 90 AGENDA DRAFT 00

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-02: MMEL IG/FOEB Calendar (Continued)

IG 88: (Ref: MMEL IG-FOEB Calendar - Rev 88-1.doc)

Action - Updates requested

2013

No FOEBs were requested for the year.

Gene Hartman (FAA LGB AEG) stated Bombardier Challenger CL300 jet FOEB what is scheduled for October 2012 was cancelled. No new dates proposed. He also reported that the DHC-8-100/-200/-300 scheduled for December 4-5 was also to be cancelled. The Q-400 series is in progress as scheduled.

IG 91: To be hosted by FDX, 7-8 August, Memphis, TN

IG 92: FAA SEG AEG was requested to take FAA position originally set for 23-24 Oct, Washington DC. New location Seattle, WA.

2014

SWA volunteered to host 4th Quarter IG 96

IG 89: (Ref: MMEL IG-FOEB Calendar - Rev 89-1.doc)

Action - Updates requested

b) Sponsors needed for MMEL IG 93, 94 and 95

Minutes:

a) Tim Kane (Industry Chairman / Jet Blue) presented the calendar showing that as yet nobody has come forth for IG 93, 94 and 95 and stated Jet Blue has a new headquarters in NY City and he asked if the group would be interested in a NY meeting Tim Kane to coordinate and report back to group.

- Greg Janosik (AFS 240) stated that it was listed on calendar that FAA would host IG 92, 4th qtr, 2013.
- He stated this will be held by Seattle AEG. He stated he wants the AEGs to become regular hosts of IG meetings instead of FAA HDQ being the only FAA host.
- Paul Nordstrom (Boeing) volunteered hosting the 3rd qtr 2014, IG 95.

b) Greg Janosik (AFS 240) stated that the schedule of IG meetings needs to be adjusted as meetings in the first two weeks of January has proven to problematic as people do not have time to get assignments and preparatory activities completed before meeting.

- Example was the late release of the minutes for this meeting.
- It was stated that if January, 1st qtr was to be slipped how will that affect the remaining quarters?
- Tim Kane (Industry Chairman / Jet Blue) agreed that the first two weeks of January should be blocked out to eliminate workload conflict with the December holidays.
- Greg stressed need to stay with the 12 week interval between meetings as much as possible.

(Continued)

Agenda for MMEL IG 90

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90-02: MMEL IG/FOEB Calendar (Continued)

c) Paul Nordstrom requested addition of a 777 electronic FOEB be added to the calendar, end for the March, 2013.
   - Also a placeholder was posted to the first qtr, 2013 for an electronic FOEB for Airbus A300-600.
   - It was asked if dates are set. It was answered that FDX, UPS were waiting to hear from AEG Chairman.

d) Todd Schooler (Cessna) stated that for the Cessna hosting IG meeting 90 everybody interested in a factory tour needs to submit personal data to Cessna Security for clearance prior to event.

IG 90: (Ref: MMEL IG-FOEB Calendar - Rev 90-1.doc)

ACTION: Review the MMEL IG/FOEB Calendar

LEAD: Industry Chairman (Tim Kane-JetBlue)

- There are changes to the MMEL IG schedule. Boeing has picked up MMEL IG 91 in place of FedEx and meeting will be held in Rosslyn, VA (DC) to relieve FAA HQ travel sequester.
- 2014 IG 94 remains open
- All 2015, IG 97-100 remain open.
- A320 pre FOEB in work (Delta) (proposed dates)

IG 90 AGENDA DRAFT 00

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 90-1

April 17-18, 2013

2012

IG 90 AGENDA DRAFT 00

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
Jan 4 - 5				**MMEL IG 85**	**Jet Blue**			**Orlando**
Apr 11 - 12				**MMEL IG 86**	**FAA/A4A**			**Washington DC**
TBD				MD 10/11 FOEB	Fed-X			Electronic
Aug 15 - 16				**MMEL IG 87**	**Boeing**			**Seattle**
Oct 10 - 11				CL-300				Electronic G. Hartmann - Chrmn.
Oct 17				MD 11				Electronic LGB AEG
Oct 23 - 25				CL-600				LGB AEG S. Ford – Chrmn.
Oct 24 - 25				DHC-400				Electronic G. Hartmann - Chrmn.
Nov 7 - 8				**MMEL IG 88**	**UPS**			**Louisville**

Provide changes to MMEL IG Industry Chairman – tim.kane@jetblue.com

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 90-1

April 17-18, 2013

2013

IG 90 AGENDA DRAFT 00

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
Jan 9-10				**MMEL IG 89**	**US Airways**			**PHX**
March				777 FOEB				Eectronic
March				DC3 FOEB				LGB AEG
March				A300-600 FOEB				Electronic
April 17-18				**MMEL IG 90**	**Cessna**			**Wichita**
Aug 7-8				**MMEL IG 91**	**Boeing**			**Rosslyn, VA**
Oct 23-24				**MMEL IG 92**	**FAA**			**Seattle**

Provide changes to MMEL IG Industry Chairman – tim.kane@jetblue.com

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 90-1

April 17-18, 2013

2014

IG 90 AGENDA DRAFT 00

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
-	-	-	-	N/A	-	-	-	No IG Meetings, 1st and 2nd week of January
1st QTR				MMEL IG 93	jetBlue			TBD
2nd QTR				MMEL IG 94	OPEN			TBD
3rd QTR				MMEL IG 95	Boeing			Seattle
4th QTR				MMEL IG 96	SouthWest			Dallas

Provide changes to MMEL IG Industry Chairman – tim.kane@jetblue.com

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 90-1

April 17-18, 2013

2015

IG 90 AGENDA DRAFT 00

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
-	-	-	-	N/A	-	-	-	No IG Meetings, 1st and 2nd week of January
1st QTR				MMEL IG 97	TBD			TBD
2nd QTR				MMEL IG 98	TBD			TBD
3rd QTR				MMEL IG 99	TBD			TBD
4th QTR				MMEL IG 100	TBD			TBD

Provide changes to MMEL IG Industry Chairman – tim.kane@jetblue.com

IG 90 AGENDA DRAFT 00

90-03: MMEL Agenda Proposal & Coordination Process

Objective: Keep the document current.

Item Lead: MMEL IG Industry Chairman

Standing Action:

- IG Members are to review the document and provide any changes that are required to the MMEL IG Industry Chairman.

  Document
  http://memberportal.airlines.org/taskforces/engineering_maintenance/mmel/Documents/Forms/AllItems.aspx?RootFolder=%2ftaskforces%2fengineering%5fmaintenance%2fmmel%2fDocuments%2fAdministrative&FolderCTID=0x0120000F20765BCD68A84D9CADB8290AEE1652&View=%7b4E13B2D7%2d24DE%2d40EB%2dA1CA%2d366C499AE032%7d

  MMEL IG Chairman
  Tim.Kane@jetblue.com

- IG Chairman will ensure updates provided by IG Members are addressed.

IG 86: (No attachment)

Todd Schooler has proposed a "Revision Log" be made part of the document to record changes to the document from this point forward; suggestions for the content of such a log as well as support for or objections to Todd's proposal will be discussed at IG 86.

Todd Schooler (Cessna) stated that in a presentation of this Agenda and Coordination document to the upper management of Cessna's engineering department he was asked to explain where does this document come from, who developed it, who maintains it, and where is the history of change located; he stated he had nothing to show them. It was then suggested that a revision record log and highlight of change page should be added to document.

Greg Janosik (AFS 260) questioned who was going to be responsible for the maintenance of such a log? The group responded that it is an FAA document as it is located on www.fsims.com. Greg stated he was totally unfamiliar with the document and its content and thus was not ready to accept responsibility without first becoming familiar with its scope and purpose and how it came to reside on FAA website.

Tom Atzert gave a brief history that it had been initially created by this workgroup in the early 1990's as an ATA document, Spec 100. Later FAA insisted it become a public document and not an ATA proprietary document as it addressed the details of how the MMEL FOEB process is managed, affecting ATA members, non-members and FAA alike. With this explanation Greg agreed that further controls such as a revision record log should be added. (Continued)
He asked who has been responsible for updating this document to date. Answer was it is usually the responsibility of the Industry Chairman. Greg stated before any further decisions are made regarding this document he needs to read and become familiar with its content.

Action Item: **Greg Janosik –** Review MMEL Agenda Proposal & Coordination Process.

(Continued)

90-03: MMEL Agenda Proposal & Coordination Process (Continued)

IG 87: (Ref. MMEL Agenda Proposal and Coordination Process – R 14)

Bob Taylor (US Airways) asked if there are any updates to this document. Paul Nordstrom (Boeing) advised person currently listed as APA contact has retired, and name should be removed and position shown as open. General discussion regarding who is responsible to keep document updated. Greg Janosik (AFS 240) stated he was unable to review the document and had no comment but agreed to get with A4A, Joe White, on issue. It was mentioned that the copy posted on www.fsims.faa.gov is several revisions out of date.

Action Item: Bob Taylor to provide update for FAA to post.

IG 88: (Ref. MMEL Agenda Proposal and Coordination Process – R 15)

Action Item: Industry Chairman

Tim Kane

- Update- MMEL Agenda Proposal and Coordination Process – R 15 is posted on FSIMS

Item remains OPEN for future updates.

Greg Janosik (AFS 240) asked why the MMEL Agenda Coordination / Process document was on the agenda. He stated he was unaware of the purpose of the document, where it originated from and who uses it. Kevin Peters (FDX) stated the document is in need of serious updating as it contains an outline of how an operator should build and submit an MMEL proposal to FOEBs. He stated it contains a non-standard template for an MMEL item and that this needs to be revised. General discussion was held on who adheres to the guidelines of the document. Kevin stated he felt at a minimum FAA needs to agree with the standard of presentation used to submit MMEL proposals and thus a workgroup should review and revise the document. Tim Kane (JetBlue / Industry Chair) agreed that is should be pursued. He stated the contact list of manufacturer and Lead Airline representatives also needs updating.

Greg Janosik recommended that the AEG members present to take issue back to their respective regional managers and someone be nominated to submit AEG inputs to workgroup. Gene Hartman (FAA LBG AEG) stated that he while he agreed with Kevin input he questioned of the efficiency of document by stating it is rarely followed by FOEB participants. Greg stated he thought as much based upon the lack of initial group feedback that Kevin's comments. This was immediately countered by several members who stated that while small aircraft operators may not need such guidance it is definitely beneficial to large transport air carriers.

IG 90 AGENDA DRAFT 00

(Continued)

IG 90 AGENDA DRAFT 00

90-03: MMEL Agenda Proposal & Coordination Process (Continued)

Kevin stressed that the FAA has accepted the Lead Airline Concept and the Agenda Coordination document was developed to outline how the concept was to be followed and the conventions to be used to support FOEBs, etc. A manufacturer representative from stated they did not follow the Lead Airline concept but otherwise found the processes within the document useful. This comment was seconded by Todd Schooler (Cessna) stating the timelines of activities as outlined in document is representative of level of activity that needs to be followed to coordinate and process an MMEL. Paul Nordstrom (Boeing) stated they do not delegate responsibility to Lead Airline but do coordinate their activity with the Lead. Todd countered with fact that small aircraft manufacturers do not have Airlines as customers. Paul stated in the Large Transport category the Lead Airline concept is a useful entity. Tim Kane summarized stating workgroup needs to take this into account.

Lead: Kevin Peters (FDX)
Tim Kane (JetBlue)
Paul Nordstrom (Boeing)
Todd Schooler (Cessna)
Note: A contact from SEA and/or LBG AEG to be assigned.

IG 89: (Ref. MMEL Agenda Proposal and Coordination Process – R 15)

ACTION: Draft in work but it will take another meeting before there anything tangible to present.

Workgroup:
Lead: Kevin Peters (FDX)

Tim Kane (JetBlue)
Paul Nordstrom (Boeing)
Todd Schooler (Cessna)

Note: A contact from SEA and/or LBG AEG to be assigned (Update pending from Greg Janosik (FAA).

a) Kevin Peters (FDX) stated that he had no drafts, attachments as of this time.
- Instead he had requested inputs from various parties, AEG's on their desired template for an industry submission for MMEL change, members from the Part 91, 135 community on their suggested process to use other than the Lead Airline concept as it has been mentioned by several persons from within that community that they did not have the resources to follow the lead concept.
- He stated he had asking them to submit suggestions on an alternative approach to be followed. He reported limited success in gathering inputs with only a few feedbacks, possibly due to the holidays and peak flying plus his own tight schedule had precluded him from drafting anything meaningful as of this time.

b) Tim Kane (Industry Chair / JetBlue) recommended a February 5th conference call to kick start the process.

Follow up:
Conference Call was rescheduled to Feb 19th

Action item: Kevin Peters (FDX)

Item remains OPEN

(Continued)

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-03: MMEL Agenda Proposal & Coordination Process (Continued)

IG 90: (Ref. MMEL Agenda Proposal and Coordination Process – R 15)

ACTION: Draft in work, item will remain at the workgroup level until ready to present.

- Update- Conference Call held on Feb 19th and revision proposals were discussed.

LEAD: Kevin Peters (FDX)

Workgroup:

Paul Nordstrom (Boeing)
Todd Schooler (Cessna)
Tim Kane (JetBlue)
John Pinnow (FAA-AEG)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-04A: Policy Letters Issued in Calendar year

Objective: Maintain for reference purposes a listing of FAA MMEL PLs issued as "Final" during the calendar year.

Item Lead: MMEL IG Industry Chairman

Standing Action: MMEL IG Industry Chairman will ensure list is updated accordingly.

IG 87: (Ref. PLs Issued for Calendar Year 2012 – R87)

PL matrix reviewed. Bob Taylor (US Airways) stated PL 25_R18, 59_R4, and 63_R4 that recently released still need to be added.

Action Item: Industry Chairman

Item remains OPEN for future updates.

IG88 (Ref : PLs Issued for Calendar Year 2012 - R88.pdf - Copy of Policy Letter Analysis Chart.xls.)

Action Item: Industry Chairman

- Bob Taylor (US Air) provided " PLs Issued for Calendar Year 2012
- George Ceffalo (FAA) provided "Policy Letter Analysis Chart"

Item remains OPEN for future updates.

George Ceffalo (AFS 240) gave a presentation showing level of PL activity year over year that outlined a spike in numbers in the last year, 2012. He stated the increase in number for year 2011 was primarily due to FAA re-formatting the PL along with new generated PLs. The reason for large number of PL revised in 2012 was what he referred to as 'clean up' rewrites. He cautioned that due to new internal FAA review process that now includes FAA legal that fewer PLs will flow through without challenge, or rejection. He thus concluded the number of PL approvals will slow down.

IG89 (Ref : PLs Issued for Calendar Year 2012 - R89.pdf - Copy of Policy Letter Analysis Chart.xls.)

Action Item: Industry Chairman

- Bob Taylor (US Air) " PLs Issued for Calendar Year 2012
- George Ceffalo (FAA) "Policy Letter Analysis Chart"

Item remains OPEN for future updates.

a) The FAA PLs issued in year 2012 were reviewed.
   - George Ceffalo (AFS 240) stated that there was a total of 25 PLs issued in the year, with three more issued since the new year.

b) Greg Janosik (AFS 240) reported there were four PLs that were supposed to have been released pursuant to the cancellation of restrictions on wheelchair accessible lavatory, archiving of PL 128.
   - Greg reported that these four are supposed to undo changes brought on by PL-128 but with rescinding of PL 128 these four, PLs 25, 77, 102, and 125 have been approved to change back to their pre-128 standard but for undeclared reasons have yet to be posted.
   - Greg then reported that year 2012 was a rather successful year but he cautioned he does not see this level of activity repeating in the future.
     Note: Additional discussion on rescinding of PL-128, refer to agenda Item 98-08.

(Continued)

90-04A: Policy Letters Issued in Calendar year (Continued)

IG90 (Ref : PLs Issued for Calendar Year 2012 -2013 R90.pdf - Copy of Policy Letter Analysis Chart.xls.)

ACTION: Review Issued for Calendar Year 2012 – 2013 R90.pdf

LEAD: MMEL IG Industry Chairman

Updates-

- Bob Taylor (US Air) - PLs Issued for Calendar Year 2012-2013
- George Ceffalo (FAA) - Policy Letter Analysis Chart"

Item remains OPEN for future updates.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-04B: Policy Letter Status Summary

Objective: Maintain for reference purposes a listing summarizing the current status of all FAA MMEL PLs.

Item Lead: MMEL IG Industry Chairman

Standing Action: IG Members are to review the POLICY LETTER STATUS SUMMARY and advise the MMEL IG Industry Chairman of any changes that are required. Email tim.kane@jetblue.com and Robert.Taylor2@usairways.com Note: Bob Taylor (US Airways) has been maintaining the summary document.

IG 85

Current Rev 85 as of 12 Dec, 2011 was reviewed. Question rose as to whether or not title of old PL should be retained and not replaced with the word ARCHIVED as meaning is lost.

Action Item: Bob Taylor to replace the word ARCHIVED with the title of the old PL.

IG 86: (Ref. PL STATUS SUMMARY)

Bob Taylor requested assistance from industry in identifying the title of archived PLs 18, 21, 42, 48, 49, and 51 (ref. MMEL POLICY LETTERS (PL) STATUS SUMMARY attachment). Paul Nordstrom (Boeing) volunteered to assist.

Action Item: **Paul Nordstrom**.

IG 87: (Ref. PL STATUS SUMMARY – R87)

Paul Nordstrom (Boeing), Bob Taylor (US Airways) and Greg Janosik provided some of the missing titles of the older PLs. After a follow on discussion by Paul was held regarding a 1992 TOC, it was determined the older PLs that are still missing will most likely never be found. This action is considered closed. This item to remain on the agenda for updates as required.

IG 88: (PL STATUS SUMMARY - R88.pdf)

Review updates

- Bob Taylor provided PL STATUS SUMMARY - R88.pdf

Item remains OPEN for future updates

The PL status summary, a listing of active PL by title, was presented. Tim Kane (JetBlue - Industry Chair) stated this document was created and is being maintained by former industry chairman, Bob Taylor (US Airways) and he asked if this product was of value to industry members. He outlined the details of the summary as showing all the PLs, by title, date, revision standard, and if active or archived, or transferred to 8900.

Paul Nordstrom (Boeing) suggested it would be helpful is this product could be updated to reflect 8900 location, chapter and section where PL information has been transferred to in 8900. Greg Janosik (AFS 240) stated he hesitated giving such location data pending the outcome of 8900 rewrite what it ongoing.

(Continued)

90-04B: Policy Letter Status Summary (Continued)

IG 89: (PL STATUS SUMMARY - R89.pdf)

Action

- Bob Taylor PL STATUS SUMMARY - R89.pdf

Item remains OPEN for future updates

Bob Taylor's (US Airways) summary sheet was reviewed. This sheet keeps track of status, PLs in draft form, those active, those archived, and those incorporated in 8900.1.

IG 90: (PL STATUS SUMMARY – R90.pdf)

ACTION: Review the POLICY LETTER STATUS SUMMARY

LEAD: MMEL IG Industry Chairman

Upate - Bob Taylor provided PL STATUS SUMMARY – R90.pdf

Note: A4A site has a folder established to use as a library for reference PLs

Item remains OPEN for future updates

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-04C: Policy Letters Under Revision

Objective: Maintain for reference purposes a listing summarizing the current status of all FAA MMEL PLs under revision.

Item Lead: MMEL IG Industry Chairman

Standing Action: IG Members are to review MMEL PLs UNDER REVISION and advise the MMEL IG Industry Chairman of any changes that are required. Email tim.kane@jetblue.com and Robert.Taylor2@usairways.com
Note: Bob Taylor (US Airways) has been maintaining the PLs Under Revision document.

IG 87 (Ref. PLs Under Revision – R87)

Matrix was reviewed. Bob Taylor (US Airways) stated PLs 25_R18, 59_R4, and 63_R4 need to be removed off list.

Action Item: Industry Chairman.

IG 88 (Ref. PLs Under Revision - R88.pdf)

Action Item: Industry Chairman –

Tim Kane Review updates
- Bob Taylor (US Air) provided PLs Under Revision - R88.pdf

Item remains OPEN for future updates.

Paul Nordstrom (Boeing) and Bob Taylor (USAirways) discussed their effort to gather historical documents. IG asked if A4A would be able to support a document library on behalf of the MMEL IG.
Bob Ireland (A4A) will look into this request.

IG 89 (Ref. PLs Under Revision - R89.pdf)

Action:
- Bob Taylor (US Air) PLs Under Revision - R89.pdf
- Bob Ireland (A4A) update if A4A would be able to support a document library on behalf of the MMEL IG

a) PLs under revision were reviewed.
- The request for A4A to host a reference library of archived PLs was raised (again).
- Bob Ireland (A4A) stated the request has not yet been acted upon but will be considered and answer will be forthcoming before next meeting.
  Note: More on this topic of library site. Refer to next agenda item, 89-05

(Continued)

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-04C: Policy Letters Under Revision (Continued)

IG 90: (Ref. PLs Under Revision – R90.pdf)

ACTION: Review the PL Under Revision

LEAD: MMEL IG Industry Chairman

Upate - Bob Taylor provided PL PLs Under Revision – R90

Note: A4A site has a folder established to use as a library for reference PLs

Item remains OPEN for future updates

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-05: Policy Letter Process - A Focus on Comments

Objective: Clarification of the process utilized for the Development and Maintenance of Policy Letters

Item Lead: Greg Janosik – AFS 240

Discussion:

IG-85: (Reference PL Process MMEL IG 12-13-2011)

Greg Janosik (AFS 260) presented a flow chart on policy letter development and maintenance that outlines the process that is used to pass PL thru MMEL IG portion of PL development and then internal FAA review. He stated on the FAA side of flowchart it is a minimum four week process yet for the MMEL industry side he cannot place a timeline for flow through of PLs. Tom Atzert defended the industry position as been often prolonged by FAA issues in the early development phase. Bob Taylor asked if major change occurs on FAA side of flowchart where the notification back to industry side is as it was not shown in Greg's flowchart. Greg stated if a significant issue was to occur such as a regulatory change then the PL should be moved back to the industry side and his chart did not account for it to do so, yet he defended it absence as he reported that is in his opinion a very rare event.

He presented the FAA internal draft site and the presentation of how each posted PL appears. He pointed to the comment grid and it was questioned 'how does a reviewer know if comments have been added and PL updated. He indicated comments are posted with dates. He walked the group thru the comment grid and stated submitter needs to save the comment grid as a file and then e-mail them to FAA using e-mail link. He reported that if PL is updated the draft number will be upgraded.

He then stated as comments are posted to the website it becomes the responsibility of the PL Lead to respond to comments. He stated if Lead does not respond then when comment period expires the PL will not move forward thru FAA and will remain in the IG as a part of workflow and be addressed as an agenda continuation item. Greg stated that before that occurs he will call the Lead and communicate the need to comment. Finally he stressed again that the FAA will not take the PL into their internal review until all comments are responding to by Lead.

Tom Atzert (UAL) asked if PLs are going to go thru the Federal Register and Greg stated yes if significant change in policy occurs or withdrawal of relief was to occur. Greg introduced a Ms Anne Bechdolt, FAA legal representative, who will be advising the group at future meetings of needs to post and when not to post to Federal Register, etc. It was asked what was actually going to Federal Register as the PL format cannot be accommodated; Register reads like a newspaper column. He states as they have not posted one yet they are still wrestling with legal on how to proceed. Pete Neff (AFS 240) gave example of some activity that has been handled by posting to the register and how each posting has to remain open for 30 days and numerous, in fact hundreds of comments can be received. Greg mentioned how comment to PL posted to the register will be become his to respond to and thus any such posting will be time consuming. Finally Pete concluded with for those who need to know, understand the process, they should review FAR 11 that goes thru the entire Federal Register and rulemaking process.

(Continued)

90-05: Policy Letter Process - A Focus on Comments (Continued)

IG-86: (No attachment)

IG Chairman's Note - No specific action was assigned for this item at IG 85, nor did the item indicate it was to be closed; it has been kept on the agenda until its status can be determined.

Greg Janosik (AFS 260) presented a revised color coded chart of the process utilized in the development of PLs as they move from an MMEL IG draft to FAA to final release (Ref. meeting minutes bookmark AI 86-05 PL Process V2.ppt). He walked the group through the chart and concluded this is how he perceives the process to function after working this past year or so with the MMEL IG and FAA HDQ. He then stated as such the chart should reside somewhere where the membership can periodically review it. Kevin Peters (FDX) stated he felt this chart should be documented as a part of the MMEL Agenda Proposal & Coordination Process document. Greg stated he was not familiar with that document but he will take that recommendation under advisement.

He asked the group for critique as whether they felt the chart accurately represented the process. Some discussion was had on the PL posting for the comment portion of chart and who sees the draft and comments made at that time, i.e., does the industry, public, see all comments like public and FAA internal comments and/or are just public comments posted, etc. It was asked what is the FAA Legal Department's responsibility within the process. Greg stated they are ensuring relief is correct, can be legally upheld, and is within scope of the regulation(s). Dennis Landry (ALPA) stated that he was already concerned over the how long it takes to gain PL approval now, and he is dismayed that Legal is now an integral part of the process. Greg stated it is essential, it cannot be avoided and it will by necessity add to the timeline of the development of PLs.

Dennis then raised the issue of many PLs being archived and 'going away.' Lengthy discussion pursued on the issue of archiving PLs and the incorporation of their content into FAA Inspector handbook 8900.1. Kevin Peters (FDX) stated that once the PL subject is incorporated into 8900.1 it is typically reduced to a sentence or two becoming more directive than guidance, thus the majority of content (e.g. the reasons for the policy change, the justification, the history of why the PL subjects were created, the record of changes, etc., are all lost as this information is no longer available (no longer transparent). In addition Industry does not know where to find the information once it is moved into the 8900.1 document. Candice Kolander (AFA) concurred with Dennis and stated not only does the PL become reduced to a sentence or two, there is no assurance that the minimal content of the PL that is incorporated into 8900.1 is not deleted, or changed again without involvement of the MMEL IG.

Greg stated the incorporated PLs do not go away but are placed in an archived status and therefore are available. He stated that although a matrix showing the location of where the PLs have been placed in 8900.1 is not available, a history mark is placed within each PL prior to its archiving identifying the incorporated 8900.1 chapter, section, para, etc. After a short discussion he had to concede that the PLs with the history mark are only internally accessible by FAA. Bob Davis (AFS 260) stated that prior to the establishment of the FSIMS website there was a degree of loss of history of older PLs; it was suggested that if members of Industry have any historical records of older PLs the FAA will accept them and see that they are scanned into the FSIMS repository. Finally Greg and Bob both agreed that access to some form of matrix for locating where incorporated PLs can be found in 8900 will be taken under consideration.

Action Item: Greg Janosik – Consider development of matrix for locating archived PLs in 8900.1, including those already archived.

Action Item: MMEL IG Industry Members – Review your historical records for any older PLs and forward to Bob Davis and Greg Janosik.

(Continued)

IG 90 AGENDA DRAFT 00

90-05: Policy Letter Process - A Focus on Comments (Continued)

IG-87: (No attachment)

Bob Taylor (US Airways) outlined how Greg Janosik (AFS 240) had action item to create database, matrix, of location of where ARCHIVED PLs topics that have been incorporated 8900.1 were to be found. Greg stated that some 32 active PLs have gone into re-write of 8900.1 and a matrix of where all these are to be found in 8900.1 Greg stated that this matrix will be available when rewrite is complete. There was a general consensus the Matrix should become part of the MMEL IG Agenda (similar to the PL matrices) when available.

It was asked if previously archived PL 109 could be made available as there were problems with this topic, i.e. How to obtain MMEL relief for STCs. Todd Schooler (Cessna) stated he had requested PL109 be re-activated and currently listed on www.fsmis.faa.gov .

John McCormick (FedEx) raised the issue of conflict, confusion, over a perceived change in Category D relief and the fact that PL 52 is archived and AEGs are using the perceived new Category D policy as justification for refusing to approve a recent request for new Category D relief. Furthermore, when asked if he could be given a copy of the 8900.1 Vol 8 re-write to see how the reported Category D policy has changed as AEG claimed, his request was denied. He stated they should not be using guidance that is not officially approved, and PL should not be archived until the new standard is released.

Greg Janosik (AFS 240) stated the FAA was not going to release any further drafts as the document (8900.1) has advanced to the official Document Control Board review stage within FAA Headquarters. He stated that industry had participation in the 8900.1 Vol 4/Ch 4 rewrite and the text of PL 52, Category D will be the same in the AEG Volume as it is in Vol 4, and if anybody needs to know how it reads then they should consult the Vol 4 re-write drafts already made available to industry. He stressed that he knew of no change of policy.

General discussion was held that a problem existed when PLs are archived but information contained in them is still actively sought. Greg stating as with PL 109 he has no problem in pulling a PL out of archive and reposting but he was frankly at a loss as this was the first time he had heard of any problems relating to this topic.

Item remains OPEN regarding status of Archived PL Matrix, and pulling PL 109 out of archive.

(Continued)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-05: Policy Letter Process - A Focus on Comments (Continued)

IG 88

Action- Greg Janosik FAA
Update status of Archived PL Matrix, and pulling PL 109 out of archive.

Greg Janosik (AFS 240) stated the PL comment grid found on the www.fsims.faa.gov website is in his opinion working well and he asked if anyone from industry member present had any issues with how the comment grid / process works. Todd Schooler (Cessna) stated he has had various comments submitted that did not ever get posted. Greg asked who he had sent comment(s) to and then stated he had no answer to why this had happened. He then outlined how comments only remain on site for 30 days and then if not responded to get pulled down.

Next he explained that a minor exception of PL getting posted to comment grid recently occurred, two PLs got revised and immediately released. He stated the first one was PL 25, revision 19. He stated this was conscious decision as they had been discussed at last meeting and followed up conducted by the industry chair and it was straight forward. Greg outlined how previous rev to PL 25, rev 18, was a large change and an overly drawn out process and he did feel that he wanted to get subject of change rev 19 out, due to the importance of timely release, and not once again bogged down with unrelated comments to the immediate subject of change. He outlined how rev 18 continued to grow in scope and became almost unyielding and confusing. Rev 19 change was simply and straight forward so it was immediately released.

He then stated the other PL was 114, Rudder Pedal Steering. He stated it was considered a safety issue that needed to immediately be resolved. He defended this position as being well coordinated and reviewed by FAA upper management and no room for discussion. He stated that this occasionally happen. He then stated another immediate change will be occurring to PL 128 that will affect five other PLs but deferred further comment as it is a separate agenda item, 88-10A. He concluded that these PL changes will not be posted on comment grid too.

Daryl Sheets (Net Jets) expressed concern over the new process of internal FAA review. He stated the more FAA gets accustom to this new decision making process the less industry input will become. Greg defended the new process was needed and indeed overdue. He stated industry has a 'free hand' in crafting PL and FAA oversight needs to be reinforced. Brief discussion was held on how industry coordination was had on rev 19 to PL 25. Daryl expressed that he hoped any substantive changes will continue to be worked with IG and be posted. Greg assured him FAA will not be arbitrary changing PLs. He then stated only in the exception case of an immediate safety issue will comment period be skipped.

Kevin Peters (FDX) stated that there was a problem with local FAA demanding immediate MEL revisions to incorporate each successive revision of PL 25. He stated with PL revision like rev 19 not going to comment and then being released without notice of it release operators are caught unaware of change. He reported that prior to release of PL 25, rev 18 his local FAA was demanding PL 25 changes also be incorporated verbatim. He stated that is not always doable and operators should be able to tailor definition to fit their fleet, type of operation, etc. He reported that this was amended by release of PL 25, rev 18 which incorporated new policy statement that operators may edit and tailor definitions.

He stated operators are not required to immediately incorporate all MMEL changes but per 8900 only more restrictive elements and then there is a prescribed time limit, 90 days, to get such material to FAA. He felt PL 25 should have similar guidance. Dave Burk (Aerodox) stated he has similar issue arise with FAA inspectors too. Greg stated Kevin should present a draft, rev 20, to PL 25.

Action Item: Kevin Peters (FDX)

A follow on discussion occurred regarding the new process of internal FAA review, development of Policy Letters (PLs):

(Continued)

IG 90 AGENDA DRAFT 00

90-05: Policy Letter Process - A Focus on Comments (Continued)

Dennis Landry (ALPA) raised concern as to the level of internal FAA management attention Policy Letters (PLs) have been getting in recent times. He asked what has been driving this, and questioned if they are looking at the large body of PLs or just been driven by specific issues that bring attention to specific PLs. He stated he was attempting to determine if the work of MMEL IG was proactive enough.

George Ceffalo (AFS 240) stated that in the early years of MMEL IG industry had a free hand, things were 'under the radar' of FAA upper management but as time when by certain PL actions were requested to be brought to attention of management and thus FAA began to instill more oversight and hence PLs now are more closely being scrutinized. He predicted that PLs therefore will take longer and become fewer due to this increased higher level management visibility.

He went on to describe two different philosophies exist about purpose of PLs. One generally expressed by AEGs and the other from FAA Headquarters. The first that PL should in interim internal FAA process, the other a means for proactively gathering input from affected users but as these have started to get high level FAA management review, disparities have been discovered. He cited examples of PLs that were contradictory to FAA rules, preambles, etc. Greg Janosik re-enforced George's comments and concluded the process while it is now much more highly structured the intent is to provide safe sound relief.

Item remains OPEN.

IG 89

Action
Greg Janosik FAA -Update status of PL comments grid found on www.fsims.faa.gov

a) Greg Janosik (AFS 240) stated this agenda item was just a placeholder for dissemination of information on how FAA draft comment grid is intended to be used.
   - He stated the Lead for the PL will now be the responsible party to respond to comments posted.
   - He stated how when grid was first established he, Greg, attempted to answer but he felt it was more appropriate that the PL Lead perform this function as they normally are more knowledgeable of industry concern(s).

b) Tim Kane (Industry Chair / JetBlue) stated that industry comments are sent out by e-mail and occasionally get sent to wrong parties and thus don't get posted to draft comment grid.
   - Greg re-stressed that this is not the FAA FSIMS document site and only by sending e-mail directly to George Ceffalo will ensure their comments are posted to comment grid.
   - He also stressed that unlike fsims there is no automatic notification of posting, thus everybody must periodically review the comment grid.

c) John McCormick (FDX) stated the problem with George being the sole communicator of posting to the draft site does not work well.
   - He stated he felt this is possibly due to huge amount of recipients on George's e-mail list that company e-mail filters are possibly stripping out these messages due to size, considering them as spam?

(Continued)

90-05: Policy Letter Process - A Focus on Comments (Continued)

d) Greg concluded with promise he would sit down with FAA AFS 140 and see if notification of PL drafts can be improved.
- Additionally, Tim Kane asked if everybody is signed up to the A4A members portal web site where the MMEL IG document library resides.
- It was stated if anybody is not then they need to contact Bob Ireland at rireland@airlines.org.
- Bob then informed the group that a directory called 'library' on A4A site was just established.
- It was recommended that Bob Taylor (US Airways) and Paul Nordstrom (Boeing) provide A4A copies of archived PLs for uploading.
- Plus it stated that PL posted there will be watermarked as reference only. Another point was that FAA wanted them to be in .pdf format

Item remains OPEN.

IG 90: Policy Letter Process - A Focus on Comments

ACTION: Review Coments and process utilized for the Development and Maintenance of Policy Letters

LEAD: Greg Janosik – AFS 240

Update – During conference call on March 20th issues with FSIMS were brought up. FSIMS was backlogged and updates were not being posted.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief

Objective: To discuss an appropriate location (permanent home) for the information contained in the recently released N8900.192.

Item Leads: Tom Helman – FAA (AFS-330), Tom Atzert (industry co-lead)

Discussion:

IG-87: (Ref. n8900_192)

Tom Hellman (AFS 330) brought up discussion on where this notice guidance should be placed, as a separate Policy Letter or as a MMEL definition? He stated it needs to be published in a more permanent place than a Notice. Tom Atzert (UAL) reported that a previous industry member of IG, Mark Lopez, is now working in AFS 330 and he informed Tom of the implementation of the current Notice. Tom initial reaction was that such action only institutionalizes a long standing industry practice, but then he felt that standard practices information more appropriately should reside in an operators General Maintenance Manual / Maintenance program and not in MMEL. He outlined how it would need to be published in every aircraft type MEL, and that this could lead to differences and even inadvertent omissions from one MEL to another and thus lack of standard application. He concluded if it is written into a PL, or definition, or in 8900 it will need to be careful crafted to give operator flexibility to handle this practice.

Discussion continued on appropriate place for this guidance and it was stated that PL is probably not the place but for visibility, benefit to FAA Inspectors, it probably should reside in 8900.1 An AEG chairman from Seattle AEG stated MEL should only be used to address dispatch status of an airplane and should not contain maintenance theology. Tim Kane (JetBlue) stated that this Notice has triggered a lot of discussion between operators and their FAA CMUs over maintenance practices contained in MELs. He reported that only a very small percentage of MEL items contain specific statements that approve swapping. He stated he agreed that the appropriate place for this practice is for it to be listed in the company GMM.

John McCormick (FedEx) presented the case that such action should only be approved if it is addressed in MMEL at the proviso level. Group in general disagreed. Todd Schooler (Cessna) outlined how the manufacturer is not going to spell out maintenance methodology of how a proviso action is to be accomplished. A proviso is a condition that must be met. He stated troubleshooting and other practices are not detailed in MMEL.

Paul Nordstrom (Boeing) summarized that using a PL had been deemed inappropriate by the group, nor should it be a proviso, so that leaves only 8900.1 as the vehicle to carry this information. Tom Atzert (UAL) stated he had no objection if it to be placed in 8900.1 but re-stressed his earlier point that it needs to be administrated at the operator level by being a part of their GMM. This approach appeared to be agreed to my majority of the group present. The question was raised as to what are the problems that lead to the FAA issuing the 8900.192 Notice? Tom Atzert reported he had been informed that a number of field inspectors had observed the practice of swapping parts been performed and not finding any written guidance that states it is an acceptable practice. This lead to their requests for clarification, direction from AFS 330.

Greg Janosik (AFS 240) concluded that this inspector guidance and hence must go into 8900.1. He stated it could not be accommodated in the current 8900 re-write and he was unsure how and when they will be able to publish it in 8900. Meanwhile it was agreed that industry should have some input in the drafting of paragraphs to be placed in 8900. Joe White (A4A) questioned if it would better handled as an Advisory Circular.

Todd Schooler (Cessna) chimed in with related information regarding an EASA NPA (Notice of Proposed Amendment) document he recently received from EASA. It states EASA plans to impose a requirement that that if an operator swaps parts within an airframe to make an MEL deferral then in order to return the aircraft to service they must first perform Check Flight. He stated if FAA was going to place the 8900.192 Notice information into either 8900, or into an AC, then FAA should take into account the impact of this EASA action.

(Continued)

90-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief(Continued)

The EASA representative present, Thierry Vandendorpe, clarified that intent of the NPA is to legalize a practice of the performance of in-flight troubleshooting. He clarified further by giving an example of a fire loop deferral. He stated in some cases the aircraft needs to be placed into its operational environment to validate certain conditions that he states cannot be reliably simulated on ground. He stated he works within the MMEL department at EASA and they have not been approached by people developing this NPA regarding imposing this as a procedure in MMEL.

He concluded by stated he felt that this was therefore it is a related topic but he stressed it was not made to purpose to address the practice of MEL part swapping. That said, he then stated EASA has been approached by industry on the subject MEL part swapping but had not yet reached a position. He stated concern is centered on when part swapping mechanics are installing a known piece of equipment that has failed He continued stating they are wangling with how to apply a waiver to installing a failed part and allow aircraft to be still dispatched.

Boeing and the Cessna representative debated the need to conduct check flights when installing known failed part. Paul (Boeing) was adamant that they, Boeing, did not have any procedures requiring a functional check flights. Finally, Industry Chairman asked it this is to be pursued as guidance in 8900 or an AC then a workgroup should be assigned to work on drafts.

Workgroup volunteers:
Tom Helman – FAA (LEAD)
Tom Atzert – United (Co-LEAD)
George Roberts – Delta
Mike Evanoff – Virgin America
Mike Baier – American
Todd Schooler – Cessna
Tim Kane- JetBlue
Nick Petty –Executive jet
Darrell Sheets – Net Jets

IG 88 (See File)

Action – Tom Helman/Tom Atzert Work Group Leads

- Provide update
- Work group discussed subject on conference call October 25, 2012.
- Tim Kane (JetBlue) has the action to draft a revision to the notice for the workgroup.
- Todd Schooler (Cessna) identified possible candidate AC, AC 20-62E

Item remains OPEN

Tom Helman (AFS 330) not present for meeting. Tim Kane (JetBlue / Industry Chair) asked if co-lead had any comment. Tim then identified an old AC, AC 20-62E that was brought to the table during a workgroup meeting. AC topic is “Eligibility, Quality and Identification of Aeronautical Replacement Parts” that apparently provides guidance of the suitability of swapping parts within an airframe. Todd Schooler outlined purpose of AC and how it could be used in the MMEL scenario. He described how once troubleshooting has determined what has failed, the part in question can be switched between positions to see if the fault follows, confirming the failure and then MEL’ing it. He stated how language from this AC could be used to support that this is a common industry practice.

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IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief(Continued)

Tim Kane asked if this meant the AC would need revision. Todd stated yes, and Tim responded that AC is advisory guidance only and asked how it could be used. He asked co-lead, Tom Atzert (UAL) for opinion. Tom spoke to the consensus of the workgroup that re-establishment of an AC would be the best vehicle for getting information out to the industry on how to swap parts between positions on an aircraft. He stated it would be an acceptable means by which an operator could use to justify publishing a parts swapping procedure in their GMM. Tom then stated he has conferred with A4A and AFS 330 and there appeared to be acceptance that the AC would be a good solution.

Tom referred to the AFS 330 Notice that came out a couple months on topic of swapping parts, stating that it represented a notion of acceptance within FAA of this practice, yet the content of the Notice was not written in manner that well received by industry. He stated their plan is to get revised language into the Notice, re-issue the Notice and while it out there work on revising the AC and hopefully getting it approved during the period that Notice is active.

Greg Janosik (AFS 240) stated he agree with the AC approach. He also stated the process needs to get written into the AFS 330 section of Inspector Handbook, 8900.1. Tim Kane stated that during the conference call Tom Helman was agreeable to revision of the Notice and that he, Tim, committed to drafting the necessary changes. Greg Janosik cautioned that while industry input is valued it is not in the preview of industry to write FAA inspector guidance but he stated industry participation in this issue is welcomed, but final wording will be decided by FAA.

Discussion of the misunderstanding surrounding in poor choice of wording in initial Notice was discussed. Greg stated that unfortunately his department did see the Notice prior to it issuance but had it been they may have been able to advise AFS 330 that requiring the part swapping procedure be published within each applicable MEL item was probably not the approach to take. Needless to say he concluded that revising Notice, updating AC, and then incorporation into 8900 was the right path to take. He stated industry needs to coordinate closely with Tom (AFS 330) to get this done in timely manner as a Notice can only remain active for 12 months.

Action Item: Current workgroup / Tom Helman (AFS 330)

Item remains OPEN

IG 89 (See Attached File)

Action – Tom Helman/Tom Atzert Work Group Leads

- Provide update
- Work group discussed subject on conference call October 25, 2012.
- Todd Schooler (Cessna) identified possible candidate AC, AC 20-62E
- Tom Atzert (UAL) provided industry draft to Tom Helman

Item remains OPEN

a) Tom Atzert (UAL) stated the group had a teleconference on this issue and the discussion centered around where is the most appropriate place for the parts swapping guidance be located.
   - The original Notice stated the guidance should reside in the MEL (M) procedures. He stated that this not really the appropriate place, instead it should be within the companies' GMM.
   - Workgroups initial proposal was to amend the Notice with text drafted by the workgroup.
   - He reported that Tom Hellman (AFS 300) apparently initially agreed but then disagreed as it was discovered that FAA procedures preclude amendments of Notices. Instead a Notice has a short life (max 12 months) and that can only be cancelled versus being revised

(Continued)

90-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief(Continued)

b) Tom Atzert stressed that the current Notice contains misleading information and does not serve operators.
- He outlined how the workgroup drafted detailed parts swapping procedures that are to be found in companies GMM not MEL. He stated that all this was forwarded to Tom Hellman.
- Tom Atzert then outlined that Tom Hellman expressed more disagreement that centered upon discovery that some manufacturers DDGs do carry guidance on permissible part swapping; thus he feels justified that this type information should be contained in MEL as per current Notice.

c) Tim Kane (Industry Chair / JetBlue) stated that DDG parts swapping information is usually restricted to less apparent applications as not all swappable parts are listed in DDGs.
- He gave examples of normal parts swapping practices not found in DDGs. Whereas there are certain DDG items that state that certain component(s) are interchangeable, can be used in several different locations; information that may be not be readily apparent are occasionally appropriate.
- Tim also mentioned that parts are swapped for multitude of reasons and not just for purpose of establishing an MEL deferral. He listed several reasons such as troubleshooting, to extend time / life such as repositioning DUs to preclude screen burn out, etc.

d) Tom Hellman defended the AFS 300 position.
- The stated that the time the Notice was first created it was driven by concern of the practice of swapping parts between compatible component positions to apply MEL relief.
- In regards to the placement of the information he stated the statement in Notice that it be placed in the MEL remarks and exceptions column was just given as an example.
- He stressed that it is so stated within the Notice that it is just an example. He stated that this example came from their examination of several different manuals.
- He stated some operators place everything into MEL while others refer to where information is listed in other manuals.
- He concluded with that while he agreed that such guidance should reside in an operator's GMM at the time the Notice was written no guidance at all existed.

e) Tom Hellman, in to reference workgroup's drafted Notice amendment, stated it went into far more detail on how an operator should verify parts compatibility than what he felt a Notice should. He outlined how the details are for every operator to determine and publish.
- He then referred to the fact that this is somewhat covered by several ACs. He stated the main AC they examined was AC 20-62, Eligiblity, Quality, Identification of Aeronautical Replacement Parts. He expressed they did not feel this was a good location to place the part swapping guidance either because as per the AC title it may be overlooked. He said they looked at another AC, 120-16, which is applicable to Part 121 and 135 operators but was not 91, or 129. Thus he stated putting guidance in that ACs did not seem to fit.
- He spoke to the moving of Notice information into 8900.1 but said they have yet to grapple with that. Finally he re-stressed that Notices by their design are expedient but needs to be cancelled and re-issued and not amended as industry was proposing. Tom Atzert rebutted Tom Hellman's contention that moving the Notice into 8900.1 was the best option. He stated that the industry group felt an AC would be better but there isn't a convenient AC that addresses all users? That said he stressed that the Notice as was issued is totally untenable as written.
- Todd Schooler (Cessna) stated in regards to vendor, manufacturers, the publishing of specific P/N data for interchangeability in DDGs is problematic. He said that after publishing such information, production discontinues, components get upgraded, and the published guidance listed in dispatch documents becomes out-dated. Roger Lien (Pinnacle) stated the configuration control is more appropriately controlled via the IPC.

(Continued)

IG 90 AGENDA DRAFT 00

90-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief(Continued)

f) Greg Janosik (AFS 240) agreed stating that the practice is something that appropriately should be controlled by the maintenance program as this is strictly a maintenance issue. Greg then stated he felt this AFS 300 guidance needs to be ultimately placed is both an AC and 8900.1 He stated that POIs do not see or follow ACs, they use 8900.1. Greg summarized that this is not an MMEL PL issue as it is strictly a maintenance issue and he will work with AFS 300 to ensure whatever guidance that is needed is appropriately issued.

g) Tim Kane stated that he understood that this is not a PL issue but the stressed that the existence of the current Notice is causing concerns to operators as POIs are reacting to it and directing operators to create what he felt are unnecessary MEL revisions. He stated the workgroup will remain in force and monitor FAA activity on issue but otherwise this agenda item will be CLOSED.

Action Item: Workgroup to monitor and report.

IG 90 (See Attached File)

ACTION: Provide update

- Discuss feedback provided and follow-up as required.

LEAD: Tom Helman/Tom Atzert Work Group Leads

Item remains OPEN

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90.07: CFR 382.63 - What are the requirements for accessible lavatories?

Objective: The Deputy Assistant General Counsel, Office of Aviation Enforcement and Proceedings, U.S. Department of Transportation is scheduled to attend and speak to the group on the issue.

Item Lead: Greg Janosik

Discussion: Related to agenda item 86-11A PL 128 Lavatory Call System – PL Comparison.

IG 86:

Greg Janosik introduced Anne Bechdolt of the FAA Chief Counsel's office, and DOT Deputy Assistant General Counsel Blane Workie who spoke to issue of DOT Part 382 rule and PL128. Blane began by stating her organization works closely with FAA to ensure operators are in compliance with the Air Carrier Access Act implementation regulation CFR Part 382. She then outlined the scope of PL 128 regarding the requirement to maintain a wheelchair accessible lavatory and certain associated equipment such as call light, grab handle(s), and not being able to place these on an NEF list. Blane stated her agency is aware of the concerns that operators have on this subject and are open to a review on the feasibility of extended relief and whether relief should be NEF or MEL, and if MEL, what category should be used.

Anne then echoed Blane's comment that DOT and FAA are revisiting this PL issue to determine if relief is feasible, and to what extent relief should be provided. She stated the outcome of their deliberations will be presented at the August MMEL IG. They want to hear the concerns of the industry group members present so those concerns can then be taken in account during their review. Several members questioned the determination of whether or not these items will be deemed to be NEF, or MEL and associated repair category. Anne restated that all this is under re-evaluation. It was asked if this FAA/DOT review board would allow an industry group advocate to attend and advise them on industry concerns. Anne stated that is the purpose of her's and Blane's attendance at this IG.

Paul Nordstrom (Boeing) requested they ensure that their decision will be based upon maintenance of an acceptable level of safety, the benchmark for MMEL relief.; he stated that the act of even considering the lavatories as being the subject of MEL does not make sense as they are not safety of flight items. Yet he conceded that under current regulations it is in the best interest of a carrier to consider maintaining the lavatory. He then made the analogy that high rise buildings contain multiple handicap facilities but they do not shut down an entire building when one of them becomes inoperative. He stressed it is not the intent of airlines to discriminate but maintain the highest level of service for everybody with minimal impact on any single entity.

Blane countered with the objective of the DOT is to ensure compliance with accessibility and not so much as with the vehicle used to maintain it, i.e. NEF or MEL. Instead they have separate authority from FAA to assess if violations have occurred and whether or not fines are warranted, indicating that the fine is $27,500 for each violation. She then stressed the balance of considering flight safety versus passenger safety and that there is a safety implication related to an inoperative call light or lack of availability of grab bars, etc.

Candice Kolander (AFA) stated that the impact of having inoperative handicap lavatory falls upon the flight attendant and for the benefit of her represented group it is preferred that the lavatory remain in MEL and not NEF. Tim Kane (JetBlue) stated that he felt that there is a degree of misunderstanding as to the level of control of NEF versus MEL. Some discussion was held on the appropriateness of NEF versus MEL. Anne spoke up and stated that from her department communications with operators it appears that since inception of PL 128 the time taken to bring an inoperative lavatory back to service has become shorter, from an average of 4-7 to 3 days. She stated thus there is a difference as to what program is used to fix the item, NEF or MEL.

(Continued)

90.07: CFR 382.63 - What are the requirements for accessible lavatories?(Continued)

Some group members expressed concern about the accessible lavatory been treated differently, more restrictive than other lavatories. It was stated that Legal should only consider if it is reasonable to give industry relief and what components of lav need to be included. Anne stated she keeps hearing the group state 'and give relief for some period of time.' Anne stated Legal needed more feedback on what the group felt is an acceptable amount of 'some time.' She asked is it 3 days or 10 days? Don Reese (AAL) questioned why a wheel chair accessible lavatory must be made available when it is legally permissible to MEL, depending on route and flight time, multiple, even all, the other regular lavatories? Another member stated his people based on reading of PL come to different conclusions of what must be MEL'ed and what not. Anne stated PL 128 as written only addresses the accessible lavatory. Then she stated from what her department has heard from carrier's, leads them to conclude that interpretation and thus application of PL has not been consistent.

Anne then cautioned the group that there are other things addressed in Part 382 that are a part of the handicap accessibility requirements beside just the lavatory, she mentioned aisle armrest and wheelchair stowage space as examples. She stated that as they further study the issue they will taking all these other factors into account. A group member stated there is too much ambiguity when the PL uses terms such as 'and other controls' to describe the scope of components that DOT wants carrier's to make accessible to the handicapped. He stated it is unfair to state enforcement will be pursued when he has used best faith to correctly interpret the requirements.

Blane stated they have a website **http://airconsumer.ost.dot.gov/SA_Disability.htm** that has several documents that give guidelines on accessible lavatory requirements. She stated that these documents are not so much for FAA use but DOT's. She then stated it is standard convention in legal documents to use such 'catch all' statements as 'and other controls' because future circumstances and requirements can change and everything cannot always be anticipated on initial writing of a rule. She then stated as far as accessing whether a civil penalty is appropriate they look at numerous factors such as how much effort was taken to restore the equipment, whether or not there is history of non-compliance, passenger complaint filed, etc.

Tom Atzert (UAL) commented that there have been meetings on the topic in the past where not all stakeholders were present. He stated it is imperative that from now on we all need to come together to achieve a workable solution. He then stressed that while appropriateness of use of NEF versus MEL has been brought into question, the NEF is a part of the MEL and has been a successful tool. He asked for details as to how many fines have been levied? She stated she did not have statistics to give. She stated that due to limited staffing they do not have the ability to actively monitor operators so they are reliant
on FAA safety inspectors to provide details. Plus due to lack of manpower they only open an investigation if a significant amount complaints are received.

Final comment was made by Tom that A4A has developed a PowerPoint presentation that demonstrated that prior to PL 128 the NEF program was successfully used to address the lavatory issue and that it addressed, and met the spirit of intent of the Part 382 rule. He offered it to DOT for their review. Candice Kolander (AFA) asked to be provided a copy of this presentation.

(Ref. meeting minutes bookmark A4A – MAINTAINING CFR 382 and non-382 Like Items.ppt. Note: This item was submitted to DOT with A4A branding on March 30, 2012).

(Continued)

IG 90 AGENDA DRAFT 00

90.07: CFR 382.63 - What are the requirements for accessible lavatories?(Continued)

IG 87: (Ref. A4A-Maintaining CFR 382 and non-382 Like Items)

IG Chairman's Note – Subsequent to IG 86 it was reported that Anne Bechdolt has left the FAA Chief Counsel's office for other duties.

Action item: Greg Janosik – Update the IG regarding the status of CFR 382 and PL 128.

FAA Legal representative, Dean Griffith, who is replacing Anne Bechdolt (FAA Chief Counsel's office), stated no updates as of this meeting. He stated they are to meet on this topic third week of August and hopefully some outcome will be available for next meeting.

Doug Mullen (A4A, Assistant General Counsel) spoke to issue of FAA enforcing CFR 382. He stated when looking into revising PLs the group needs to be aware of the authority within the rule(s) regarding the authority of FAA to enforce this rule's requirements. He stated per A4A's reading of the statutes and delegated authority to implement or enforce this rule lies solely with the DOT. Thus he thinks the efforts by FAA to work with DOT is noteworthy, i.e., FAA inspectors to observe and report finding to DOT is a good practice. But he stated FAA should not be using the CFR 382 as a means to change policy or influence changes to industry practices as that constitutes an attempt to enforce rule requirements; he re-stated FAA does not have that delegated authority. He cited two specific CFRs 1.47 and 1.74 that speak to Delegations to FAA Administrator and Delegations to the Under Secretary for Transportation. Doug concluded with statement that FAA should therefore remove all references to CFR 382 from PLs as 128, 116, 104, 25, and 83, etc. FAA Legal representative stated they will take into account both issues raised, jurisdictions and PL inclusion, under consideration.

Item remains OPEN.

IG 88

Item Lead: Greg Janosik (FAA)

- Provide update

Item remains OPEN

Greg Janosik (AFS 240) stated that PL 128 has been withdrawn from active PL list. He introduced Dean Griffith (FAA Legal Chief Counsel Office) who stated that as a consequence to an A4A legal challenge over jurisdiction, enforcement of DOT rules residing with DOD, not FAA, thus the PL and all associated changes related to PL128 are to be undone (removal all references to CFR 382 from PLs as 09, 116, 104, 25, and 83). He stated FAA intends to treat wheel chair accessible lavatories as any other non-accessible lavatories, basically to be treated as NEF items. Dean stated DOT intends to communicate this policy change to all affected air carriers. He stated they still expect air carriers to continue to comply with Air Carrier Access Act.

Greg re-confirmed that changes to other PL affected by introduction of PL 128 are to undone and instead of going to comment grid will be immediately released. He states at same time a Notice to Field Inspectors will released notifying air carrier of immediate change. He stressed that the impact is only against operators of large multiple aisle aircraft operated under Part 121. Tom Atzert (UAL) requested this Notice be written in a manner that operators are expected to make immediate MEL revisions. Greg stated the timing will have to be coordinated with AEGs, but something like 180 days or next FOEB.

Discussion on if this agenda item is to be closed, and if so if another item opened for tracking purpose, ensuring group is informed of progress in revising the affected PLs, etc.

OPEN new item for update

(Continued)

IG 90 AGENDA DRAFT 00

90.07: CFR 382.63 - What are the requirements for accessible lavatories?(Continued)

IG 89 (Attach PL83 R6)

Item Lead: Greg Janosik (FAA)

- **Provide update**
- **IG Members have observed changes to 767 MMEL that are inconsistent with PL-83 expectations**

Greg Janosik (AFS 240) stated that the four PLs that were changed to reflect accessibility of wheelchair lavatories are being rescinded. He stated he plans to create a Notice to field inspectors regarding this revised PL state.

a) Tom Atzert (UAL) stated that there was a problem with revised PL 83 that incorrectly addresses wheelchair accessible lavatories.
   - He outlined how PL 83 _R6 rather than remove restriction of wheelchair accessible actually imposes it and this have already been inserted, published in 767 MMEL, and draft of 747-400.

b) Paul Nordstrom (Boeing) stated this change has been populated by SEA AEG not Boeing.

c) Greg Janosik stated that this was counter to what is intended. He stressed that the intent of rescinding PL 128 was to restore previous mode of relief that existed prior to issuance of 128.

d) John Pinnow (SEA AEG) stated SEA AEG will correct this apparent intentional oversight.

Action Item: John Pinnow (FAA AEG SEA) and Greg Janosik (AFS 240)

Item remains OPEN

IG 90 (Attach PL83 R6)

ACTION: Review PL 128 Lavatory Call System – PL Comparison with CFR 382.

LEAD: Greg Janosik (FAA)

- Provide update and/or closing action

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases

Objective: Modify current PL MMEL provisos by removal of proviso b).

Item Lead: John McCormick (Fed-X)

Discussion: A current navigation database for an FMS/INS aircraft provides the capability for an aircraft to fly point to point (waypoint to waypoint) without being dependent on ground-based Navaids as a back-up navigation source (assuming no operational restrictions on the route being flown, e.g., DME/DME or GPS update). If the database is not current, but a procedure is established for verifying the accuracy of the waypoints being used, as is required per current Proviso "a)" that outlines the requirement of verifying the waypoints (Navigation Fixes), the aircraft will navigate with the exact same accuracy as an aircraft with a current database.

Current Proviso "b)" seems to imply that ground based Navigation Facilities are required to be used for the enroute portion of flight. The use of such facilities is not necessary if all Navigation Fixes are verified to be valid for enroute operations using available aeronautical charts (as is already directed by proviso a). I believe that proviso "b)", as written, should be deleted. If a ground based Navigation Facility is "required" for any particular operation, then current practices require that its status be checked through the Notam system (standard operational procedure). Under this strict interpretation that ground navigation facilities are to be used, aircraft would be restricted to filing standard domestic Airways and not able to operate on oceanic, polar or RNAV routes, or any other operator defined custom routes?

As a minimum, the intent of proviso "b" needs to be clarified, and the wording of the proviso revised.

IG-79:

Meeting mini-meeting conducted on August 19, by Terry Pearsall from AFS 350. Terry to adjust latest PL 98 to include manually tuning approach aids, then post for comments. Discussed were effects on the following operations: RNP 10, RNP 4, RNAV 2, RNAV 1, RNP 0.3 and RNP AR. No SIDs or STARS are allowed with out of date nav data base.

IG-80:
Pete Neff tried obtaining the latest draft PL-98 from Terry Pearsall.

IG-81:
Bob Davis update – FAA is working on this internally. John McCormick suggested the MMEL IG working group continue to be involved.

IG-82:

Bob Davis (AFS 260) opened the discussion with reports they are negotiating with charting world to develop charting standards to eliminate operator concerns with this PL.

89-09. PL-98, Navigation Databases (Continued)

Pete Neff added that the Air Nav committee is evaluating enroute Nav Aids that are currently re-named and published if moved >5 miles will be choked down to movement > 1 mile. Discussion on approach limits discussed. John McCormick expressed that he is concerned that the alternate procedure approach

already placed in draft PL 98 is not removed. Pete Neff stated they are concerned that if the US nav data limits are changed how that may dovetail into foreign requirements? Part 91/135 operators present who operate worldwide stated concern that PL 98 wording currently does not impact them. If PL-98 gets a GC header and C category relief it will negatively impact them. Pete Neff states FAA will entertain breaking PL 98 out into several versions by Part of operations, 91, 135, 121, etc.

(Continued)

90-08. PL-98, Navigation Databases (Continued)

Finally, John McCormick (FedEx) stressed the need to preserve distinction between aircraft that can be flown by charts without FMS versus those that must be flown with FMS (doing otherwise presents a risk).

Action item: FAA 260, Lead: Terry Pearsall

IG 83:
FAA reported current status on the Air Nav committee that location movement of more than a mile of a nav aid will result in a name change and charting update has been checked with ICAO guidance and is found to be acceptable. Dennis Landry questioned the status of the latest version of Policy Letter guidance (PL 98_D10) that he stated it is the version that ALPA upper management finds acceptable and what he referred to as the draft that represents the industry consensus now appears to be languishing, awaiting final FAA acceptance and no action? He reports it is now five years since the initial drafts of this PL.

Todd Schooler (Cessna) at this point raised the objection, on behalf of the private owners / national biz jet community, to the imposition of a C category. Todd contented that the current version of PL is only suitable for large aircraft, Part 121 operators, but does not meet the needs of the general aviation aircraft that have the equipment (FMS) but for which it is not necessarily required by certification, and he gave certain examples of how it was too restrictive. Dennis objected to any suggestion of less restrictive category and argued that if a private operator is flying with an out-of-date nav data base because they do not chose to pay for a subscription to navigation service provider, then they are at minimum in violation of current MMEL and more. Todd re-stated that there is no requirement for them to do so.

Pete Neff (AFS 240) re-iterated that after confirming the adequacy of using backup current aeronautical charts with the new decision to choke the movement of nav aid movement down to < one mile versus previous < 5 miles that the current draft is acceptable. Pete also countered that FAA could 'choke' down the PL draft even further to delineate requirements such as VMC only capability when FMC is inoperative, etc., for those GA type aircraft. Dennis, supported by John McCormick (FDX), expressed that they felt if a GA jet have this equipment, are flying RNAV, and operating in modern day airspace, they should be complying with the same standards. Pete again suggested that FAA could break the PL down to different relief of each Part, 121, 135, 91, etc., that would allow for different provisions, repair categories. Dennis then expounded upon how any further changes risk 'backlash' from his people at

ALPA National. Todd retorted that maintaining the C category would invite equal backlash from the NBAA, GAMA owners / operators.

Discussion then moved to the draft PL wording. Numerous comments then were raised as to the appropriateness of draft NOTES 1 & 2, plus the citing of 14 CFR 91.503 in NOTE 2. Dennis defended the NOTES as being purposely designed to ensure aircraft can be operating under the new 'NextGen' rules and will have the tools to do so safely. Discussion also centered on the appropriateness of citing specific a 14 CFR in the NOTE 2. Suggestion was finally made that draft to be posted for comments and the group allow the industry at large to comment on these issues.

At this point Todd re-surfaced the fact that there is no legal requirement for GA aircraft to have FMS and / or maintain it. Greg Janosik countered that there is AC 90-100 and other references specify that you must have a current onboard FMC database for terminal enroute area operations. Todd then objected that the PL 98 draft is directed towards large turbine multi-engine aircraft and will be ignored by the GA single engine operators. Last of all, the only agreement was to post draft 10 for comment.

Item remains OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

IG 84:

Greg Janosik stated that he felt this was going nowhere as drafted and posted. He commented on the lack of comments this draft has garnered. He stated in its present form the draft did not represent the substance of what has been recently discussed on this topic. He inquired who the Lead is, the answer given was FAA. Greg rejected that position and re-iterated that he could not adequately address what the problem was from industry's perspective. He charged the committee to re-establish a working group to re-formulate industry's position on the PL. John McCormick (FDX) was assigned as Lead. Sub-group members chosen were Tim Kane (Jet Blue), Todd Schooler (Cessna), Dennis Landry (ALPA) and Scott Hofstra (UPS).

Item remains OPEN.

IG 85: (No attachment)

John McCormick (FDX) outlined some background to current status, five years in draft phase, on NavDB Currency. He presented his reworked draft outlining changes, the first of which was an answer to how the workload issue of verifying route data. The draft listed some means by which verification can be achieved by alternate means such as dispatch organizations, or dispatch type organizations in conjunction with the pilot, or by the pilot only. He spoke at length to the means of validating versus verifying the data but ultimately stated that if it cannot be verified it should not be used. He reported there was several different ways to verify the data. He listed several advisory circulars (ACs) that talk to a manual verification. He then outlined how there are existing software applications that can compare NavDBs and provide user with a full, detailed report of changes, additions and/or deletions in the new NavDB data. He reported that while the methods to verify data are different and not all operators can use the same process it does not matter only that they if they want to use the data they must develop a process to verify it.

89-09. PL-98, Navigation Databases (Continued)

John mentioned an exception for RNP AR (SAAAR), AC 91-101A, states you cannot have an out of date database, period. He mentioned that it has been demonstrated that the wrong database can be loaded on an aircraft and that a database can be corrupted. He pointed out a note in his draft that this relief is strictly to be used for out of currency issue and not other issues. He then explained how on some aircraft the information in the database is used for auto tuning of the navigation radios and presented provisos for this condition which began with basic proviso that for aircraft with database out of currency that navigation radios are manually tuned and identified (required for airplanes which automatically tune based upon data from FMS Navigation database). He then mentioned how consensus was reached with his work group teleconference that PL could have two basic levels of relief for NavDB out of currency:

1. Conventional Procedures only: the operator cannot fly RNAV procedures, and must file and fly conventional NAVAID procedures.
2. Limited RNAV (non-AR) Procedures provided alternate procedures are established, to verify data has not changed for the flight's operation.

John then re-stressed that if you are going to use the out of currency database then the data for the planned operation needs to be verified. He asked if the group was comfortable with that assumption. Numerous concerns from group and a minor degree of discussion on auto tune capability within industry occurred. It was agreed that based upon this consideration this proviso may need to be deleted from draft. John's next point was that if data for route is verified then there should be no problem operating aircraft safely with an out of date database. This lead to a counter from an individual in group that when a diversion is in order that portion of database potentially has not be validated and could place undue workload on pilot at critical point of time. This was countered with comment that the aircraft dispatcher should have checked all alternates with the intended route of flight or the approved procedure that the operator comes up in order to take this relief should account for this, he stressed we should not get locked into how individual operators handle this. This was debated at some length.

(Continued)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

Next the notes 1 and 2 in remarks and exception column of John's draft were presented. The first which list references to ACs that operators should consult in development of their procedures. It was decided that a more generic description of suitable reference material would be better. The second was critiqued and too wordy and overly laden with regulatory guidance and it was suggested that this information should be moved to the PL discussion block and Pete Neff suggested a reference section of PL for this information.

Next the second mode of relief was presented that states may be inoperative if RNAV (RNP) AR is not to be flown. This mode of relief is intended to address those operators who chose not to validate the data or operate with a current subscription service to a service provider, etc. Bottomline to draft, if they want to operate in advanced “NextGen” airspace an operator must have a procedure to validate the navdata base and if you don’t check the database you don’t get to play.

IG 86: (Ref. PL 98 R1 D10)

As of 03-27-12 PL 98 R1 D10 remained posted with comments due by 04-20-12.

John McCormick (FDX) opened the discussion stating he thought that since there is no industry comment on PL98_R1_D10 it should be acceptable; Greg Janosik (AFS 260) disagreed stating he had several issues with draft PL 98. He began by stating that the work done to date has been outstanding, and then offered a PowerPoint to illustrate his concerns, the first being the repair category “C”, the second being the minimum required for dispatch is 0 (Ref. meeting minutes bookmark “Janosik – PL 98 Issues.pptx”). . He then presented MEL CFRs, 91.213, 121.628, 125.201, 129.14 and 135.179 which are the CFRs that authorize an operator to have an MEL. He asked where in these CFRs is software listed as an item that can be inoperative? Next he presented 121.349, 125.203. 129.17 and 135.165 that state that the equipment requirements to fly IFR overwater operations is to have two independent navigation systems suitable for navigation. He emphasized that these regs stipulate two independent systems are required. He then stated that this precludes the min required of 0. He made his third case that the out-of-date nav data base equates to a FMS system operating in a degraded mode and this is not a condition he felt met the dispatch requirement of having two fully independent nav systems. He then re-touched upon his objection to the C category use being too long a period to be operating in what he felt again is a degraded mode of operation. Finally he stated having a minimum of 0 leaves no motivation of due diligence to check the accuracy of nav data. He concluded that for these reasons he sees no option but to have PL 98 dis-approved and thus MMEL relief for nav data base be deleted.

Todd Schooler (Cessna) made counter comment that all this is fine provided you are an 135 / 121 operator. His operators are Part 91 and this PL does not address them. John McCormick (FDX) challenged Greg’s contentions. He asked what is wrong with C category? Greg pointed to his third point, the need for two independent nav systems. John countered that the issue is of one database supporting two independent FMS systems thus -/0 works and it does not represent a degradation of FMS. Conversation pursued that the intent of the original PL 98 was to enhance safety for future NEXT GEN nav and FAA should support that. Taking the relief away will ground entire fleets just because of a late vendor delivery or delivery of data base with a missing data point, etc. Instead the procedural guidance that has been negotiated within the draft work on PL 98 will achieve an enhanced level of safety as it mandates the operator must have a procedure to check the data for changes between old and new and provide the differences to the pilot via a means such as a listing of routes, approaches, etc. that may be not be flown. Further, as specified by AC 91-101A, RNP AR procedures, the AC expressly does not allow such procedures to be flown period when the database goes out of date.

Jim Foster (SEA AEG) also brought up the issue that he felt this is not really applicable to the MMEL and should be moved to another forum. John echoed that by stating he agreed as this is degradation of software and not a hardware issue which is the usual function of the MMEL, yet he and with industry support, ALPA in particular, felt that this is a unique issue that is best handled by the MMEL. The argument was that it is far more preferable to allow continued use of the FMS, particularly on large category aircraft than force the shutting down of the FMS. Greg thanked the group for the inputs received stating all the comments of industry will be taken back to HDQ for further consideration. He expressly asked to see demonstrations of how operators validate the data. John offered to provide an example of how FDX validates data.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

Action Item: **John McCormick -** Provide the requested example of how FDX validates data.

IG-87: (Ref. pl-98_r1_d10 & pl-98_comment_form)

John McCormick (FedEx) began the discussion by opening, as he has done so at the two previous meetings, asking that if an operator can devise a way of determining what has changed in the database from rollover of one to another would the group consider that be safe practice. He mentioned that initially ALPA has some concerns and they have been resolved and reflected in latest draft. He stated the latest draft 10 to PL has now been out on web for comment for near on two months with only one comment from Cessna. John asked if there was there were any other comments. Nobody spoke up and thus John stated he felt the PL should therefore be allowed to go to final release.

John then outlined that if operator does not check the data, then the aircraft cannot be operated in RNAV, RNP, RNP-AR and essentially can only be operated as a using analog, 'round dial' gauges, charts, VOR/DME equipment, etc., and not FMS navigation. He stressed the improved provisos in draft 10 would allow use of FMS navigation on routes that have been verified as unchanged. This is vast improvement and enhances safety. He also emphasized that the checking of the data needs to a coordinated process involving the operators dispatch organization and/or use of an Air Nav specialist using tools that are commercially available to bit check the data.

Gary Larsen (FAA SEA AEG) asked a few questions on how the data could be marked, identified as unchanged. John stressed the methods used can be various and it is better addressed at the operator level than within the policy. The PL should only mandate the requirement that data must be checked. Gene Hartman (FAA LGB AEG) asked if the nav data base becomes out-of-date can the aircraft retain its /R designation. John stated yes it could as it is still an RNAV capable aircraft, it just cannot fly an RNAV arrival/procedure(s) that have changed. A question was asked regarding how would a divert to an alternate be handled. John explained the operator needs to provide a list of all possible alternates along the planned route denoting those not changed, thus usable, etc. He concluded that it is much more a dispatcher responsibility as when an aircraft has declared an emergency as they, the dispatcher, would have the same data available as the pilot and more time than pilot.

Todd Schooler (Cessna) stated this was fine for large transport operators but not so for his operators as most are single owners with no dispatcher. Furthermore, he has had conversation with the manufacturer, Garmin, regarding how they recommend operating with an out-of-date nav data base. They stated no way. They do not certify their equipment without current data, etc. He stated their AFM supplement list the alternate procedures to use in lieu of FMC. He stated all this was outlined in his comment to PL draft 10 on the FAA website. He concluded he has asking for separate Part 91 relief for some time to no avail and he does not plan to implement PL 98 relief for Cessna products as there is no legal requirement to do so.

Chad Tarara (Pinnacle) spoke up that he felt proviso a) needed revision. He stated he is overall OK with the relief but would like to see alternate wording as the current proviso implies that no change can exist in data base. He stated he believes that the intent is that only data in the data base that can be verified as accurate can be used. John agreed but with the exception to Chad's suggestion that operator must be able to check the accuracy of data. He stated accuracy of data is a responsibility of the vendor who develops the database, He felt operators can determine where changes have occurred but it is beyond their ability to determine if the data is accurate.

A member from Alaska Airlines expressed their strong support for John effort to improving this process stating they have been using RNAV procedures to remote Alaskan airports for more than 15 years now. Yet he disagreed with John that this is not a safety related issue. John clarified his statement that it is safe provided the procedures are followed. Brian (Alaska Airlines) clarified that the language of existing PL is what has frustrated them and John draft is an improvement.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

At this point, Greg Janosik (FAA AFS 240) asked the question, "How would we operate if MMEL did not allow this relief." John stated he felt many would ground the airplanes as without the data base the FMC would be considered as not performing it intended function. Todd Schooler (Cessna) stated he strongly disagreed as per their vendor they could not certify FMC if that was the case. He stated FMC functionality is working fine except for the navigation part. Discussion then centered upon differences in FMC design, use in Part 91 versus 121.

Greg then asked what item of equipment is being allowed to be inoperable. He contended that the CFR that authorizes an MEL, CFR 121.628, states only instruments and equipment can be inoperative. It does not include software. John attempted to counter but Greg interjected citing John own statement from previous meeting where in response to an AEG argument that this relief does not belong in MMEL, John stated "..this is degradation of software and not a hardware issue which is the usual function of the MMEL." Greg then re-stressed his question "What is inoperable." He stated he needs to better understand what is being addressed by FAA allowing this relief to stand. He outlined three objections:

- He cannot determine how nav data base software applies to MMEL relief.
- He is troubled with relief giving operators 10 days to update their FMCs
- He feels this MMEL is being used to accommodate not an equipment failure but a vendor supply problem, and that is an inappropriate use of MMEL.

John countered with fact that once the data becomes out-of-date a principal function of FMC, navigation, can no longer reliably be performed and that meets the definition of the term 'inoperative.' Greg disagreed, Todd Schooler (Cessna) disagreed, especially since this PL will impact equally large transport (121) and his smaller private jet, general aviation community, a group who have FMC(s) installed but are not required to maintain active subscription service for nav data. John asked if the group felt that aircraft being operated without current data was not a major safety problem. He stated he did, that it obviously was a concern six years ago when ALPA opened this item. John stated his revised procedure greatly enhances safety.

In support of John's position another operator gave several examples of other MMEL items that do not render system inoperative; instead the system is operating in a degraded condition. Greg agreed but stated when FMCs nav mode is not functioning it does not preclude flying the aircraft by other means. John countered that was not necessarily true, safe, or efficient way to fly sophisticated aircraft in the NAS.

Greg then asked another question, "If operator was not under guise of MMEL relief how would they operate?" He then answered his own question by stating the operators would fly the company procedures pertaining to an out-of-date nav data base to ensure they are flying safely, correctly and as appropriately within the NAS. This lead to lengthy counter points from industry members present. Roger Lien (Pinnacle) stated this was perfect reason for needing this relief in MMEL as any write up against it needs to be cleared or be able to be deferred before flight. Further, he stated he had no other means of conveying operational alternate procedures. Todd Schooler countered with question of why was MEL was needed for FMC data base but operators are able to handle 'other' data bases outside the MEL such as TAWs and one the he referred as Chart View. John McCormick requested topic remain centered on FMC nav data base as item that is being considered.

Greg Janosik concluded that an FMC cannot be item considered inoperative as per John's recommended procedure as operator is using the FMC navigation function to fly the aircraft. John stated "Yes, because that portion being used has been verified as unchanged." Greg retorted that for an MEL to be used some piece of equipment must be inoperative. More analogies to other equipment were offered by members of industry. Greg stated he could not see the MMEL as the appropriate means to handle software issues and operators should consider managing it as an ACI item.

He stated the operator should get together with their POI and devise a procedure on how they will handle operating with out-of-currency data base. He stated he envisioned that procedures followed under the ACI would be essentially the same as those proposed by John's proposal and as an added benefit an ACI would not carry a category for repair. He then added that he felt it would force the operator to work closer with their vendor to ensure more timely and accurate data packages.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

John McCormick stated he felt this was more appropriately addressed as a national policy issue than an individual, local level issue, He stated as an MMEL PL it ensures a uniform practice is established. He stated also it provides a level field not to just AEG chairman but to POIs also. Discussion when back to subject of what is inoperative

George Roberts (Delta) stated we have been focusing on database being out of date when the MMEL should be used for inoperability of some piece of equipment such as physical damage to data loader port or an electrical connector that precludes proper functioning of FMS. Database out of currency is not a mechanical malfunction, FMS is considered fully functioning and thus Greg considers this is a vendor / company problem that FAA should not enabling by approving this MMEL.

Several operators questioned the wisdom of having to determine root cause of what lead to an inoperative piece of equipment, as in this case, reason why the nav data base expired, as a defining factor in determining acceptability of MMEL relief. Numerous examples were given and caution in setting precedence was given.

John agreed to take the points discussed under consideration and re-draft PL.

Action item:
John McCormick – Fed Ex
George Roberts – Delta
Todd Schooler – Cessna

Item remains OPEN.

IG 88 (Ref. pl-98_r1_d10 & pl-98_comment_form)

Action-

- John McCormick to provide workgroup update.

Document Title:	PL-98 Rev-1 D10 (Nav Data)
Summary:	Draft ten, twenty eight Feb
Document for Download:	Draft Document (MS Word) Draft Document Comment Grid (MS Word)
Comments Due:	11/15/2012

Item remains OPEN

John McCormick opened with comment that this PL has been a long ongoing unresolved process and he felt need to clarify industry position that operators are not using out of data thus unreliable data. He was referring to the comments from Mr. Schubbe (FAA AEG SEA) on PL comment grid. He stated the premise of Mr. Schubbe's position that operators were using incorrect data. John stated in the contrary the intent of the industry groups procedure was to verify what portion of the database is in fact unchanged and hence is accurate and safe to use with the caveat of employing all the normal processes of ensuring safe operation. He thanked Mr. Schubbe's stating the industry agrees that we all do not want to use out-of-date data.

John then moved on the comment of AFS 240 at last meeting that the MMEL cannot be used to cover up a part supply, vendor problem. He stated he attempted to revise the draft as was requested to address equipment issues and not a process control issue but he reported it did not 'come out right.' He states he sees is as a software issue that may not fit the tradition MEL condition but if followed enhances safety.

(Continued)

90-08. PL-98, Navigation Databases (Continued)

He restated the background of the problem that lead to this current draft and stated the industry does not want abandon the effort of the last six years.

An FAA member stated that he believed Mr. Schubbe's position is the MMEL is not a correct avenue for handling this type issue. John questioned what was then the correct avenue? John countered that for operators the MEL is a standardized, normalized process that ensure uniform application and he felt if FAA mandates it deletion from MMEL then that would result in haphazard handling leading to overall reduction in safety. He stated that he can conceptualize FMS navdata function as being a software part number that therefore can be MEL'ed just like a part, component, provided provisos are in place to ensure adequate safety be assured, and then the operative portion may continue to be used.

The member from the FAA stated he understood that Mr. Schubbe's position is regardless of whether or not there is a process it is just not regulatory allowed. John questioned what regulation was the FAA stating 'does not' allow for use of data. He cited knowing of only one particular AC, related to data and that's AC about RNP AR procedures that specifically states operator must be able to extract information from a current database. John stated that was the reason industry draft specially excludes RNP AR procedures when data currency is out-of-date. He state the other regs that Mr. Schubbe cites in this comment only states one must use current database and the industry proposal is verify the data what is unchanged and use only it. John stated that he welcomed Mr. Schubbe comments as he stated each time someone critiques the PL draft it forces a revaluation that has led to it been improved.

Greg Janosik (AFS 240) commented that he has come around to agreeing that he sees that a degree of relief needs to be provided. He stressed that his of concern is that it is a situation of not doing something correctly but doing just something open ended, without a time limit. He said it analogous to over flying aircraft with a life limited part on aircraft. He suggested PL could be drafted to state that the FMS cannot be used as a primary means of performance based navigation once the data expires. He outlined that this could be extended to a D category interval. The group at large adamantly disagreed. Numerous examples were given how this approach does not meet with reality in the working environment.

Greg re-stressed that with an out-of-date navdata base operators will not be using FMCs to conduct performance based navigation. He stated this was the FAA position, line in the sand. Industry members disagreed stating this is everyday occurrence when database dates rollover. Aircraft begins a flight on current database that expires inflight, it continues to destination, etc. Discussion continued around this FAA position. The issue of what is purpose of the expiration date was discussed. Industry stated it was arbitrary while FAA related it to being considered a time change unit, once the date is reached it is no longer usable.

Greg continued by stating a rule is in the making that when released that will re-vamp the processes that operators will have to follow in updating data bases. Discussion was held on nature of data loading process used today and went on to discuss a new USB, data storage medium device that is available. Discussion regarding whether or not the fact that this new rule, newer equipment, would resolve the out-of-date issue as there will still be legacy aircraft flying needing to use the current time and labor intensive process.

Dave Stewart (Air Transport Business Development) asked what is the FAA position on this item becoming an ACI rather than MMEL relief. Tim Kane responded that it not a FAA objection but an industry objection to use of ACI as it would lead to disintegration of standardized practices across the industry.

Dennis Landry presented a Delta Dispatch Bulletin that outlines a procedure that has been FAA accepted that requires the employment of dispatcher to validate that the planned route data has been validated and communicates this to the crews. He stated this process assures the aircraft can continue to safetly operate with FMS providing the primary means of navigation. He stressed that to take the stated FAA position would be significant step back from safety. He stressed a solution needs to be sought. Comment was made that having ALPA's endorsement of the industry draft proposal was a significant event.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

Finally, it was proposed if FAA Mr. Schubbe, could be invited into the industry work group and that workgroup reconvene ASAP. Another recommendation was that Washington AFS 420 and RNAV workgroup representative are also brought onboard to hammer out a solution. An industry comment was that the draft proposal already prohibits the precision arrival, approach procedures (RNAV AR) from being flown when navdata base expires. After much discussion it agreed that workgroup be expanded and proposed draft be moved forward.

Item remains OPEN.

IG 89 (Ref. pl-98_r1_d10 & pl-98_comment_form)

Action-

- John McCormick to provide update.

a) John McCormick (FDX) stated he has talked to the FAA commentator of draft PL 98, Mr. Bill Schbee, and they spoke to the concerns that were posted. John then announced that ALPA national counsel has presented current draft PL 98 to it membership and have received an almost unanimous decision from the members that the draft PL meets all their original concerns. John then spoke to Cessna's comment on comment grid that current draft does not meet the needs of their operators. John reported that Cessna had withdrawn their concern stating they will be addressing this issue via AFM limitations versus PL.

b) John then returned to his discussion with Mr. Schbee. John reported that the primary point that Bill stressed during their discussion was "don't use out-of-date data." John next directed his attention directly to Bill who was present for meeting, reporting to him that the scope of the draft PL does not allow use of out-of-date data. Instead it enhances safety by validating, identifying the data that is unchanged and hence not out-of-date and this then becomes the only data that can continue to be used.

c) Bill spoke to John comments, outlining several regulatory documents, particularly FARs 121-97 and -117 that addresses handling of aeronautical data and that both of these are associated with Opspecs, A-009, that must be used to clearly outline the operators method of compliance. Thus, he felt to achieve the highest level of safety it was ultimately the POI who needs to determine adequacy of an operators procedures. He stated that the AEG recognize that companies like FedEx have the necessary resources to perform the necessary validation process required but they felt this is not true for all operators.

d) Dennis Landry (ALPA) spoke in defense of draft PL stating that the PL is a tool that gives POI the right set of guidance, bullet points, to put into the discussion with their respective operators to ensure a standard application. He stated at the current moment the alternative to using the FMS is for pilots to pull out the aeronautical charts and what was the type of application that initiated ALPA concern. Dennis concluded with that he was not all that familiar with regulatory documents that Bill was eluding to.

e) Bill countered that he questioned if all POIs are as familiar with all the alternative means for compliance for the MMEL relief that PL was proposing. Dennis stated that was what industry was attempting to do, put the necessary framework in place that will allow POI's and operators to come up with a solution that will allow continued utilization of FMS and overall enhance safety. Bill responded that was not what he was advocating at all, its all well and good that PL attempts to impose a standard but his major concern was what he called the disconnect with draft PL and other regulatory guidance, particularly Opspec A009. The fact that this issue is a responsibility of the POI to determine if operator has the capability to do the procedures required. He concluded

f) with statement that the that PL process may work well for the large 121 operators but AEG was concerned with the capability of the smaller operators and their POIs and he stated if there was no such MMEL then these lessor capable carriers would have to go thru the operations specification process, a process he reports work well for everybody.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

g) Discussion then moved on to whether or not this was actually an MMEL actionable item. John McCormick outlined how he sees this as a valid MMEL issue as the FMS is a piece of equipment and he contends that the nav data, while it is software, constitutes a function of FMS, and as such is justifiably MMEL actionable. John stated from a pragmatic point of view taking away this MEL would remove a normal process with checks and balances by which operators move aircraft and thus the removal of this relief would result in loss of ability to continue to move aircraft. He doubted that an Opspec could replace it. John countered that POI has the oversight and approval of inclusion of MMEL guidance into an MEL and hence his oversight is not being side lined.

h) Discussion then was held on the appropriate placeholder for this guidance. Bill Schbee stated that the fact that this is addressed within regulatory documents trumps the MMEL. Dennis Landry asked how is a high level of safety maintained if the guidance in PL is removed from access by the end users, pilots, dispatchers, etc. He stated he did not see how safety is maintained if the FMC was not to be used. Bill referred back to an AC (number not delineated) stating it allows the POI to approve any system that can be demonstrated to meet the objective. He then stated the objective in question is that they develop a system that provides appropriate ground and flight personnel with current aeronautical data to conduct a safe operation.

i) Tim Kane (JetBlue) countered that the system Bill was referring to was actually the system operators use to update the FMS data base and not a system that accounts for continuation of flight once the data base becomes out-of-date. Bill countered that correct but it also can be expanded upon to account for contingencies and it was the something that POI can approve. Tim asked where would the POI get guidance on what are acceptable standards if all that has been historically available, MMEL relief, is removed.

j) A member from industry chimed in with comment that he operates one of the latest series of aircraft that is highly automated and he stated it is very capable of operating safely when functions, systems become degraded. He stated it is no longer the old paradigm of ‘is operative,’ ‘not operative,’ or ‘if performing its intended function.’ He stated now that systems are software driven rather than mechanically integrated the issue, question, of is software a system function will continue to be raised

k) Bob Davis (AFS 240) stated the software functions of FMC is a certification issue and that the current PL-98 was created before the latest high level of automation was incorporated into the NAS. He stated current PL guidance does not fit the current state of art in navigational procedures. He stated the whole point of PL should be to give the mitigation factors for pilot to use to determine if the FMC is taking him to correct location(s). He went over some previous history of PL-98; and its reference to ‘operator will establish procedures.’ He contended that problem has been nobody has adequately demonstrated that they can do so.

l) Bob continued with that under current RNAV procedures there are no tools a pilot or dispatcher can use to validate the data. He stated there is no way for them at time of dispatch to confirm lat /long, etc. Thus he concluded that when data is out-of-date the FMS can not reliably be considered as doing its intended function and hence should not be used for navigating. Todd Schooler (Cessna) disagreed stating FMC perform a multitude of other functions and his operators use the FMC despite not having a nav data base subscription. Bob countered he felt the draft PL was an improvement because it states if you don’t have the necessary tools to determine what portion of data base is not current then you cannot perform RNAV, etc.

(Continued)

IG 90 AGENDA DRAFT 00

90-08. PL-98, Navigation Databases (Continued)

m) Bob re-emphasized that the PL can not continue to state 'alternate procedures are established and used' and that operators expect POI to be able to approve such via an MMEL. Instead he referred to Bill Schbee's earlier comment that there needs to be an approved process, procedure, as defined by Opspec A009, that POI approves to facilitate the continued use of FMC use for navigation when data base is out of currency. He stated the FAA Opspec Working Group can assist

n) Representatives from Cessna outlined how instead of MMEL they control this issue by published AFM limitations. Discussions continued and finally Tim Kane attempted to summarize the points discussed and then stated the current draft 10 to PL represented the best approach and industry position. He proposed that industry agree to move this draft on to FAA for their final decision.

o) Greg Janosik asked why is industry asking for a C category, 10 days. John McCormick stated he had proposed a proviso that aircraft not transit thru a maintenance base but this was rejected. Several operators gave their pro and con positions on a 10 days limit. Greg strongly objected to the C category, 10 days, especially the fact that it is extendable. He asked John to 'cleaned up' the PL draft and submit it. Greg then stressed he intends to see a final ruling be made on this issue before the next meeting.

Action item; John McCormick

- Submit final draft to AFS 240

Item remains OPEN

IG 90 (Ref. pl-98_r1_d10 & pl-98_comment_form, ALPA endorsement)

ACTION - Review status of PL-98, Navigation Databases

LEAD – Greg Janosik- AFS 240 to provide update.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-09. AC 117-1 Crew Rest Facilities

Objective: FAA has requested time for ASI Dale Roberts to speak to the MMEL IG on this issue.

Item Lead: Dale Roberts – FAA (ASI - AFS-200)

Discussion:

It is anticipated FAA will issue a new AC before the IG meeting that will provide onboard crew rest facility details, the basic requirements of which are contained in the flight and duty time final rule issued January 2012 and effective January 2014. One of the keys to making the flight and duty time final rule work is the ability to augment crews allowing longer flight times and flight duty periods, which requires an onboard crew rest facility; MMEL relief for these rest facilities is also a key part of this process.

IG-87: (No attachment available at time Agenda was finalized; one may be provided later)

Dale Roberts (FAA AFS-220) presented some of the regulation's changes and he stated the group needs to concentrate on items of equipment that potentially can be deferred that could be impacted by new rule change. He outlined some elements of the rule and how they may impact the industry. He began with under new Part 117:

Flight crews must report fit for duty. He stated to be considered fully rested a crewmember should get 8 hours of sleep. Less than that will result in a deficit that degrades performance.
The rule classifies rest facilities as class one, Good, class two, Fair, and class three, Poor.

- Class one is defined as a flat sleeping surface that is a separate compartment that has control over temperature, lighting and affords a level of noise reduction.
- Class two means a seat that allows near flat sleeping position and is separated from other seats by a curtain that provides a degree of darkness and noise reduction. Also class two can be two crewmembers sitting adjacent but does not allow either to be a passenger.
- Class three is a seat in cabin and can be situated adjacent to passenger(s). Also class three must be able to recline 40% and provide leg and foot support.

The term 'suitable accommodation' applies to ground rest facilities and not onboard aircraft facilities.

Flight duty periods (FDP) for augmented operations are listed in table format:

- FDP chart lists the limits for augmented operations and by cross referencing the rest facility class 1, 2, 3, number of crewmembers, and time of check in for duty for determining flight duty period in hours.
- Additional requirements detail amount of inflight crew rest each pilot must be afforded based upon criteria such as crew duty, i.e., pilot landing versus pilot monitoring, the number of segments during FDP, at least one crewmember must be qualified under 121.543.(b).(3).(i) and other requirements as listed in table contained in rule, etc.

Fatigue Risk Management Systems (FRMS): an optional approach to fatigue management and requires data collection for analysis to demonstrate satisfactory alternate means of compliance. Example given was a crew rest facility that did not meet the regulation requirement but though data collection and analysis the carrier may be able to demonstrate it will provide the same quality of rest, i.e., a class one facility that does not have a flat surface, etc. Dale stressed that unlike other regulations the FAA will not be issuing exemptions but instead require FRMS analysis to demonstrate equivalent level of compliance.

In answer to an industry member question Dale clarified what was meant by data collection for FRMS analysis. He stated it would require active monitoring of crewmember level of physical alertness using what he called 'active graph data.' He further clarified this as a crewmember would wear a monitoring device and perform physical tests designed to measure reaction time in response to a stimulus, etc.

(Continued)

IG 90 AGENDA DRAFT 00

90-09. AC 117-1 Crew Rest Facilities (Continued)

Another inquiry was in regards to release to Crew Rest facility AC. Dale reported it recently when out for publication. He then was asked what type of equipment items this rule may have impact upon. He presented a document from rule that he referred to as QAS (Qualification Analysis Statement) that listed items that operators will need to consider, e.g., for class two facility, it listed an inoperative curtain, curtain fails to enclose seat surface, that would probably need to accounted for in MMEL or the rest facility would be downgrade to a class 3.

Another question was that it was understood that if electronic means such as the ACARS was used to communicate acceptance for duty restrictions as a part of release then it, ACARS, would need to be addressed in MEL as a requirement for dispatch? Dale indicated yes and that is a regulatory requirement. Additional comments were expressed regarding applicability of Part 117 to all 121 operators, passenger and all cargo. Kevin Peters (FDX) questioned Dale's comment that all cargo operations are conducted under part 121, as he reported he believed FedEx feeder aircraft are not 121.
Dale stated that an operator, who is not currently affected by rule, can choose to opt-in to Part 117 but once in cannot opt out. Dale followed on stating they have not as yet crafted a Part 135 crew fatigue rule.

Doug Mullen (Assistant General Counsel) asked Dale if he envisioned the group coming up with a PL draft. Dale stated he will defer to AEG on that. A member from United Flight Ops asked if workgroup could be assigned to evaluate the requirements of the new rule and come up with MMEL guidance. Dale responded that MMEL relief and provisos will have to be determined by collection of data. He gave example that of a class two facility with a non-functional curtain. He stated through scientific data collection of parameters such as sound reduction with curtain in place versus incomplete, or partially open, etc., they would have determine if the facility still qualified as a class two or if it would have to be downgraded along with FDP limits.

Paul Nordstrom (Boeing) asked how does Boeing aircraft which currently have numerous flight crew rest configurations and MMEL permissible relief get classified. He stated he assumed they all would be considered class one. Dale referred to the classification charts contained in the rule. He stated that would determine application of class. He then stated once an aircraft gets evaluated the operator will get an Opspec A117 denoting such. He stated the opspec will list the aircraft with installed class of rest facility by tail number and serial number and will contain the limitations and chart so the exact FDP limits can be determined. Paul asked if this program has been coordinated with EASA and Air Transport Canada, Dale said, yes. He stated AC will contain a detailed outline and all necessary guidance will eventually be published in 8900.1. Dale concluded with comment that rule implementation date is Jan 4, 2014.

Tom Atzert (UAL) volunteered his assessment of how MMEL relief would possibly need to be structured. He outlined three categories:

- Items that would not downgrade the classification of a crew rest facility
- Items that would necessitate a facility downgrade
- Items that would make facility unusable.

He then stated classification and evaluation of such equipment standards would be arduous affair and asked how was going to head up a workgroup?

Potential workgroup volunteers:
Dale Roberts – FAA (LEAD)
Doug Mullen – A4A (Co-LEAD)
Paul Nordstrom –Boeing
George Roberts – Delta
Tom Atzert – United
Brian Leska – ALPA
Nacho Lavineta – US Air

Note: Doug Mullen proposed A4A will assign appropriate resources. He also suggested A4A scientist be appointed to assist.

(Continued)

IG 90 AGENDA DRAFT 00

90-09. AC 117-1 Crew Rest Facilities (Continued)

IG-88:

Action- Doug Mullen (A4A) provided work group update

- First WG call was on October 11, First WG meeting on November 8 after the MMEL IG meeting.
- The goal of the Nov 8 in-person meeting will be to have preliminary discussions about what the WG believes are appropriate items for relief.
- Doug is drafting an issues paper that will be distributed to the WG members.

Bob Ireland reviewed the workgroup progress.

- On Nov 6 Doug Mullen sent a draft issues paper to the workgroup and
- on Nov 7th Bob Ireland distributed a matrix which compares the Regulation, Advisory Circular and FDP Aerospace Recommended Practice.
- Workgroup will meet Nov 8 after IG 88 has ended to conduct their first meeting.

Item remains OPEN

IG-89:

Action- Bob Ireland (A4A)

- provide work group update
- Workgroup will meet on day 2 after IG90 has adjourned

Workgroup
Dale Roberts – FAA (LEAD)
Doug Mullen – A4A (Co-LEAD)
Paul Nordstrom –Boeing
George Roberts – Delta
Tom Atzert – United
Brian Leska – ALPA
Bob Taylor – US Air

a) Bob Ireland (A4A) stated the workgroup has a draft document out for comment. He outlined that the crew rest facilities rule breaks out crew rest in three categories and he said their group has only addressed the equipment issues listed in the associated AC 117-1. He gave an example of how this AC incorrectly refers to an obsolete SAE specification and he reports that needs to be addressed. He outlined how the SAE addresses only one level of crew rest and not the other two that is contained in the AC. He stated A4A plans to contact SAE and address a fix to their specification. He outlined some of issues such as lay flat seating dimensions as an area needing addressing.

b) Gene Hartman (FAA LGB AEG) asked if this AC 117-1 will replace an AC 121-31 that AEGs currently are using to evaluate adequacy of crew rest facilities on Part 121 aircraft. Bob stated he personally was unaware of this particular AC and he was unaware of anything in the 117 document that states it will be superseding other documents. It was asked when the crew rest regulation was to go final. Bob stated it will be effective Jan, 2014.

Item remains OPEN.

(Continued)

90-09. AC 117-1 Crew Rest Facilities (Continued)

IG-90:

ACTION - provide work group update
Update - Draft PL provided for review

LEAD: Bob Ireland (A4A)

Workgroup
Dale Roberts – FAA (LEAD)
Doug Mullen – A4A (Co-LEAD)
Paul Nordstrom –Boeing
George Roberts – Delta
Tom Atzert – United
Brian Leska – ALPA
Bob Taylor – US Air

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-10: Deferral of MMEL Item Subcomponents which are not specifically identified in the MMEL

Objective: To discuss whether certain subcomponents of primary MMEL Items, the subcomponent not being specifically identified as a subcomponent in the MMEL, can be deferred as NEF (e.g. passenger seat position light, foot rest, tray table…).

Item Lead: Boeing – Paul Nordstrom

Discussion: Boeing received an inquiry from an FAA Inspector regarding a light installed on some seats that indicates when the seat is in the full upright and locked position. The light is a subcomponent of the seat, which is listed in the MMEL; however the MMEL does not authorize separate relief for the light. Operators have been using NEF for the light; the Inspector is trying to understand how the light can be NEF when 8900.1 V4 C4 S11 states "If the inoperative, damaged, or missing item is listed in the MMEL, CDL, or operators MEL, then the deferral procedures for that item must be followed. If the item is a subcomponent of a primary system identified in the MMEL/MEL/CDL, where no previous relief was authorized, the subcomponent may not be deferred in accordance with the NEF procedures outlined in Chapter 25 of the MMEL or MEL."

IG-87: (No attachment)

Paul Nordstrom (Boeing) stated he was contacted by a local FAA individual who was seeking guidance on proper use of NEF as in reference to the issue of a component of a MMEL system where the component is not listed in MMEL but was being placed on a local operator's NEF program (see Discussion paragraph above). Apparently per the NEF Policy (Ref: 8900.1, Vol4/Ch4, section 11, flowchart element 2.0) this is possibly not allowed. Paul stated Boeing felt the sentence attached to step 2.0 is vague in meaning and could stand clarification.

He expressed concern that if this is true then all associated items of the MMEL included system would have to be considered as having a safety, airworthy consideration. He stated that they did not believe that to be true in all cases. In addition to the light in question he gave example of a seat tray table that currently is considered as NEF item and typically can be found on an operator's NEF approved list. He then deferred to Kevin Peters (FDX) to comment on use of the NEF flowchart. Unfortunately, Kevin stated he was not overly familiar with application of the NEF flowchart and could only give his initial impression of his own reading of sentence attached to element 2.0.

Kevin stated that as worded the 2.0 element could be considered somewhat synonymous with MMEL master definition #19, Inoperative Component of an Inoperative System. Todd Schooler stated he too could see that the intent was not to allow components of MMEL system going on the NEF list.
General discussion pursued and eventually Paul concluded that if that is the case then there would be no justification for an operator having an NEF list? Mike Evanoff stated we need to go back to how these components were addressed prior to NEF, under Pax Convenience items program and he proposed a possible workgroup to study issue. Discussion was held on whether a

lighted indicator is a part of overall seat functionality versus that of a tray. Another IG member mentioned that certain items such as tray table have already been considered acceptable as NEF by virtue that it is found in NEF master list.
Paul concluded with suggestion that NEF PL 116 wording be adjusted.

Workgroup volunteers:
Paul Nordstrom – Boeing (LEAD)
Mike Evanoff – Virgin America
Mike Baier – AAL

(Continued)

90-10 Deferral of MMEL Item Subcomponents which are not specifically identified in the MMEL (Continued)

IG-88:

Paul Nordstrom (Boeing) opened the discussion by outlining an optional piece of equipment for passenger seats, a light that illuminates when the seat is not been brought up to the full upright position. He continued with a scenario where an operator wanted to place this indicator on NEF deferral but discovered a potential conflict to doing so when they reviewed NEF guidance in 8900.1, Vol 4 /Ch 4, Section 11 that states: *

> "If the item is a subcomponent of a primary system identified in the MMEL/MEL/CDL, where no previous relief was authorized, the subcomponent may not be deferred in accordance with the NEF procedures outlined in Chapter 25 of the MMEL or MEL."

* This information is found in the NEF flowchart, figure 4-52, step 2.0.

Paul reminded the group of earlier discussion had on EFBs (agenda item 88-13) where it was proposed that ancillary functions such as a print button could be considered NEF as another example of conflict with this guidance. He stated that the workgroup had developed a proposed change. He said they suggest deleting the current statement or replacing with alternate one that states:

> "If the item is a subcomponent of a primary system identified in the MMEL/MEL/CDL and the sub-component is functionally required to meet the certification or operational compliance of the primary system then the subcomponent may not be deferred as NEF."

Group discussion pursued on whether or not it can be adequately determined at the time an operator seeks to add an item to NEF that they can readily determine if a subcomponent is required for certification. It was mentioned that was a responsibility of OEM to do. Todd Schooler stated much of these types of equipment are not OEM but BFE, vendor equipment and he gave example of a very minor component that he state nobody would consider cert required but indeed it is, i.e., the devil is in the details.

A member of the group expressed concern that the proposed change will lead to re-evaluation the approval of every carrier's NEF program. Changing the definition was cautioned as possibly having 'unintended' consequences, negatively impacting a currently workable NEF process.

Lengthy discussion on how numerous items such as seat tray tables that are on NEF universal list could be considered as not NEF acceptable per the current guidance.

Lengthy discussion pursued on origin of NEF and the existence of the universal NEF list along with discussion pro and con on whether to pursue a PL amendment or an 8900.1 revision was raised without a resolution. Greg Janosik cautioned that NEF has become a 'very sore' subject within FAA HDQ and he stated if the group wants to start challenging, tweaking, the required items of the program such as taking an MMEL item apart, determining at the operator level what is required and what not is an invite to trouble, harm to the program. Discussion continued for a long time until Tim Kane finally summarized the group's discussion and suggested that the workgroup be re-convened to consider the issues raised.

Item remains OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

90-10 Deferral of MMEL Item Subcomponents which are not specifically identified in the MMEL (Continued)

IG-89:

Proposal Tabled – Pending Industry Discussion.

Tim Kane (Industry Chair /JetBlue) stated the workgroup has recommended closing this agenda item. He stated it impacts the NEF PL which he states has an incorrect statement in it. He stated while he feels the NEF PL should be opened to correct the step in question (Ref: previous MMEL IG 88 minutes) but group was cautioned to leave PL 116 alone. He finished with comment that he plans to have workgroup have one more teleconference on subject but he expects subject to put to rest.

Action item: Tim Kane

Item remains OPEN

IG-90:

ACTION: Revise PL-116 and associated section of 8900

LEAD: Boeing – Paul Nordstrom

Update- Tim Kane (Industry Chair /JetBlue) held a workgroup conference call. The workgroup reviewed the implications of the NEF PL which has an incorrect statement in it.

The workgroup agreed the NEF PL 116 and associated section of 8900 should be opened to correct the step in question. Request for FAA HQ participation in the revision proposal.

Item remains OPEN

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-11. PL-63 Equipment Required for Emergency Procedures

Objective: To ensure the foundation of PL 63 R4 is as strong as the original PL.

Item Lead: Eric Lesage (Airbus)

Discussion:

IG 86: (Ref. PL 63 R4 D3 Airbus Comments, and PL 63 R4 D4 Airbus)

Eric Lesage (Airbus) presented their new two-fold proposal. First is to introduce complementary guidance associated with the original guidance of 63_R3 which is to ensure relief is not granted to instruments and equipment item required to accomplish an emergency procedure. He stated they felt this is too restrictive and they want to add the term 'necessary' to accomplish an emergency procedure. Apparently Airbus feels without this added guidance the current 63_R3 implies that any system utilized by emergency procedures is considered as NO GO even if it can be shown that the non-availability of
a system does not impair the accomplishment of an emergency procedure.

The second proposal is to remove of all references to equipment items that are powered by electrical emergency bus bars from the second part, paragraph of current 63_R3. He stated that Airbus feels this is too restrictive and a cause of confusion as it does not account for system design redundancy, results in unnecessary restrictions, differences of relief in master MELs granted by FAA and EASA.

Eric stated he wanted to give explanation of how Airbus takes PL 63 in account when evaluating items of equipment for MMEL relief. He stated they understand that a special assessment must be done regarding equipment called out as required in an emergency procedure. He stressed that this assessment must be done regardless of the probability of failure of equipment in question, and that if the equipment is used in different procedures then it must be done for each procedure. He then stated that just because an item is called out in a procedure it does not implicitly mean that unavailability of item impairs the correct accomplishment of a procedure. He gave examples of how redundant system / equipment that can be used to achieve the desired response.

Regarding Airbus' second proposal of removing reference to emergency bus bar powered equipment, he stated as a manufacturer Airbus has to demonstrate that when the aircraft is in an emergency configuration that it is compliant with certification requirements and can remain in a 'safe' condition, but he stressed that a manufacturer can decide to design aircraft to go beyond these minimum specifications for sake of providing additional reliability functions to the crew. He gave example of later generation aircraft having greater power output of generators allowing redundant equipment being powered by separate emergency power sources.

He thus proposed removing verbiage '..if powered by an emergency bus or equivalent..' from PL 63's second paragraph. He also proposed that the topic of whether or not items of equipment need to be emergency powered should be topic of another policy letter, Airbus proposes the focus of PL 63 be only the accomplishment of any emergency procedure. He then presented a new version of PL 63 which had the title changed to "Instrument and Equipment Items utilized for Emergency Procedures" with refined scope statement.

He explained Airbus' reasons for substituting wording such as 'unitized' and 'necessary' in place of 'required.' He stated 'required' is too often interpreted as if it is listed in procedure then it is a NO-GO item. Whereas the use of the other two terms allows for more substantial evaluation. He gave examples of lighting configurations where multiple lights are on an emergency bus power source and hence under today's PL are not allowed to be inoperative whereas in an actual emergency only a very limited number are actually necessary for safe accomplishment of the procedure. Todd Schooler (Cessna) agreed stating

as a manufacturer they too place much more equipment on emergency busses than is required for emergency procedures.

(Continued)

IG 90 AGENDA DRAFT 00

90-11. PL-63 Equipment Required for Emergency Procedures (Continued)

Eric gave other examples related to speed brakes, autopilots, and a specific one regarding failure of the automatic presentation of passenger masks stating that as per their draft PL language that on a case-by-case basis if a manufacturer can demonstrate by quantitative analysis that absence of the equipment item does not impair safe operation of the aircraft, then the item should be a candidate for MMEL relief. Group discussion ensued with varied opinions expressed from several people arguing that 'required' is a better term than 'utilized'; other wording and re-organization of the proposal were also suggested. Dennis Landry (ALPA) commented that this new approach by Airbus is totally different from their original proposal (see minutes of previous IG meetings). Eric agreed that this is a change of direction as Airbus is now of the opinion that the description of equipment power sources is not what we should be concerned with. Bob Taylor suggested Eric provide a revised updated draft of PL proposal for posting for comment.

IG Chairman's Note - Post-IG 86 Airbus reconsidered the format originally presented to the group as PL 63 R4 D4, is withdrawing R4 D4, and will resubmit a new draft proposal as part of the IG 87 agenda.

Action Item: Eric Lesage - Provide updated Airbus draft proposal of PL 63.

IG 87: (No attachment - Airbus will await publication of PL 63 R4 D3 before determining if there is a need to submit a proposal.)

Eric Lesage (Airbus) presented a draft R5 to R4 that is an attempt to clarify that MMEL relief is permissible if it can be shown accomplishment of emergency procedures is not impaired by the non-availability of certain instruments or equipment items being powered by an emergency bus.

His draft extended scope of PL and at same removed the original PL examples of emergency bus powered items of equipment as he stated they represented older technology and also lead to PL being overly lengthy and confusing. Eric outlined the changes he has inserted in this latest draft.

Workgroup volunteers
Dennis Landry – ALPA (LEAD)
Eric Lesage – Airbus (Co-Lead)
Brian Lesko – ALPA
Todd Schooler – Cessna
Garry Larsen – FAA AEG

IG 88:

Note: items 87-16 and 87-16a are closed. Item 87-16b renumbered to 88-15.

Action- Eric Lesage provided workgroup update

- Item is still under workgroup review and not ready for discussion at IG 88.
- Item remains open for next meeting.

Item remains OPEN

Eric Lesage (Airbus) stated issue is still under discussion and not ready for group presentation. Tim Kane asked for a mid-term update before next MMEL IG of a second draft proposal.

Item remains OPEN.

(Continued)

90-11. PL-63 Equipment Required for Emergency Procedures (Continued)

IG 89:

Note: Item 88-15 renumbered to 88-12.

Action- Eric Lesage provide workgroup update

- Workgroup met at IG 88.
- Item remains open.

a) Eric Lesage (Airbus) spoke to the third draft of PL and outlined the workgroup activity as listed in draft that states items involved in emergency procedure can be allowed to be deferred provided their non-availability does not impair accomplishment of emergency procedures. He also outlined how the draft also addresses items powered by an aircraft emergency bus. The PL discussion block has been expanded upon how these two conditions can be accomplished. Examples are included to demonstrate how to apply each.

b) Next he outlined how all the previous examples referring to DC-9 and 727 aircraft have been deleted. Finally the Policy statements were presented that listed that these two specified conditions are the responsibility of the FOEB Chairman to ensure do not adversely impact the continued safety of flight. Gene Hartman (FAA LGB AEG) stated that he felt lumping this on the back of the AEG was not something that the AEG Chair can fully evaluate, as it involves whether or not certification rules and processes has not be impacted.

c) Another group member questioned the evaluation taking into account 'remaining duration of flight' as listed in second condition, items powered by emergency bus.' He stated MMEL relief is based upon discovery of item inoperable before commencement of flight, not during flight. Eric responded that they were considering the various levels of redundancy between different aircraft and generations of aircraft design; that some failures once having occurred must be taken in account for duration of flight as redundancy may not exist to overcome it.

d) Gene Hartman responded that evaluating conditions that exist that lead to emergency are very difficult to predict and he asked was Eric proposing that AEGs engage in risk analysis to determine such conditions. John Hientz (Transport Canada) stated to do this assessment AEG will need to engage the services of the certification branch more than is customary done in regards to FOEBs. He too stated that he thought the wording regarding remaining duration of flight needs to be struck.

e) Tim Kane (Industry Chair / JetBlue) stated he thought the PL should go back to the workgroup for another review, revision that takes into account the concerns raised during the discussion. He suggested changes to the workgroup.as some previous members would be unavailable, Gary Larsen (FAA, AEG, SEA) and Brian Lesko (ALPA). United volunteered a member.

Item remains OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

90-11. PL-63 Equipment Required for Emergency Procedures (Continued)

IG 90:

ACTION - Provide update on PL-63 revision proposal

LEAD: Dennis Landry – ALPA (LEAD), Eric Lesage – Airbus (Co-Lead)

Workgroup volunteers

Todd Schooler – Cessna
Brian Lesko – ALPA
Garry Larsen – FAA AEG

IG 90 AGENDA DRAFT 00

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-12: PL 73 MMEL Relief for Emergency Medical Equipment

Objective: To keep PL 73 on the agenda to monitor any potential changes to current PL 73 R5, currently being discussed within FAA Legal.

Item Lead: Bob Ireland/Joe White (A4A)

IG-90:

Discussion: Tim Kane.

Circumstances have evolved regarding components of the EEMK which merit attention. Shortages of two required components of the EEMK have developed;

Atropine and Dextrose

A4A have petitioned for exemptions to CFR 121 Appendix A.

A4A - update?

Recommend maintaining agenda item for updates.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-13: PL-40 ETOPS

Objective: Propose a slight amendment on the PL 40 (ETOPS and Polar operations)

Item Lead: Eric Lesage - Airbus

Discussion: (Attach PL-40 r03 d01 v1)

This change concern the Fuel systems. It is proposed in consistency with the new ETOPS design criteria published in 2007.

The principle of our proposal is that the Chapter III indicates that there are two means to enable ETOPS > 120 min dispatch with a main tank pump inoperative in a main tank, while ensuring that the fuel stored in this (these) tank(s) remains available to the engine at the NCF, which is typically failure of a second pump in the affected main tank(s):

1- Demonstrate engine operation in suction (gravity) feed in all flight conditions (as proposed by current PL 40) if there is no remaining fuel pump capable to pressurize this fuel to the engine(s), or
2- Ensure that a third pump remains available to pressurize this fuel to the engine(s). This third pump can be located in the affected main tank(s) or in an adjacent tank provided that this tank can receive the fuel located in the main tank by gravity transfer and can directly feed the engine.

Such change may be beneficial for various airplane manufacturers/models. As far as Airbus aircraft are concerned, it would concern the A330 models (fitted with three pumps in each inner tanks) and the A350 models (Two pumps per wing tank + Gravity transfer between wing and center tank (in case of failure of both wing pumps) + Center tank pump directly feeding the engine(s))

Eric Lesage (Airbus) presented his PowerPoint proposed change to PL 40 that included new guidance regarding ETOPS and Polar Ops dispatch with main fuel boost pumps inoperative(s). He began with outline of an apparent new ETOPS design requirement that states "..fuel necessary to complete the ETOPS flight must be available to operating engines at pressures and fuel flow as by required by FAR 25.955 under any airplane failure condition not shown to be extremely improbable."

He then when to describe how the current PL-40 provides for only one of two design criteria, that MMEL relief may be granted on the "..ability for engines to satisfactorily operate on suction feed in all flight conditions…" He stated this design requirement is the only one considered in current PL-40. Airbus' proposal is to introduce into PL-40 a second means by which ETOPS beyond 120 minutes may be granted. He presented this as follows:

> No MMEL relief is allowed for the Main Tank Fuel Pumps for ETOPS beyond 120 minutes. This requirement may be reexamined based on:
> (1) Ability for the fuel system to feed the engines with the fuel located in each main tank from at least three Fuel Pumps, or
> (2) Ability for engines to satisfactorily operate on suction feed in all flight conditions (ambient temperatures, turbulence, etc.) for extended periods of time.

He defended this by stating depending upon the fuel system design positive pressure and fuel flow can be provided by at least three fuels pumps. He described this as either having a third pump in a main tank or having only two, one main and one standby along with a third pump being located in an adjacent tank provided this third pump has been demonstrated to provide the necessary pressure and flow via gravity feed to the operating engine during the ETOPS maximum-length diversion in all flight conditions. He then presented the Airbus PL-40 draft where this second exemption for obtaining ETOPS dispatch beyond 120 minutes based upon this alternate means compliance given by FAA ETOPS design rules.

(Continued)

He outlined how this Airbus proposal is in support of the A330 via the first means of exemption, having three pumps in a tank, and A350 by the other, two pumps per tank supported by gravity feed from another. He outlined the tank, pump configurations of both aircraft. In response to group questions Eric described normal and abnormal conditions and how as a final fourth method of protection is gravity feed. Paul Nordstrom (Boeing) this is a virtually impossible condition to demonstrate adequately. Another member stated he seriously doubted that FAA would grant Airbus this second exemption method. Greg Janosik (AFS 240) asked if Airbus has demonstrated this alternate means. Eric stated has there are plans in play to do so. Greg stated until it demonstrated FAA will not grant this. The counter was that they want to PL to authorize this as something that they can attempt to do as he stated they could expand the efforts and prove this but then be told the PL does not authorize this a an alternate means. PL-40 draft to be submitted as presented.

Item remains OPEN.

IG 89

Item Lead: Eric Lesage - Airbus

Provide update

a) Eric (Airbus) stated he thought PL was ready to be posted for comment but apparently not so. Greg Janosik (AFS 240) asked if this was an attempt to address the main tank pumps issue previously outlined (Ref: previous MMEL IG 88 minutes) that some aircraft have a third main tank pump installed and Eric responded with an affirmative.

b) He then outlined the changes Airbus is recommending. Greg asked for further clarification of why this requires a PL update. He asked how many aircraft Airbus has in this alternate pump configuration. Eric states only two, the 330 and 350. Greg stated he felt PLs needs to be more broad based, affording relief for majority of aircraft and operators and not just one, limited application.

c) Eric outlined how current PL wording is been used by the AEG to deny consideration via FOEB process. Greg requested that the AEG communicate to him what within the current of the wording of PL needs to be changed before they can evaluate Airbus proposed relief. Eric outlined how the current PL-40 states how no MMEL relief can be given to a main tank fuel pump. Greg countered that the condition can be re-evaluated but it must come to him as a request of the AEG. Eric stated that Airbus experience has been that AEG Chairman has instructed them that the PL is something that AEG cannot deviate from what it states, thus Airbus needs to take up the issue of revision to PL-40 via the MMEL IG first.

d) Eric outlined the Airbus proposal again but to no avail, Greg insisted the request needs to come from AEG as they are the FAA technical experts. Eric stated with a degree of frustration that when presenting their design to AEG it is rejected as not fitting exactly into the design description of the PL. He reported as a consequence for the past 15 years Airbus aircraft have been held to more conservative restrictions in the US than it is in the Europe because of PL-40 and AEGs unwillingness to consider their design.

e) Greg explained that the purpose of majority of Policy Letters is to standardize the relief and if a situation exists where the condition been addressed covers only one or two aircraft and both are managed by the same AEG branch then he would expect standardization to be occurring at that AEG level. John Pinnow (FAA AEG SEA) spoke up that he recalled a similar situation been discussed at their AEG some months prior where they agreed in principal but it was also agreed
that they needed further justification. Eric countered that this was in fact when the AEG expressed they felt that is was contrary to current PL-40.

f) Bob Davis (AFS 240) spoke to issue that crafting of MMEL relief is a collaborative effort between different groups within FAA. AEGs and the FOEB Chairman have their area of expertise while some aspects of MMEL such as ETOP rules are governed by the certification branch while standardization falls on the shoulders of AFS 240.

(Continued)

IG 90 AGENDA DRAFT 00

90-13: PL-40 ETOPS (Continued)

g) Thus he implied this inter-relationship between the branches may well be a factor here as to why AEG feels the acceptability of Airbus proposal lays beyond their area of expertise?

h) Tim Kane (Industry Chair / Jet Blue) stated he had Eric's PL draft and he asked for Greg to comment. Greg stated if Eric can get AEG to buy into PL then he, Greg, will see that Airbus' draft get posted.

Item remains OPEN?

IG-90

ACTION: Provide status update on PL-40 revision proposal

LEAD: Eric Lesage - Airbus

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-14: PL-79 Passenger Seat Relief

Objective: Discuss PL 79

Item Lead: Todd Schooler - Cessna

Discussion:

IG-87: (Ref. pl-79 r9d0)

Todd Schooler (Cessna) presented an overview of new style seating Cessna business Jets have installed outlining the advances in seat features. He then presented his revised draft to PL 79 with additional item descriptions and new sub-items for seat controls. Thus he reported this a consolidated PL; addressing operating Parts, 91 thru 12, combined with seat functions found on newer business type aircraft certified under Part 23 and 25, as more of these new features are being incorporated into newly designed interiors of virtually all categories of passenger aircraft. PL also included new sub-item for side facing seats. He asked the group for comment.

Little to no comments with exception of format issues such as should one of the provisos be a NOTE instead of proviso as was customary in previous versions of PL (a seat with inop seat belt must be considered inoperative). Use of the term “placarded” as listed in the provisos that required seats to be secured for taxi, takeoff, and landing was discussed along with the issue of positioning of such placard(s) was discussed. Finally Paul Nordstrom (Boeing) questioned the listing of components such as recline, armrest, headrest inside the parenthetical description of components listed under new title of seat controls. Paul stated that he thought these items were being handled at the operator level as NEF.

Todd responded by stating headrest cannot be considered NEF as it is designed into the seat to meet the crashworthiness standard. Paul also questioned setting the seat relief standard on the features, relief afforded business jet design rather than the standards found on large transport category aircraft. Todd countered that the all charter airlines like NetJets carry nearly as many passengers. Gary Larsen, (FAA SEA AEG) expressed concern over the inclusion of required items along with non-required items within the parenthetical header of new sub-item, Seat Controls. In regards whether PL should be imposing the need to apply a placard when item is inoperative, John McCormick (FDX) stated that is not the standard. He stated item(s) that must always be operative are permanently placarded as must be installed for taxi, takeoff, and landing. Todd agreed to make a few minor changes and then forward to FAA for comment posting.

Item remains OPEN.

IG 88

Action – Todd Schooler (Cessna) to provide update.

Todd state he had forwarded his update but it did not find its way in the agenda attachment. Todd attempted to outline the changes he had made. He stated the currently approved PL breakout the

various seat functions like the armrest, recline function, etc., with their own proviso conditions. He stated the workgroup decided to instead of listing all these separately lump them all together under title of Seat Controls. He stated they did this because all use virtually identical proviso conditions.

He outlined a few exceptions that should not be so lumped into this category as they may have particular certification requirement to be considered. He cited Headrest as an example. Paul Nordstrom (Boeing) had a minor objection to some the components listed in the new category as he reported they are currently handled as NEF items. He stated this proposal would move them to MMEL status. Plus he stated if something is not specifically listed could become non deferrable. It was proposed that the parenthetical bracket examples be removed. The suggestion was to just call it Seat Control Systems.

(Continued)

90-14: PL-79Passenger Seat Relief (Continued)

Discussion pursued on pro and con of having such a grouping or a separate listing. Paul commented again that was listing removes the option of NEF of such components. Another issue of having seat function break out on the PL is that it gets published in MMEL verbatim but the diversity of the seat designs leads not all having the same level of components. Paul stated they should via the FOEB process have the MMEL tailored to the equipment. Todd and Dave Burk (Aerodox) responded that many AEG chairman demand that PL standard be used instead. Dave stated what goes into the MMEL is exactly what the local FAA demands go into MEL. Paul countered that if the equipment is not installed on the aircraft then MMEL relief can be omitted from MEL.

Finally, it was decided to remove the parenthetical information and have the draft PL be posted to FAA comment grid for review.

Item remains OPEN.

IG 89

Action – Todd Schooler (Cessna) to provide update.

a) Todd Schooler (Cessna) stated that at last IG he was asked to update the PL discussion block to address new seat technology features of passenger seats on private aircraft and address concerns with CFR 25.815. His proposed wording was reviewed.

b) Greg Janosik asked if this was intended to cover Part 23 certificated aircraft? Todd stated yes and Greg then informed him that his PL purpose statement failed to list this.

c) General discussion was held on other elements of draft and Tim Kane suggested the workgroup take one more attempt to cleaning up draft. Once workgroup is finished it will be posted for comment.

Item remains OPEN.

IG90

ACTION: – Provide update on workgroup progress of PL-79 proposal

LEAD: Todd Schooler

Item remains OPEN.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-15: PL-106 HF Radio Communications MMEL Requirements

Objective: To remove the Note from the current PL 106 R4..

Item Lead: Scott Hofstra, UPS

Discussion: UPS contends that the note at the bottom of the proviso is no longer valid and needs to be removed.

IG 86: (Ref. PL 106 R5 D1, 121.351, FAA SATCOM Press Release)

Scott Hofstra (UPS) had a new draft PL 106 presented on overhead and directed the groups attention to the Note that states SATCOM Voice is to be used only as a backup to normal HF communications. He stated this Note is wrong and needs to be deleted as they now use SATCOM as primary voice comm all over the world. To make his case Scott referred to FAR 121.351 — Communication and navigation equipment for extended over-water operations and for certain other operations. He stated this regulation was changed in 2007 from HF required to only two independent long-range communication systems required. He also stated FAR 91.511 was similarly changed and that FAA had issued a press release approximately a year ago that talks to SATCOM being approved for use in voice communications. He reiterated that the Note is wrong and is causing much confusion in UPS' pilot force.

He then reported that they have been in communication with a certain FAA inspector in Washington who apparently has control over this PL. He has thus far refused to allow the deletion or revision of this Note. On being asked what is his basis for doing so the inspector reported that HF is required per an ICAO rule. When they asked for copy of this ICAO rule and the inspector backed away from that and then reported it is in accordance with 91-511. Scott stated that they disagree because as he already reported this rule was changed in 2007. Scott concluded that the Note is therefore wrong and needs to be deleted. There was a general sense of agreement expressed by the group followed by some discussion on the cost of use by different SATCOM Service providers.

Greg Janosik stated he would not take a stance on this issue until he is able to talk to certain individuals at HDQ; his intent is to have a subject matter expert (SME) from HDQ attend the IG meeting.

Action item: **Greg Janosik –** Review proposed changes with HDQ, and arrange for SME to address the IG.

IG 87: (Ref. pl-106_r5_d1, and CFR 121.351)

Dave Edgar (UPS) stated they feel the NOTE at bottom of PL proviso list that states "SATCOM Voice is to be used only as backup to normal HF comm" be deleted as they felt it is redundant. Greg Janosik (AFS 240) stated that FAA is not inclined to remove NOTE until an ICAO regulatory issue regarding SATCOM is resolved. ICAO is planning to meet this September and only then will this be removed. He reported that the draft PL is currently being worked to update it to more modern nomenclature and once all parties have met and agreed then he sees no problem with removal of this note.

Thierry Vandertroppe (EASA) spoke regarding status of this PL as they (EASA) have been working on guidance pertaining to HF and a proviso regarding deferral of HF powered by an essential bus. He stated this needed to be preserved for emergency procedure when operating on a long range route. He stated he did not see this beeing taken into account with this PL. He asked if there is any rational for that as they, EASA, have been attempting to harmonize with FAA rules. Questions were raised as to what rule was being spoken to, ICAO, EASA or FAA requirement? John McCormick asked are we writing FAA MMEL to meet US regulatory rules or to fit all Nation State CAAs, ICAO, EASA rules, etc. He stated traditionally we have been only addressing US rules.

(Continued)

IG 90 AGENDA DRAFT 00

90-15: PL-106 HF Radio Communications MMEL Requirements (Continued)

He cited the issue of ELT relief. Years ago when foreign nation states such as Russia began mandating that all transport category aircraft operating into their airspace be equipped with ELTs the ATA industry came to FAA via the MMEL IG PL process requesting MMEL relief. FAA initially kicked back stating since there was no US rule for ELT at that time they did not want to grant MMEL relief. John asked if that had now changed? Greg stated that since US operators are now recognized as operating all over the world FAA needs to ensure that relief extended is applicable to this expanding environment. Greg qualified this comment by stating it was his personal understanding and that he is not the FAA subject matter expert thus the request to remove the PL note or address 'other 'rules is the SMA responsibility, which he identified as AFS 410.

Action Item: FAA

Item remains OPEN.

IG 88

Action - Greg Janosik Provide update from FAA

Greg stated he has received an e-mail from the FAA lead on this subject reporting that the point of contention of industry on this PL, the Note that states SATCOM Voice is only a backup to normal HF comm, will be removed. He stated a few other minor changes which he referred to 'rounding off some rough edges' have been made. He states he see that it is posted to FAA comment grid as soon as possible. Dave Stewart (Air Transport Business Development) stated there is a corresponding Opspec that addresses the same subject that needs to be corrected too. Greg stated if the information is embodied into an Opspec then the PL may be archived and as there is no need for two documents addressing the same topic.

Item remains OPEN.

89-17: PL-106 HF Radio Communications MMEL Requirements (Continued)

IG 89 (Attach PL 106 R5 D1)

Document Title:	**PL-106 R5 D1 (HF)**
Summary:	Revision five, draft one
Document for Download:	Draft Document (MS Word) Draft Document Comment Grid (MS Word)
Comments Due:	01/18/2013

Action

- Comments for PL 106 are posted – responses required.
- Issues raised concerning ICAO 2012 content being added to PL

a) Dennis Mills (AFS 240) presented FAA position on PL-106_R5_D1. He introduced himself as a pilot and dispatch specialist for FAA HDQ and being involved in Datalink and communications projects. He stated his prime objectives was to get Satellite Voice (SATVOICE) operational and to justify his draft of PL-106, imposition of flight planning codes be placed in MMELs / MELs.

b) His presentation started with LRCS description. He stated for LRCS, HF is a mature system but as yet SATVOICE is not.

(Continued)

IG 90 AGENDA DRAFT 00

90-15: PL-106 HF Radio Communications MMEL Requirements (Continued)

c) He then presented FAR 91.703 which states operators of US registered aircraft being operated outside the US airspace must comply with Annex 2 of ICAO rules and with 91.117(c) and 91.130 and 91.131 that speak to comm and nav equipment standards while operating in different classes of airspace.

d) He outlined the fact that most foreign countries don't have an FAA and just choice to comply with current ICAO regulations related to flight and maneuver in force. Thus US carriers who fly overseas have to also comply with current ICAO regulation. He concluded that therefore while US operators feel FAA MMEL relief of one HF with SATVOICE as adequate it does not assure legality when operating in all international regions.

e) Dennis stated that this change was driven by ICAO having concerns over this one (HF) plus one (SATVOICE) event and so ICAO has developed guidance material on subject of SATVOICE, a document labeled as SVGM.. He said this, plus new concepts of airspace separation standards going into effect both overseas and on sovereign soil are impacting the issue too. He stated the MMEL provides the basis for MEL development, and that technology is moving very quickly and the MMELs lag behind, and lack proper guidance of what is expected of the operator for compliance.

f) He thus attempted to revise PL to provide the necessary guidance outlining the conditions for of when SATVOICE can be used and stated national airspace providers depend strictly upon flight plan coding to tell them that aircraft are properly equipped to enter their airspace. He stated the FAA position is to support the one (HF) plus one (SATVOICE) approach. Yet some AIPs still require two HFs. The US AIP stipulates SATVOICE, Datalink, is not suitable for non-routine and emergency use and therefore not appropriate as a basis for MMEL relief of HF communication systems.

g) The discussion moved on to the work of the Performance Aviation Rulemaking Committee (PARC), a communication working group who had been working on advancing SATVOICE service and he then stated FAA is looking at the entire scope of CNS and tying to provide updated guidance to operators, primarily geared around performance based navigation standards.

h) Dennis presented a sample ICAO Flight Plan for SATVOICE. The changes in new PL draft was reviewed; the removal of previous Note stating SATCOM can only be used as backup, introduction into MMEL of ICAO Flight Plans filing codes and finally a new note stating direct dial SATVOICE systems will not be considered for MMEL relief. As for the inclusion on ICAO code into provisos he stated that these flight plan codes tell the controller that the aircraft equipment capability is and this gets transferred on to receiving ATCs thus ensuring aircraft can be accepted. Plus these codes cross reference to phone numbers ensuring ATC can contact aircraft.

i) He then discussed the changes to PL Discussion block that refers to ICAO and to SATVOICE Guidance Material (SVGM), stressing it is guidance only material and it not Annex 2. Yet he stated Annex 2 speaks to the need for regional supplements and guidance material Thus reference to the SVGM gives the PL credence as the SVGM document is now universally recognized.

j) Dennis Landry (ALPA) asked were can line pilots look for guidance on new one-plus-one airspace requirements. He gave examples on difficulties pilots run into along with issue that as aircraft transitions from one FIR to the next requirements change. Dennis Mills stated the requirement is first listed in each country, region AIP. He suggested if pilots have difficulties they should 'call' the respective regional ARTCC.

k) John McCormick (FDX) commented that unlike most PLs and MMELs the draft PL contains language that is not normal for PLs, not using standard terminology found in MMEL and for provisos, etc. He stated that it was understood that under ICAO Annex 6 nation states accept the aircraft and flight crew certifications, maintenance programs, including MMEL of the state of registry of the aircraft. Thus if FAA accepts the one plus one then that is all the PL needs to address and other states should accept. Dennis disagreed stating nation states can set their own level of required equipment.

(Continued)

90-15: PL-106 HF Radio Communications MMEL Requirements (Continued)

l) Dennis Mills outlined how the rules, ICAO, ones own country, and those of another can differ. Each has the option to accept ICAO or their use their own. He stated therefore, US operators follow FAA rules but must comply with ICAO upon leaving the US. To ensure compliance the consensus approach should be followed, the most restrictive of differing regulations.

m) He defended his draft change to PL stating that his branch felt that PL needed more specific guidance in light of what called differences in procedural practices observed, etc. He cited confusion over the implementation of ICAO 2012 Flight Planning Initiative. He then stated that he understood John's concern of deviating from standard MMEL terminology as will gladly re-align the draft. His draft wording was reviewed and compared with standardized MMEL phraseology.

n) Tim Kane (JetBlue) stated the confusion over ICAO flight planning initiative arose because the first word of it came from an FAA PowerPoint presentation given to dispatch inspectors that introduced a lot of changes including the need to place equipment coding within the MEL. This coincided with release of InFO 12018 in Nov, 2012. Tim asked that if placement of ICAO code is needed in this one system PL then he expects placement of ICAO coding into many other systems PLs will be demanded.

o) Dennis Landry (ALPA) made the observation that all this is was a consequence of maturation of overseas nation states Civil Aviation authorities, and that those authorities no longer are following the US standards, etc. He stated it now incumbent on each operator to inspect their operations for conflict with these ICAO and other foreign nation state regulations.

p) Paul Nordstrom (Boeing) stated while he agreed in general he felt this was not the proper use of MEL. An MEL is a vehicle to authorize something not being operative and aircraft safely dispatched. He countered that the draft PL's provisos d) and e) are not required. He stated they were not needed as dispatchers must have already assigned the codes in filing the flight plan in order to allow use of SATCOM and this is coordinated before aircraft is released, and not action to be done as a consequence of discovery of an equipment malfunction and MEL deferral.

q) Tim referring back to issuance of InFO and Dennis' comment that he was now placing the information into PL so as to influence changes in MELs through MMEL guidance. Dennis stated that is because InFOs are just that, information only and not binding. Tom Atzert (UAL) disagreed stating POIs were demanding operators comply strictly because of InFO's issuance. John McCormick stated if the intent is mandate change in MEL practices then it needs to be moved to 8900.1. Dennis stated one of his goals is to draft such guidance material.

r) Discussion continued on how aircraft dispatchers are already assigning these codes, and placing such specific directions within an MMEL is not needed to change something already been done. Tim Kane attempted to summarized and propose the workgroup be re-convened to massage the language of PL. John McCormick interjected that MMEL provisos should list requirement that needs to met, not how it is to accomplished.

s) He also proposed that the title of PL needs to be changed to LRCS and not HF Communication Systems. Dennis Mills stated HF is and will remain the primary and thus title to remain unchanged. Todd Schooler (Cessna) supported John's suggestion as he reports many of their overseas customers re-publish the FAA MMEL verbatim but in regards to this item HF is not their primary System. Dennis again disagreed. John McCormick countered back with comment that per FAR 1, LRCS is defined as Satellite, Datalink, and then HF in that order of priority.

(Continued)

IG 90 AGENDA DRAFT 00

90-15: PL-106 HF Radio Communications MMEL Requirements (Continued)

t) Members assigned to Workgroup updated:

FAA Lead, Dennis Mills (AFS 240)
Industry Lead, Dave Edger (UPS)
Members:
John McCormick (FDX)
Tom Atzert (UAL)
Dennis Landry (ALPA)

Sideline issue:

Agenda discussion was re-opened with recommendation that InFO 12018, on aircraft CNS capability flight plan coding, needing to be inserted in MEL remarks and exception column be opened up for further group discussion. Greg Janosik requested group defer discussion until next IG when author of InFO, Gordon Rother, can be present.

Item remains OPEN.

IG-90 (Ref – Attached proposal)

ACTION: – Review revision proposal to PL-106 and ICAO 2012 implications

LEAD: FAA Lead, Dennis Mills (AFS 240)
Industry Lead, Dave Edger (UPS)

Workgroup
John McCormick (FDX)
Tom Atzert (UAL)
Dennis Landry (ALPA)
Tim kane (JetBlue)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-16: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)

Objective: Discuss need to draft a PL for HUD and EFVS

Item Lead: FedEx – John McCormick

Discussion:

IG-87: (No attachment)

John McCormick (FedEx) did not have a PL draft prepared for presentation, instead he outlined the intended scope, need for such a policy. He gave a description of the HUD / EFVS that FedEx is installing and then referred to other HUD systems that are been installed by other operators by STC or by manufacturers as TC equipment. He stated although they are different they all encompass the same basic functions, components and thus he felt a standardized MMEL for HUD and EFVS would be beneficial.

He stated these systems are already coming on line and there are already differences in MMEL relief. He stated since FedEx has been operating their system now for several years he felt FedEx could put together a PL have was very representative of industry overall. Todd Schooler (Cessna) disagreed as he stated they have a system that displays on the co-pilots FMS and thus not a separate overhead system. John stated that the FedEx HUD would not address that as it was a true overhead, heads up, with a synthetic overlay of forward vision that is being used to apply for low visibility takeoff and approach minimum approvals. He re-stated that although there are differences the basic functionality and thus a basic MMEL standard, particularly repair categories could be agreed too. He asked if the group could agree with that then he could draft a PL for group review. He opened the floor to discussion.

Todd Schooler re-emphasized it must take into account differences in operating rules. Gene Hartman (FAA LGB AEG) outlined several different types of HUD versus Enhanced Vision systems, particularly within the private and business jet community and it was also stressed that they are often standalone systems, HUD and Forward Vision Systems using different technologies. He concluded if PL was to be drafted it needs to encompass all technologies. John responded that he volunteered to put together a PL based upon his experience with the FedEx IR on HUD system but was not as familiar with other synthetic vision systems such as millimeter wave radar but he restated that they all have the same general functions and thus we should be able draft MMEL relief applicable to all.

An AEG member presented asked how was flight crew training of HUD/EFVS was being implemented. John explained how currently HUD/EFVS is in MMEL at D category level and crews are being trained and encouraged to use equipment enroute. He reported that as fleet becomes 100% equipped flight crews will be been given more specific training on using equipment in lower landing minima (LLM) environment and company is preparing to submit to FAA for Opspec authority to take credit for system. He reported at that time MMEL would have to reflect a C Category for repair.

Suggestion was made to split EFVS from HUD and have two PLs. Bryan Watson, (FAA SEA AEG) commented that they are required to be combined to take credit for takeoff and landing. He outlined the differences in enhanced vision, synthetic vision system (SVS) as compared to combined vision system (CVS). John asked Brian if it should therefore be a combined HUD/EFVS policy letter or a separate one for each, HUD and EFVS. Brian concluded he felt separate letters but he stated it would be dependent upon the technology used, SVS or CVS. He explained that SVS is a totally separate system from HUD while CVS is presented on the HUD combiner, etc. Brian stated that would be something that a workgroup can resolve.

Workgroup volunteers:
John McCormick – FedEx (LEAD)
Bryan Watson – FAA SEA AEG
Brian Holm – Alaska
Ray Adams - Alaska

(Continued)

90-16: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS) (Continued)

IG 88

Action - John McCormick (FedEx) provide update of workgroup progress.

John stated that there are issues that still need to be resolved and he requests a postponement on presenting any drafts until next meeting.

Item remains OPEN.

IG 89

- **Action -** John McCormick (FedEx) will provide an WG outline
- The work group to meet on day two.

Lead: John McCormick – FedEx
Bryan Watson – FAA SEA AEG
Brian Holm – Alaska
Ray Adams - Alaska
Tim Kane - JetBlue (Added)

a) John McCormick (FDX) again requested that item be postponed until next IG meeting. He stated his draft was not ready and needed more time. Tim Kane reminded John that a workgroup meeting was scheduled for day two of this IG and he asked if John would have his draft available for the group to work on. John proceeded to describe the layout of the proposed relief. He stated the intent was to group HUD with EVS.

b) Paul Nordstrom (Boeing) stated that cannot be done. John disagreed He stated he needed to poll the group on the design of his proposed relief. He described that some HUD systems are being certified for use in providing takeoff and approach guidance only, others that only provide flight guidance, and approach guidance, different variations exists. He said because of the design differences he his thought was to divide the PL proposed relief with three different categories with different provisos for each.

c) Gene Hartman (FAA AEG LGB) stated he did not understand why this needs to be PL issue. He stated he thought it should be an Opspec issue. John defended his position that a PL was needed because as these systems have been activated different FOEB Chairman have arrived at different standards of relief even though the equipment, as John sees it, is very generic in nature. He felt an uneven playing field now exists between fleet MMELs, different categories, different provisos, etc.

d) He stated his draft PL would standardize relief and address sub-systems that as yet have not been employed making allowance for future growth. He concluded that it is an Opspec states as to what an operator's operation is allowed to do but while a MMEL PL set a standard of relief would exist. He stated he envisioned the PL allowing for both C and D category of relief.

e) Tim Kane reviewed who was on the Workgroup and a few additional members were picked. Workgroup was meet after later in the day and report progress at next IG

Item remains OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-16: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS) (Continued)

IG 90

ACTION – Provide update on workgroup progress and revision proposal outline

LEAD - John McCormick (FedEx)

Workgroup
Bryan Watson – FAA SEA AEG
Brian Holm – Alaska
Ray Adams - Alaska
Tim Kane - JetBlue (Added)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-17: MMEL relief for Emergency Escape Path Marking Systems

Item Lead: Tom Atzert (UAL)

Discussion: The issue is that relief is provided for these systems in a similar manner across MMELs, The issue is that relief is provided for these systems in a similar manner across MMELs, which basically allow relief for redundant bulbs, assemblies or strips that are not required to meet minimum certification lighting requirements. However, Emergency Escape Path Marking Systems are not required for Part 91 or Part 125 and for those operations, the MMEL should provide relief for any or all parts of the system.

IG 88

Dave Burk (Aerodox) opened discussion stating the vast majority of MMELs have the same set of basic provisos that state limitations and conditions of applicable STC are observed. That works well for Part 121 operators. He stated the problem surfaces when applied to Part 91 or 125 operations. He outlined a situation where an operator had two identical type aircraft, one with the system installed, and one without. He stated the system is not required by regulation on Part 91 operated aircraft some STC holders have not provided the necessary data to support the MMEL. Tom Atzert (UAL agreed and stated he and Dave wanted the group to entertain opening up a PL on subject.

Gene Hartman (FAA AEG LGB) that he felt the STC information is usually readily available. Tom stated that even at his airline (UAL) they have experience this with older installation. He cited an example of cabin retrofit of B747 where they were unable to get the STC data from the original installation. Todd Schooler stated their STC information is not readily disseminated as it is proprietary and he stated thus the MMEL are not all appropriate. Paul Nordstrom (Boeing) also stated that they do not address systems retrofitted onto their aircraft. He stated this MMEL language came into existence before system was regulatory required and STCs initially provided the system.

Paul stated MMELs needed one more mode of relief that states ‘may be inoperative provided not required by CFR’. Question was raised, does that need to a PL or should it be something addressed via each MMEL thru the FOEB process. Greg Janosik state he did not see a PL needed. Dave Burk countered that the FOEB process takes too long to address and does not ensure standardization across MMELs. Discussion of pro and con of both approaches continued with no agreement. Dave stated some of these MMELs are many years out of date. Greg again stressed he felt no PL warranted. He stated FAA HDQ will not issue a PL as a means negating the need to update an MMEL. He challenged the group to better define what they want to change as he heard no concensus from the group. Dave Burk stated he will canvass the AEG groups and bring feedback on AEGs preference, fix the masters or open a PL to next meeting.

Item remains OPEN.

IG 89

Tom Atzert – Provide update

Tom Atzert (UAL) stated this was Dave Burk (AeroDocs) item and he had nothing to report. Tim Kane stated item can remain OPEN to allow Dave a chance to provide input next meeting.

(Continued)

Agenda for MMEL IG 90

April 17 & 18, 2013 **Cessna - Wichita, Ks.**

90-17: MMEL relief for Emergency Escape Path Marking Systems (Continued)

IG 90

ACTION - Provide update for Emergency Escape Path Marking Systems

LEAD - Tom Atzert (UAL)

Note; This was Dave Burk (AeroDocs) item and he had nothing to report. item can remain OPEN to allow Dave a chance to provide input next meeting.

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)

Objective: Improve and clarify content of MEL Sections of 8900.1.

Item Lead: Greg Janosik FAA (AFS- 240)

Discussion: Industry and FAA inspectors continue to struggle with intent of various portions of 8900.1 MEL guidance.

IG 78 NOTE: Steve Kane advises that tentative start date for project is June, 2010.

IG 78:

8900.1 Vol4 Chpt 4 re-write project. Steve Kane reported that Bob Davis wants this section re-written starting this summer. Steve has been tasked with forming a working group along with industry involvement. The group will consist of industry and AEG.

Submit to Tom Atzert your name via e-mail if you wish to participate in this effort. Will be 2 face to face meetings and the rest will be telecon. Probably 3 from IG will participate, but more IG members may be involved to assist those chosen. Tom will organize telecon for those interested, and to select industry working group members.

IG 79:
Steve Kane updated the group on 8900 re-write. Meeting in Kansas City in mid July resulted in Part 91 being 85-90% complete. Third week in October for next meeting in Kansas City, work on Part 121 and 135 will begin. Rick Chitwood to fill in for Steve Kane during that meeting.

IG-80:
8900 re-write is in progress. Part 91 section completed and undergoing final review. Part 121/125/135 sections in work.

FAA took action to check on FAA review/approval process regarding an operator's submittal to add a new fleet type to their existing MEL program.

IG-81:
Greg Janosik AFS 240 briefed IG on progress of 8900.1 rewrite. Solid link between 8900.1 V4 C4 CDL MMEL and V8 C2 AEG and MMELs. AC 25-7A is the only published guidance on CDLs. He is looking for more published guidance. Reference MMEL IG 81 power point included with the minutes.

IG-82:
No updates given except FAA budget restrictions have led to no progress since last report.

IG-83:
Greg Janosik (AFS 240) presented progress on combining the current 11 sections of 8900.1 Vol 4/ Ch. 4 MEL/CDL. In this process some 64 PLs are to be incorporated in 8900.

The rewrite to create only four new sections:

4-4-1:	MEL for Part 91, sub-part K
4-4-2:	CDL
4-4-3:	MEL for all other Parts, 121,
4-4-4:	NEF

Sections 1, 2, and 4 almost complete except for final review. Section 3 is 50% at time of this meeting. A workgroup session is planned for the end of MMEL IG. Plus one final meeting to be held 6-7 Sept in Kansas City. All four sections to be submitted to FAA Document Control Board for final internal intra-departmental review pending final approval in the month of October, 2011.

(Continued)

90-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

8900.1 Vol 8, Ch 2 the AFS / FOEB process has already been rewritten and it incorporates approximately 30 FAA PLs and when finally released these PL will go away. It broken out as follows:

Re-write of sections 3,4,5,6, 7 & 8

3-4 under review with AFS 200, 5, 6, 7 & 8 are with AFS 140 who were described as contractors (assumed to mean tech writers) who prepare and disseminate the document to the internal FAA departments. Thus it is a work in progress. No final date could be given.

Bob Wagner and Scott Hofstra requested a talk on the new section 1 to 8900 Vol 4 / Ch 4. that was just released 07/27/2011. FAA members present requested deferment of this discussion until the next morning.

IG-84:

Greg Janosik (AFS 240) outlined the progress, he stated section one, CDL, is completed, section two, Part 91 MEL, is under serious re-write, section 3, MEL for all Parts other than 91, is done, and section four for NEF is done. Once section two is done all four sections will undergo internal FAA AFS 200 review, then final inspection by the re-write group and on to the internal FAA Document Review Board (DRB). DRB turnaround time is typically 30 days and then posting to the Federal Register. Target date for final is end of December 2011.

(Continued)

It was questioned how long of a review the rewrite committee will have to review and comment. It was mentioned that they should save comments for the posting to the Federal Register. Some dissatisfaction was registered with the decision. Pete Neff (AFS 240) stressed it must go out on to the Federal Register as they have been directed to do so to show compliance with the Federal Administrative Procedures Act. He stated the Federal Register is the vehicle that is designed to keep and record comments and how the comments are resolved (similar to how the PL comment list document is now structured).

Finally, Joe White (ATA) asked if the rewrite involved more than just 8900.1 Vole 4 / Ch 4 and Greg responded that it also included the AEG section known as Chapter 8, section two. He stated the rewrite significantly reduced that size of the manual and in doing so incorporates numerous Pals. Greg outlined that the Vole 4 / Ch 4 rewrite incorporated four PLs and the AEG chapter some 28-29 PLs. Comments were made that if the intent of having a PL is for flexibility of timely revision and dissemination of information, then is this lost once rolled into 8900 as when 8900, in order to address changes, must go out to Federal Register? Pete Neff outlined how in future even PLs that invoke a significant change in policy will need to go out to the Federal Register as well. He stressed this was still under much discussion as to how much flexibility AFS 200 will have on keeping the current handling of PL as they are, and their ability to determine what constitutes significant change.

Item remains OPEN.

IG 85: (Ref 8900 V4 C4 Rewrite Status)

Greg Janosik (AFS 260) started the he gave some erroneous information that the rewrite will be going to Federal Register by end of last month (Dec 2011) as that is now physically impossible to make it even by end of current month (Jan). He gave an update on where the re-write is at, all 4 new sections of Vol 4 / Ch 4 done, industry comments on which is being currently reviewed. He re-stated that documents were originally to go to FAA Document Control Board (DCB) in December. He states this milestone has not been met. He reported before further posting can happen the document must finish it way thru the internal (DCB), comments which have been extensive have to be answered and then back to tech writing (

Continued)

IG 90 AGENDA DRAFT 00

90-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

contractors for finishing. He now projects contractors finishing final draft as late as Jun/July, Final internal FAA review and then Fed Register posting for comments, response to comments in late summer and published no sooner that Sept 2012 or later time frame

He then report that other portion of re-write, AEG guidance section Vol 8, Ch 2 sections 3,4,5,6,7 & 8, are with contractor and as yet no completion date. He reported the third part of 8900.1 re-write, AFS 50 International Branch section, is moving along but that all the three portions of 8900.1 will not be released until all are ready so the long pole appears to be the fact that all three still must go to Federal Register.

Item remains OPEN.

IG 86:

Please refer to minutes of IG Agenda item 86-24 for comments on this topic.

Item remains OPEN.

IG 87:

8900 Vol 4/Ch 4 is under internal FAA review via the Document Control Board (DCB) process. Greg reports it is getting favorable comments at the moment. After the DCB it is scheduled go to AFS 140 and undergo contractor review, editorial work and then subject to a final formal comment and review and eventual sign off. He reports this can take up to six months to complete.

Greg then reported 8900 Vol 8/Ch 2, the AEG/FSB piece of document, is at his desk for review. He stated after his review he will forward it to DCB where it will follow the same sequence of actions already outlined that Vol 4/Ch 4 is currently undergoing.

Joe White (A4A) asked if there was a central point of contact in legal for review of documents undergoing DCB process. Dean Griffith (FAA Chief Counsel's office) stated if they are to be reviewed by legal then it would be his office. Greg Janosik clarified that would be AGC 220, Operations Law Branch, Regulations Division.

Action Item: FAA

Item remains OPEN.

IG 88

Action - Greg Janosik (FAA) provide update

Greg stated that unfortunately he cannot report any progress. He stated it has been out for comment internally at HDQ and he has received four comments that he needs to resolve but it has been sitting awaiting higher departmental consideration. He reports upper management has some higher priorities that have essentially stalled progress. He states one of the issues is one of document format. He also reported there was a management vacancy existed that has only recently been filled and he hopes this development will help move, advance the issue.

John McCormick (FDX) brought up a sore point for industry that of PLs have been archived and promised to be incorporated into 8900 rewrite. He stated that apparently some of folks in the FAA who are privy to the rewrite have reported that certain PL topics as they are incorporated have been changed and they are using their knowledge of change to deny relief. He was referring to archiving P-52, Category D. Members from AEG SEA are now denying Category D relief based upon new criteria they report is contained in rewrite. John requested a copy of draft of the AEG chapter. Greg stated he was unaware of any change.

(Continued)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

Greg reported the AEG guidance, Vol 8 draft, is not in a finished format but he will look into making available a copy of the Category D guidance as found in rewrite draft.

Paul Nordstrom (Boeing) stated he has a copy and informed John that what he seen in draft and also in knowing the particular FAA AEG members involved he doubted they could be persuaded to change their position in a way that would be suitable to satisfy John request.

Item remains OPEN.

IG 89

Action - Greg Janosik (FAA) provide update

a) Greg Janosik (AFS 240) stated the 8900 rewrites, Vol 4 / Ch 4, the MEL/CDL section, and Vol 8 / Ch 2, the AEG chapter are done with DCB review and currently sitting back on his desk. He stated the volume of Policies and Notices generated the past quarter has consumed all his time.

b) Greg then stated that he cannot to attest to fact that everything contained within PLs, archived for the purpose of incorporation into 8900 re-write, have indeed been incorporated. He promised to complete his administrative actions on documents before next IG meeting. He also promised the group that he intends to get FAA final action, decision on outcome to draft PL 98. He concluded that he will have a better update on the status of 8900.1 re-write at next meeting.

c) Another 8900.1 issue: The following NOTE that came into existence with the release of CHG 167 to Vol 4 / Ch. 4, Section one, dated 8/23/12:

NOTE: Anytime a certificate holder or program manager includes a reference to a particular manual chapter and/or section in their FAA approved MEL, that chapter and/or section of the referenced manual is also required to be approved by the FAA. This is true even if the manual itself is only required to be accepted by the FAA.

a) Mike Baier (AAL) reported that their CMO recently instructed them that they will no longer approve MELs that contain references to other manuals such as AMM references. Kevin Peters (FDX) asked if this was referring to AMM references that are contained in manufacturer's DDGs. Mike responded, 'no matter,' any reference to another manual.

b) Kevin asked if this was pertaining to the NOTE (extract above). Mike stated yes. Greg Janosik stated he understood that the 8900.1 re-write removed the NOTE and Kevin stated that as a participant on the industry input to re-write this was a true statement. Greg stated he was aware that getting the 8900.1 re-write out would solve a lot of issues. A member of group asked if Greg could call and tell POI that this is subject to change. Greg stated until it is approved policy, guidance, he cannot

Item remains OPEN.

IG 90

ACTION - Provide update on FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)

LEAD - Greg Janosik (FAA)

IG 90 AGENDA DRAFT 00

90-19: ATA MMEL/MEL Value to Industry Survey

Objective: To determine overall $$ value of MMEL / MEL to industry. Once the value is determined, provide the numbers to upper management via ATA EMMC. The financial contribution the MMEL IG makes to industry is significant and this needs to be communicated properly to upper management.

Item Lead: Mike Bianchi/ATA

Discussion: Task ATA to provide updated numbers on the value of MELs to our industry.
ATA (Mark Lopez) will work with UA (Tom Atzert) to develop survey that will be used to collect the data needed to determine the value.

IG-82:

Dave Landry (DAL / ALPA) stressed the value of the MEL, that collection of this data should be of great value and the survey should be something everyone should support. It was requested that ATA HDQ again send out the survey. It was questioned if this will be a new version of survey or old one. Apparently there is no plan to revamp the existing survey.

IG-83:
ATA representative not present.

Item remains OPEN.

IG-84:

Mike Bianchi (ATA) stated a revised survey was available and he inquired as to how it should be distributed. E-mail was the response. Tim Kane (Jet Blue) brought up the topic of an IATA survey on MEL deferrals that is apparently different in nature to the ATA value to industry survey. Scott Hofstra (UPS) states it asks questions such as size of operator fleet, average number of MEL deferral per day, average time to clear MEL deferrals, etc. He offered to forward it to Mike Bianchi at ATA.

Item remains OPEN.

IG-85:

Mike Bianchi reported A4A has put out a survey to the airworthiness committee and feedback will be provided to the IG group when it is available. Bob Taylor asked if this agenda item should remain open, and when will results be available. Mike inferred he expects something should be available by the next meeting. Tom Atzert (UAL) requested if a copy of survey could be made available. Mike offered to send it out for the IG group to review.

Item remains OPEN.

Action item: Mike Bianchi, A4A

IG-86: (No attachment)

Mike Bianchi (A4A) reported that due to computer 'malfunctions' he does not have any output to present to the IG at this time.

IG Industry Chair's Note – Mike Bianchi has since departed A4A following IG 86; the position of MMEL IG A4A Chair is now held by Joe White.

Action Item: **Joe White –** Provide A4A survey to the airworthiness committee and feedback to the IG group

(Continued)

90-19: ATA MMEL/MEL Value to Industry Survey (Continued)

IG-87: (No attachment)

Joe White (A4A) stated A4A was working to collect data via survey to determine cost / value of having an MEL program. He stated it was an A4A initiative and he asked that was there any other entities interested in collection of this information. No one in the group spoke up. Joe outlined the some of the working tasks A4A was working on for behalf of the industry; he mentioned that the EMMC has been requesting an assessment of the value an operator gets from having an MEL program. He then stated he hoped that other parties had expressed similar interest, or if it was just an internal, A4A, interest. He stated he knew that there have been attempts in the past at such a survey. He mentioned one that involved the capture of the length of time MELs were being used.

He outlined how A4A was planning to add a staffer to re-engage in survey collection activity. He stressed he felt there was value of the MEL program that needs to 'keep in the fore front.' He stated we all should be concerned about the cost saving the program delivers. He lists off costs industry would go thru without the benefit of MEL program. How funding of support groups like the AEGs, etc., can be justified by knowing the value of the program.

Action Item: A4A

Item remains OPEN.

IG 88

Representative for A4A stated that with recent personnel changes occurring there has been little to no action on the advancement of survey. He stated he has been researching the past history of survey and outlined how previous surveys focused on cost of delays and cancellations avoided. He referred to as very rudimentary, simplistic. He stated he wants know how in detail the group would like to take this.
He wants to get a draft prepared for next meeting. He asked who in industry wants to participate. Tim Kane (JetBlue – Industry Chair) outlined how the saving demonstrated for his airline was of tremendous benefit. General discussion on scope and outcome of last survey was discussed. The A4A representative requested carriers who previously provided data to send whatever details they can so he can evaluate how previous survey was conducted.

Item remains OPEN.

IG-89

Action Item: A4A

Item remains OPEN.

Bob Ireland (A4A) stated that this is not a rush item and they would like to hold off forwarded the survey at this item and work on refining it further.

Bob Ireland (A4A) spoke to status to the survey stating there was continued interesting in pursuing but they do not feel there is a need any rush to complete. He said it has been spoken about how best to refine the data fields, etc. There has no been any real action to report since last meeting.

Item to remain OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

90-19: ATA MMEL/MEL Value to Industry Survey (Continued)

IG-90

ACTION: A4A provide update

LEAD - Bob Ireland (A4A)

Item to remain OPEN.

IG 90 AGENDA DRAFT 00

90-20: PL 72 Wing Illumination Lights

Objective: Latest revision to PL 72 came effective he noted it did not account for the existence of standing ADs.

Item Lead, Gary Larsen (FAA SEA AEG)

IG 87

PL 72: Wing Illumination Lights: Gary Larsen (FAA SEA AEG) stated that after latest revision to PL 72 came effective he noted it did not account for the existence of standing ADs. He did not have the AD number(s) but stated it addresses operations in severe icing condition and that there was a wide spectrum of aircraft operated under all Parts, 91, 135, 121, etc. He cited another regulation that states item(s) required to be operative cannot be given relief under MMELs. He outlined how the PL categorizes the MMEL relief into different configurations, differentiated by whether or not aircraft that ice detection system is installed, and / or whether or not wing leading edge are visible from the cockpit. He stated the PL has a GC header assigned and that gives an operator license to apply the MMEL relief and then could be in possible violation of an AD.

He stated he did not know what was the best approach to fix this? He stated a possible solution was to remove the GC header or add additional provisos that ensure AD requirements are addressed. Tom Atzert asked if Gary could list off the aircraft affected by these ADs. Gray stated they were predominately older model turboprop aircraft without power control. He listed off the aircraft. He stressed while majority were smaller aircraft some such as the Saab 2000 were potentially capable of being employed in large air carrier status.

Greg Janosik stated he wanted Gary to revise PL, send to Greg for posting. Greg stated he will only leave it out for posting for a very limited time. Plus he stated that this is the type of subject matter that he felt FAA would have to issue an FAA Notice with amended PL to instruct POIs to review their operators MELs reflect the corrected relief.

IG 88

PL 72 is also a carryover from last meeting. John Pinnow (FAA AEG SEA) spoke on behalf of Lead, Gary Larsen. He will ensure Gary is aware of the comments that have thus far been posted to FAA comment grid and that he needs to respond for next meeting.

Topic of problems with making comments to documents posted on the FAA comment grid was discussed. It was stated comments need to be forwarded to George Ceffalo (AFS 240) and not to the submitter. Yet both e-mails apparently are listed and it was stressed that while in important to communicate with the submitter nobody will be aware of it unless it gets to George for uploading.

Paul Nordstrom (Boeing) asked if the draft on web site for comment was considered acceptable. Todd Schooler (Cessna) stated he felt the relief offered was not good at all. Some on the details were discussed and Paul requested PL be withheld from it going final until after comments are addressed at next meeting

Item to remains OPEN.

(Continued)

IG 90 AGENDA DRAFT 00

90-20: PL 72 Wing Illumination Lights (Continued)

IG 89

Item Lead: , Gary Larsen (FAA SEA AEG)

- Provide Update

John Pinnow (FAA SEA AEG) stated he will attempt to get input from Gary. Greg Janosik responded that those have already been received and posted to the FAA comment grid. He stated we need to wait for Todd's response. Todd stated he was planning to respond as Gary was citing out-of-date data and totally undoing what was initially proposed. Greg asked John to ask Gary to communicate with Todd.

Item remains OPEN

IG 90

ACTION – Provide update on revision proposal PL 72 Wing Illumination Lights

LEAD: Gary Larsen (FAA SEA AEG)

IG 90 AGENDA DRAFT 00

IG 90 AGENDA DRAFT 00

90-21: PL 105 Automatic Dependent Surveillance-Broadcast System

Objective: Revise PL to include UAT system used by general aviation, and general ADS-B guidelines

Item Lead: , Paul Nordstrom – Boeing (LEAD)

Workgroup
Lead
Workgroup volunteers:
Paul Nordstrom – Boeing (LEAD)
Tom Atzert – United
Tim Kane- JetBlue
John McCormick – FedEx

Action - Paul Nordstrom (Boeing) to provide update on workgroup.

a) Tim Kane (Industry Chair / JetBlue) opened the discussion stating PL-105 is the new ADS-B PL. John McCormick (FDX) questioned why then is the ADS-B function, known as Extended Squitter, in the transponder PL, PL-76, and not being captured in PL-105. Instead all other ADS-B functions, except extended squitter, are in PL-105. He stated moving extended squitter to 105 would clearly delineate 76 as the Transponder PL and 105 as ADS-B. Paul countered that if Transponder breaks then extended squitter is lost.

b) Dennis Mills (AFS 240) reported that other factors are at play here, first he reported that there are separate Opspecs between ADS-B IN versus OUT, next there are potentially 13 different applications for ADS-IN that are scheduled to coming down the line. Next he referred to a Transponder switchover that is not scheduled until 2020, thus he reports he feels this justifies Transponder remaining segregated for now.

c) Paul Nordstrom (Boeing) stressed the PL-105 was a preliminary draft at the moment. He spoke issues just raised by Dennis have been incorporated in the Discussion section regarding the application of IN and that it will not be mandated in US until 2020. It was stated that ADS-B is already required in other area of the world such as Australia and will be required per ICAO in 2015.Thus he stated the current proposal is very general in nature, merely a C and D MMEL relief proposal. Greg Janosik (AFS 240) stated it can be posted as currently drafted but he rather have the workgroup continue to work on it further, thus decision to post was deferred until after next IG.

d) Discussion pursued on the issue that extended squitter is an ADS-B OUT function still residing in PL -76. Finally after more debate on appropriateness of this separation, Paul finally proposed a cross reference statement can be added to the PL-105 that states for extended squitter relief operators are to refer to PL-76. Greg initially agreed but then stated, eventually but not until its timing is appropriate, the extender squitter will switchover then relief move to PL-105. PL-105 will be vehicle for all future ADS-B functions coverage.

Item remains OPEN.

(Continued)

90-20: PL 72 Wing Illumination Lights (Continued)

IG-90

ACTION: Revise PL to include UAT system used by general aviation, and general ADS-B guidelines

LEAD: Paul Nordstrom – Boeing

Workgroup:

Tom Atzert – United
Tim Kane- JetBlue
John McCormick – FedEx

IG 90 AGENDA DRAFT 00

90-22: PL 31 R4D0 MEL Format Specification (Attach PL-31)

Objective: Revise PL to include color text

Item Lead: Todd Schooler – Cessna

- Todd to provide discussion

a) Todd Schooler (Cessna) opened discussion on proposal of adding color coding to MMEL revisions. He presented examples of how the Bombardier, -700 aircraft had introduced this into their documents and Cessna is entertaining doing this within their masters too. He stated color could be used in lieu of rev bars to show change. John McCormick (FDX) stated that there are problems that can occur where a color coded document is printed as it does not always re-produce correctly and hence what is changed is not always readily apparent.

b) Bob Davies (AFS 240) stated a problem is that FAA creates their documents for a large diverse group of operators and not all can take advantage of the same level of technology and thus he is concerned FAA will have to possibly re-produce different types of documents. He stated he is not therefore not in favor and considers the use of color as having limited application. George Ceffalo (AFS 240) also spoke out against this stating different level of resources and capabilities exists between different FAA regional offices too. John Pinnow (FAA AEG SEA) also spoke in disfavor as to the multitude of possible conventions, i.e., what different colors could mean between manufacturers, etc. John Hientz (Transport Canada) stated how they have adopted use of color with most favorable reception from their client users.

c) Todd stated he was not pushing for all to adopt this, but just allow it as an option for manufacturers such as Cessna and Bombardier who choose to use color. He stressed its currently only applied to EICAS messages and rev bars. Greg Janosik rejected this stating FAA would have to mandate the prescribed color code to be used and the variation of colors palates and printers available can lead to non-conformance to a set standard. He stated there are too many variables and FAA will not sanction anything but black ink print. Todd asked for consensus on whether this topic should be further pursued. The pro and con discussion continued. Greg Janosik stated he did not have issue with color being used at the operator level and he even would support adding language to 8900.1 stating so, but he ruled it out at the MMEL level.

d) Last of all a member from the group stated that while he did not feel the issue of color coding is necessary action for policy now, he was in favor of seeing changes that incorporate old text being marked with a strike thru and new revised text shown in color. He stated this is something very useful compared to rev bars in determining what is changed.

Item TABLED.

IG -90: (Attach PL-31)

ACTION: Revise PL 31 R4D0 MEL Format Specification, to include color text

LEAD: Todd Schooler – Cessna

IG 90 AGENDA DRAFT 00