

MMEL IG 93 MEETING - MINUTES

January 29-30, 2014

Embry-Riddle Aeronautical University
Daytona Beach, Florida

Tim Kane
JetBlue Airways

Industry
Chairman

Greg Janosik
FAA AFS-240

FAA Co-
Chairman

Mark Lopez
A4A

A4A Co-
Chairman

Donn Reece
American Airlines

Industry Vice
Chairman

Kevin Peters
FedEX

Recording
Secretary

Todd Schooler
Cessna

Meeting
Secretary

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Industry Chairman Note:

The Minutes for MMEL IG Meeting 93 are provided by the Recording Secretary.

These Minutes are presented in a new format as a test from the Industry Chairman. In previous versions the minutes were distributed along with the a re-release of the meeting agenda in an continuing flow.

This has proved to become a lengthy book of a large file size.

The intent of this format is to reduce the file size of the minutes and only include the updated information. A discussion is planned for IG 94.

Very Best regards,

Tim Kane
Manager- MEL Programs
JetBlue Airways Corp.
27-01 Queens Blvd, 7th Floor,
Long Island City, NY 11101

Industry Chairman

93-01a: Embry-Riddle Aeronautical University - Welcome and Safety Brief

The Welcome and Safety Briefing were provided by Staff of Embry-Riddle Aeronautical University.

Lisa Kollar, Executive Director Corporate Relations (scottl@erau.edu), and

Adriana Hall, Assistant Director-Office of Corporate Relations & Government Affairs
(hall6a0@erau.edu)

- The accommodations at Embry-Riddle Aeronautical University were well suited for the MMEL IG meeting. There was a welcome atmosphere and positive recognition was given to their Graduates by the Alumni Association. Additionally, several members were able to take the tour and it was very informative.
- All of the necessary and ancillary resources were available for IG use (IT, Tele-com, audio, Internet, and projection displays).
- The use of Embry-Riddle Aeronautical University proved to be a cost effective solution for a future IG meetings as the use of the facility was complimentary.

The generosity Embry-Riddle Aeronautical University is greatly appreciated.

93-01b: Introduction / Administrative Remarks

a) Tim Kane (JetBlue) Industry Chairman held elections:

- Tim Kane will turn-over the Industry Chair position to Donn Reece who assumes the responsibility of the 3rd Quarter meeting (IG 95). Best of Luck to Donn.
- Tim Kane (JetBlue) nominated George Roberts (Delta Airlines) for the position of Industry Vice Chairman and the nomination was seconded by Mark Lopez (A4A Chairman). George assumes the responsibility of Industry Vice Chair for the 3rd Quarter meeting (IG 95). Congratulations to George for accepting the vital role.
- Kevin Peters volunteered to continue as the IG Recording Secretary.
- Todd Schooler remains on as Meeting Secretary ad his position is available for elections as of the 1st quarter 2015(Continued)

b) IG 93 was a blended MMEL IG meeting with Webinar available (Adobe Connect). Adobe connect is hosted by A4A:

- There were a few technical glitches experienced during the meeting that appeared to be attributed to the connected PC entering sleep mode after being connected for a period of time.
- Those who had attended the IG Meeting via Adobe Connect were marked as present.
- Courtesy protocols need to be a set of in place for web connect use.
 - Phones should be muted and speakers should identify themselves.
 - This has had an impact on our ability to track the discussions for inclusion in the meeting minutes.

(Continued)

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- c) The IG Member new format list was presented and used for the first time:
 - The end result proved to be useful for providing a concise report of IG participation.
- d) Additional IG meeting secretary support:
 - Topic was discussed with ALPA and determined that further action would need to be on a case by case basis.

93-02: MMEL IG/FOEB Calendar

Tim Kane (Industry Chairman / Jet Blue) opened with requests for calendar FOEB additions, schedule changes:

First Quarter 2014

- Gene Hartman (FAA AEG LGB) stated he there was to be a DC-9 FOEB to be held on February, 4-6, 2014.
- Thiago Viana (Embraer) E170 Electronic FOEB Feb 10. Brian Watson is the contact.
- George Ceffalo (AFS 240) stated a Bombardier C Series FOEB that was being slipped to end of March 2014.
- Tim asked about Gulfstream jets which Gene stated was a G280 then listed a G6 FOEB April, 22-24, 2014. He then listed a G2 FOEB for June, 10-12, 2014. These all to conducted at AEG, Long Beach , CA. He gave points of contact for each as:
 - DC-9: Mike Nash
 - G4: Tom Witts
 - G2: Tom Witts
 - G280: Steve Ford

Second Quarter 2014

Paul Nordstrom (Boeing) listed a B757 electronic FOEB for June, 2014. No actual dates given. AEG contact is Jim Vogt.

No further FOEB updates for 2014 calendar.

MMEL IG Updates

- IG 94 hosted by Delta in Atlanta, GA. April 23-24. Info available on the IG member portal.
- IG 95 hosted by Boeing Location to be Boeing Training Center in Renton. Dates set for August 13-14, 2015. Paul Nordstrom (Boeing) stated Boeing will not be able to provide ground transportation.
- IG 96 hosted by Southwest Airlines. SWA member stated location yet to be determined and no firm dates.

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At end of calendar Tim Kane (Industry Chairman / Jet Blue) spoke to the results of the IG Meeting Frequency Poll that delivered strong support (80% in favor) for stretching out the meeting intervals to only 3 meetings per year versus current four per year. Dispute that outcome Tim spoke in favor of retaining the current 4 times a year interval. He outlined how due to cancellation of IG 92 it has been six months since last meeting since the group last met and he felt that was too long a period for continuity of PL development. He claimed if a re-schedule to three meeting a year occurred then a backstop arrangement such as teleconferences would be required to keep the momentum going.

Mark Lopez (A4A) outlined that is exactly what the OpSpec Working Group (OSWG) had to do in order to ensure continuity. The OSWG holds an industry only meeting once a year to supplement the three formal meetings with FAA. He stated it is needed to support the movement on actions items. He finished with request to IG member to reconsider.

Next Tim presented a revised IG calendar he had labelled as the Tri-Annual IG meeting schedule with three formal meetings in last week of January, May and September. He states if IG went with such a schedule it would avoid disruptions due to holidays and other national events. He asked the IG to take this under advisement, along with Mark's proposal. Tim concluded the discussion on the fact that the upcoming meetings already have sponsors thru to end of 2015 and the IG leadership felt no adoption of schedule change is necessary for the immediate future.

John McCormick (FDX) stated previous meetings held in Washington DC have lead to better FAA participation and instead of changing schedule frequency more attention should be given to planning to meet in DC area. Bob Davis (AFS 200) spoke in favor of this suggestion. Todd Schooler (Cessna) reported that the administration of current meeting place, Embry Riddle Aeronautical University, has extended offer to host again if requested.

An agenda item recap of discussion was held. No real need to change schedule until 2016, followed by discussion on how FAA, the A4A, and other DC hosts meeting locations could sought out. The National Air & Space Museum at Dulles airport was suggested as a viable location. Mark Lopez (A4A) stated he would look into it; finally, Don Reece (AAL) offered to host IG 100, fourth quarter, 2015, at their facility at Dulles Airport.

93-03: MMEL Agenda Proposal & Coordination Process

Tim Kane (Industry Chairman / Jet Blue) opened discussion by citing the last change to document was removal, at FAA request, of any identification as this being an FAA document.

Tim stated he thus removed the FAA logo. He had the agenda attachment presented to show how A4A has now added a revision tracking section to capture history of change.

Tim then referred to agenda item workgroup and stated it has far appeared to have failed to generate any change as no drafts have thus far surfaced. Paul Nordstrom (Boeing) asked fellow workgroup member Kevin Peters if he had received his inputs for change and Kevin's responded he had but due to heavy workload had not been able move forward on a draft. Dan Leduc (Bombardier) reported he had sent inputs to Tim for inclusion into document. He listed them off as Republic Airlines is now Lead Airline for Bombardier C Series aircraft and that he is now this OEM's POC.

Tim stated workgroup must continue to advance drafts to update document as originally planned. He stated Greg Janosik (FAA AFS 240) has informed him that once industry finishes their job he plans to take output and roll it into an Advisory Circular.
Item remains OPEN. (Refer to agenda 93-34: Review Workgroup Assignments).

93-04A: Policy Letters Issued in Calendar year

Tim Kane (Industry Chairman / Jet Blue) referred to agenda attachment for PL issued during current calendar year. Bob Taylor (USAir) and Tim characterized them as 3 final releases and 5 in work,

A relatively modest amount in comparison to previous year. Tim informed group that document can be found on the web at A4A Members Portal/ EMMC taskforces/MMEL IG/Library.

93-04B: Policy Letter Status Summary

Bob Taylor (US Airways) outlined his color coding background scheme used to decipher the PL status summary document. He described them as:

- White: denotes PLs currently in work
- Gray: denotes PLs currently up on FSIMS for public comment/review
- Blue: denotes PLs finished with public comment and moved to FAA internal review

Discussion moved to the fact that their currently are no PL drafts remaining OPEN for public comment. George Ceffalo (AFS 240) corrected this stating comments on PL 106 was just re-posted for review again. Concern was expressed over where does the PL removed go once taken down from FSIMS was expressed. Bob Davis (AFS 200) stated they go thru the internal FAA HDQ review and coordination process.

George clarified by outlining time period for FSIMS draft posting and comment review, 30 day and 14 days respectively. Further clarification was made that is was a general guide and it can vary, for instance George stated PL 106 remained posted for 4 months.

George described how he annotates the status summary document and he directed attention to a note that FAA intends to 'strip out' PLs with GC headers. Tim Kane asked for clarification. George described how FAA plans to pull down certain PLs, previously identified during the benchmarking of GC 's with expiration dates, as inappropriately having a GC header. He stated they plan to revise by merely removing the GC header, and reposting without further comment.

Tim Kane (Industry Chairman / Jet Blue) drew the discussion back to issue of new FAA internal review process by asking George how many reviews does a PL go thru, after it completion of industry review, comment, etc. Bob Davis (AFS 200) stated how with the new process they go thru multiple departments and thru the AEGs as he stated a PL is basically a job instruction document to the AEG. Bob stated the re-write of 8900.1 has also been slowed by this enhanced flow process as it has received a lot of internal comments that must be resolved. He concluded with comment that once released a sizeable number of PLs will have been incorporated.

John McCormick (FDX) raised concern over issue of stripping GC headers from PLs and fact that PLs were being incorporated into 8900.1. He asked several questions such as what if MMELs have not all been updated by the GC header expiration date. George referred to a grandfather clause. John countered with his concern that removal of GC status without discussion, comment, would lead to degradation in standardization. George stated FAA felt revisions to MMELs can be undone by existence of outdated PL with GC status. Bob Davis referring back to earlier discussion that PLs are being incorporating into the handbook intended to be work instructions, guidance to AEGs. He stated the only purpose of GC status is to enable an operator to timely incorporate new relief into their MEL before the master gets updated. Once the MMELs become updated keeping the PL GC becomes irrelevant.

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Concern again [was expressed regarding older aircraft MMEs that may not get updated and PL GC expires.

Bob Davis gave a lengthy description of how the AEGs can accommodate operators of such products to get necessary MMEL relief.

93-04C: Policy Letters Under Revision (Closed)

93-05: MMEL AEG Draft Policy Letters Open for Comment

Tim Kane (Industry Chairman / Jet Blue) opened discussion with comment that this item has been retained on the agenda as placeholder to allow FAA to inform industry of any issues pertaining to PLs under coordination/review. Bob Davis (AFS 200) referred to 4 PLs that are currently in work, He gave an outline of how the FAA internal review is set up. He stated comments made to draft PLs posted on FSIMS go into HDQ and are shared with the different AFS branches 200, 300, 400 who's review is to ensure PL does not conflict with their polices, and then sent to AEGs offices for concurrence or feedback. In regards to the PLs current under review he said not all the AEGs have responded.

Bob stated that FAA is trying to improve the approval process for numerous FAA documents and in particular establish an audit trail of HDQ divisions' concurrence of PL actions, something he stated wasn't available in past. He attributed this to not having used the formal AFS publications process which is a laborious tasking. Instead they have developed a streamlined version of the formal process that requires the various divisions use the FSIMS comment grid and record concurrence, non-concurrence. Plus AFS 200 is required to resolve issues surfaced. He stated in general this has expedited PL finalization to the allotted two week window but using PL 106 as example where a lot of non-concurrence has led to multiple re-writes and thus its final released version will obviously be much different from the initial IG drafts, but he stressed all the substantiations have been recorded and can be followed by review of the comments, and dispositions of comments, posted on the PL's comment grid sheet.

He stated this is now the new process for developing MMEL revisions also. He also stated it behooves industry to use the new systems notification system; by entering one's e-mail stakeholders can get e-mails messages that comments have been added to the draft documents posted, thus keeping up on changes, etc.

Tom Atzert (UAL) spoke up expressing concern, confusion over this new FAA internal review. He outlined the steps that lead to development of a PL within the MMEL IG; stating that once consensus is achieved within IG, a draft gets posted to FSIMS for public review and comment, then IG lead must react to comments and any revised draft(s) get reposted. Finally PL draft is pulled into FAA HDQ for final preparation of posting.

He stated now it appears that PLs undergoing this new FAA internal review are subject to undergoing further revision changes, evolving into something outside the original scope formulated with the MMEL IG, so much so that one would say it is not what industry was expecting. He said he thought the intent of the FSIMS comment grid was supposed to encompass all reviews including FAA branches and AEG so that once the draft comment period is finished the content is set and there is no surprises.

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He gave examples as recent release or PL 73 where what was expected was not what was finally delivered.

Mark Lopez (A4A) spoke in support of Tom Atzert's position by stating he agreed that this new process has taken away a lot to the original value added of experience and knowledge of IG members, the real stakeholders. He then expressed as a former FAA representative that what FAA is doing is commendable; having kept the PLs and documents as such MMELs out of the DCB, Document Control Board, that FAA legal initially was pushing for.

Item remains OPEN (as a placeholder for FAA updating of IG).

93-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief

Discussion centered on fact that the Notice set up an uneven playing field as now there is ambiguity in the minds of many inspectors as to when swapping is appropriate, etc. It was asked if this past common practice of swapping parts that was in place before the issuance of Notice still is acceptable now that Notice has expired. Kevin Peters (FDX) gave example of this stating FedEx had been attempted to get a generalized procedure approved in their GMM but it was rejected in part due to issuance of the Notice, now that Notice is expired FAA still will not accept practice be placed in their GMM.

Bob Davis (AFS 240) provided background of intent of Notices, outlining that a Notice as a temporary guidance document that has a definite expiration date and should not have been used to issue a policy change. He stated policy actions should be incorporated directly into 8900. He said previously there was a temporary revision vehicle to update 8900 called H-BAT's which has been done away and with replaced with the Notice, but unlike H-BATs came with a one year life span. So he said guidance that was intended to be permanent should be developed and published directly into 8900, but it appears that in this case. For expediency, a Notice was used just like a H-BAT was previously used but the follow thru to incorporate the Notice action into 8900 was not done, thus a gray area has been set in place.

Tom Atzert (UAL) explained how the Notice as originally issued contained poorly written guidance that he characterized as unusable. After Notice was issued the MMELIG workgroup was formed but before they finished their work the Notice expired and now he is concerned that without cooperation and coordination with AFS 330 that the original content of the Notice and not the 8900 draft document workgroup has developed, would find it way in 8900.

Tom Helman opened up stating that revision to 8900 was in process and it was taking into account the agreed to wording developed by the IG workgroup. Mark Lopez (A4A) quizzed Tom on status of process but was unable to get an assurance of how far along FAA review had progressed. Mark thus stated that since the act of incorporation into 8900 has at least being confirmed operators can continue to react as if Notice is still valid? At this point, Tom Atzert objected to that statement as he said the guidance of Notice is wrong as it requires permission to swap parts be published in MEL which is what IG workgroup draft had corrected to within the maintenance program.

Item remains OPEN.

(Refer to agenda 93-34: Review Workgroup Assignments).

93-07 Reserved

93-08. PL-98, Navigation Databases

Greg Janosik (AFS 240) stated he has forwarded a decision paper to his upper management recommending PL 98 be rescinded because as it is not in line with CFR 14 121.628, and in his words, out the regulatory box. He is awaiting a decision from his upper management on his recommendation. Until he gets their feedback he intends to withhold any revision of this PL. Instead of PL he said he is recommending that FAA put out guidance on how to operate without a current data base into an Opspec.

Collyer Burbach (Cessna, on Webex) chimed in stating FAA needs to have a parallel plan in place for Part 91 operators who do not operate under Opspec authority. Greg countered that comment citing Part 91 regs and stating per his interpretation it isn't an issue for Part 91. Collyer challenged Greg position but then Todd Schooler (Cessna) presented a Special Airworthiness Info Bulletin, CE 14-14, stating it presented the FAA position that operating without a current nav database does not present an unsafe condition. A degree of confusion was introduced.

John McCormick (FDX) stated he was opposed to this action of rescinding this PL as it ignores the process that has been ironed out and tested as a sound means of assuring safety. He outlined how he felt the current FAA position as expressed by Greg was doing a disservice to the workgroup and industry at large. He stated that the IG workgroup, after years of effort, had presented FAA with a workable draft that offered a far better product than what we all are currently working under with the current PL and he did not understand Greg's position. He stated if they have problems with the IG current proposed draft then the correct approach is re-open with workgroup and not just kill the entire PL.

Bob Davis (AFS 200) spoke in defense of FAA outlining how the advent of GPS enabled procedures, RNAV, VNAV, etc., has made the procedures developed by the workgroup inadequate to verify the data due to the complexity of these new procedures. Bob stated rather than put out a PL that requires actions not all POIs or carriers can comprehend, or accomplish, that maybe FAA needs to build more extensive guidance via another vehicle as Greg is proposing. He concluded that therefore there is a lot of internal discussion within HDQ on best method to proceed.

Todd Schooler (Cessna) introduced a new wrinkle to this situation by stating how can air carriers handle this issue now that there are now manufacturers pulling support for their FMC databases? He referred a FMS vendor called Universal who has notified Cessna and apparently other carriers that they want to exit this line of business.

Tim Kane (Industry Chairman / Jet Blue) spoke up that while FAA may feel that while they need to address this issue via an Opspec there is still a need for an MMEL item to give operators relief, and that the IG draft is a vast improvement on the existing situation and it is ready to be deployed. Collyer Burbach (Cessna) spoke in support of John McCormick's position that current FAA position expressed by Greg Janosik ignores the net worth of the MMEL IG as John expressed. He expressed concern that as this issue has been drawn out, people are still using the current outdated PL guidance.

(Continued)

Tim brought forth an outline of a situation where a manufacturer was FAA directed to remove more restrictive relief they had in place on this subject. He explained how they were directed by e-mail to revert to the current PL standard version of relief, apparently based upon pending change via an Opspec. He stated that a process that thus far has worked so well via the MMEL IG has been stopped by this approach.

He stated FAA has been presented a workable PL draft but instead of working with it they are contending it needs to be moved to an opspec. Yet as a member of the opspec committee he reported that this item has not even registered on that group's agenda. Mark Lopez (A4A) stated A4A has come to the position that they believe an opspec approach is an unworkable solution.

At this point Dennis Landry (ALPA, on webex) spoke next in turn. He outlined how ALPA has written endorsements of the updated PL draft that IG workgroup developed as that they feel there is no reason to continue to insist that the current outdated PL be maintained. He said ALPA is ready to see the new revised PL process be immediately implemented.

Item remains OPEN.

93-09. AC 117-1 Crew Rest Facilities

Bob Ireland (A4A) asked if there was any interest in re-opening PL 130 (published 12/11/2013). He stated the reason is that it does not contain any instructions that would allow for use of temporary repairs. He gave example of use of speed tape to seal a tear in a curtain, even though such a process would restore the units regulatory functional it is expressly not allowed per wording of PL. Paul Nordstrom (Boeing) stated making a temporary repair returns an item back to operational status and hence there is no need to apply an MEL. Bob stated it none-the-less specifically states that no temporary repairs are permitted.

Tom Atzert (UAL) gave a lengthy rhetorical comment on the FAA handling of PL comment period and outlined of how operators were given no time to respond to this PL as almost immediately after it posted the rule became effective. He stated they had a general idea as to the content of PL from its draft form but they were surprised by the wording changes presented in PL final form when it was released. Tom described how United has on its long range aircraft qualified the aircraft's lie flat seats as class 3 CRF seats. He stated this gives them more flexibility when a CRF class 1 or 2 seats goes inoperative. He stated the PL does not account for the methodology of managing seats. He stated for this reason a revisit to PL is warranted.

Bob Taylor (US Airways) described a similar arrangement at his airline. He reported that per conversation between his flight ops department and the FAA PL Lead, Dale Roberts, they were informed that once a seat has been qualified as a CRF seat it becomes off limits for any MEL deferral. Furthermore he reported that in conversation with AFS 240 he has been told NEF is also not authorized to be used as a means of deferring a CRF seat.

Bob Davis (AFS 200) spoke of the inclusion of prohibition of temporary repairs into the PL. He explained how in earlier group discussions FAA received a slew of requests for a list of items /components that can deferred on a CRF seat, along with what he referred as unacceptable means of securing, repairing such items was suggested; thus FAA decided to limit what an operator can defer. He stated once a seat is designated as a CRF seat, any component or function of that seat that is required under the CRF AC list of required functions cannot be deferred. Yet after much discussion he conceded that the final draft was rushed out and therefore there is value to further discussions on improving the PL.

(Continued)

Mark Lopez (A4A) mentioned that the PL also contained specific statement that if repairs are made they must be done IAW Part 43.13. Mark stated that is not necessary true for large Part 135, 121 carriers use their maintenance program to perform temporary repairs. An industry member chimed in that large carriers ensure the intent of Part 43.13 is met by having an engineering department that assesses required repairs, etc. Thus the term IAW 43.13 addresses all concerned.

Bob Ireland requested to be maintained as the Lead for the PL. Bob then outlined the history of the how the CRF seats were designed, based upon Part 117 that is based upon AC 117-1, a document which originated with an old SAE specification. He stated this SAE standard had underpinned crew rest facilities requirements for over 20 years but was not backed any real scientific data.

He outlined how translation of this SAE spec into AC 117.1 led to the establishment of certain pass, fail criteria that some aircraft seats have failed to pass. He gave an example of a seat pad that failed the spec size requirement by a mere quarter of an inch. Therefore he reported a separate parallel sub-committee has been formed to revamp this SAE specification based the new FRM (fatigue risk management) data recently collected. The plan is to hopefully to use this new data to update the SAE spec which in turn be used to further justify the updating of the AC and lead to adjustment of the inspection criteria thus avoiding costly re-design, replacement of equipment that currently only marginally fails.

Decision was made to keep the workgroup convened and re-visit PL130. John McCormick (FDX) asked to be added to the workgroup roster.

Item remains OPEN.

(Refer to agenda 93-34: Review Workgroup Assignments).

93-11. PL-63 Equipment Required for Emergency Procedures

Eric Lesage (Airbus) stated that he felt the PL draft was ready for presentation to FAA. He outlined the latest draft changes and justification of a few points that he was requested to further evaluate, justify. He stated this was accomplished by a series of workgroup webex calls. He stated they had to come to consensus on several things like:

- That different OEM flight manuals may vary in means of catering to items of equipment being inoperative
- Whether or not an FOEB evaluation had to be conducted
- How to substantiate the relief, with analytical analysis or demonstration

He stated the agreement was to address all this in the draft PL Policy statement with examples. He specifically called out the APU as an alternate piece of equipment that may be required to be operative thus allowing for another piece of required equipment listed in an emergency procedure to be inoperative. Gene Hartman (FAA AEG LGB) questioned this stating they cannot require the APU to be operative in an emergency procedure. He stated he believed the proper way was to refer to APU as, if available.

Todd Schooler (Cessna) countered stating they have indeed called out the APU as an item in some of their procedures. He then qualified that statement with provided it is not already deferred. Gene responded with using the APU is a poor example of what Eric was trying to convey as the APU is really optional. John McCormick (FDX) concurred by citing another example and stating in the end it all depends upon how it is worded such as 'may be used, if available'.

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Todd again objected stating there is no regulatory requirement, CFR wise, on OEM flight manual development of an emergency procedure that dictates what is to be placed within a procedure. It is left to the OEM to determine. He referred to speed brakes, as was drafted in PL policy statement as another example that they require in an emergency procedure, yet by specific evaluation they have been able to allow the system MMEL relief.

Discussion moved to whether or not OEMs can amend emergency procedures and if that is in conflict with current FAA guidance such as preamble, etc. Tim Kane (Industry Chairman / Jet Blue) stated he felt this all was a re-hash of same arguments from previous IG meetings. Todd and Gene continued to agree not to agree. Eric suggested that the PL draft be posted for comment but Gene Hartman stated he felt first efforts should be re-directed to answering the question of if something is required by an emergency procedure can it be allowed to be deferred itself. He stated pushing ahead with current PL as contradictory to current FAA MMEL / AEG guidance.

Gene was asked specifically to identify what within PL draft he felt was wrong and he pointed to the APU. Yet after re-reading policy draft he conceded it did not specify state that APU was actually required as he first believed. He was asked by Tim if he could accept the placement of words 'if available' after the APU.

Discussion again when back and forth between what an OEM has authority to do and what is written in FAA guidance. Finally Gene asked the question as what equipment PL was attempting to grant relief too. He stated if it is equipment spelt out in AFM then if so there is no way AEG via FOEB's change an AFM and certainly the AEGs will not apply a PL that is attempting to do.

Tim called the discussion closed and requested Eric re-work the draft and coordinate with Gene.

Tom Atzert (UAL) spoke up stating there was some degree of urgency developing as Airbus is construing the current PL 63 language as prohibiting APU relief on their A350 product as they are requiring APU per AFM procedure. PL is to be revised and submitted to FAA to posting.

Item remains OPEN.

(Refer to agenda 93-34: Review Workgroup Assignments).

93-12: PL 73 MMEL Relief for Emergency Medical Equipment

Bob Ireland stated (A4A) plans to submit a petition of rulemaking to change CFR 121, Appendix A to change, rationalize kit contents, or content quantities in such a way to allow for lack in supply availability of drugs such as recently experienced with atropine and dextrose. He stated an upcoming possible national shortage of epinephrine is also possible.

He stated that just a week before the atropine exemption was due to expire, FAA had signed off on extension to the exemption to not carrying atropine for another year. He stated a recent petition for extension for dextrose has been submitted but its approval is still pending.

Bob stated that per the terms of the exemption the exemption letter must carried onboard and flight crew has to brief it. He stated while different carriers have different procedures, for some that has been to place a copy of letter within the kit. He reported that the new exemption now requires them to be carried onboard somewhere but not in the kits.

(Continued)

He stated with the latest exemption request for dextrose he is requested FAA consider approving them be placed in the kit at time of kit is packed as both the kit shelf life and exemption time frame of one year would expire at same time.

Item remains OPEN.

93-13: PL-40 ETOPS

Eric Lesage (Airbus) stated his PL draft is in hands of Seattle AEG and the last exchange he had with Greg Janosik (AFS 240) was to clarify that this PL draft was for the benefit of two specific Airbus models, the A330 and 350. He stated he understood that was one of criteria Airbus was required to show, that this change affected more than a single product.

Greg Janosik stated AEG review is complete but he outlined how the draft as was initially briefed it involved a fuel pump configuration on a single aircraft, the A350. He stated FAA does not issue a PL in such cases and he stated Airbus needs to approach relief thru the AEG. Eric stated it is not just an A350 issue but also A330 too. Greg stated there is no technical issues with what was proposed but it still is an AEG issue as Seattle AEG handles all Airbus,' thus he has taken no action to update PL 40.

Bob Davis seconded Greg position stating Airbus has a design difference that really needs to be evaluated by ACO and then AEG and since it is an ETOPS issue it also needs to run by AFS 220 who oversees policy for ETOPS. He restated Greg's position that the purpose of issuing a PL is to standardize MMEL relief when a difference in relief for like items evolves but not to grant relief.

Item CLOSED,

93-14: PL-79 Passenger Seat Relief

Todd Schooler (Cessna) opened the discussion by outlining how the previous PL draft had a sub-item, labelled seat controls. He stated this latest draft he was presenting had been expanded upon to include a parenthetical listing of seat functions this sub-item could to be applied to. He stated he had been approached with an inquiry from Kevin Peters (FDX) as to whether or not this listing and application of this sub-item could be expanded to include the seat foot rest. Todd deferred to Kevin to explain the request.

Kevin stated he was attempting to investigate if this approach was feasible. He explained that FedEx has had a particular problem with the footrest on one particular fleet in their system. He had an overhead presented that showed the failure of the footrest to retract as predominate failure mode of the seat. He stated this failure typically resulted in mechanics resorting to deferring the entire seat as it, the seat, and it functions, recline and armrest, are listed in MMEL. He stated the rational has been since the seat is MEL actionable then they must defer the seat, next higher assembly, which requires it be blocked from use.

Kevin stated for a long range fleet blocking of seat(s) becomes a problem yet he conceded this is more an economic issue than a safety issue.

(Continued)

He stated that that he had approached Boeing asking for consideration of a proposal to place the footrest into MMEL as a deferrable seat sub-item provided it is retracted or removed. He said the response was it should be deferred under NEF. Paul Nordstrom (Boeing) asked what how do business class carriers handle this.

Tom Atzert (UAL) stated he essentially agreed with Kevin's concern as he explained how this item is a high visibility passenger item and thus usually repaired rather quickly. He stated he would be OK with it being elevated to an MMEL included item. In fact he stated they do place these in their MEL but this has been challenged by an FAA inspector who stated they cannot place a NEF item into MEL. Tom next referred to an NEF program flow chart note that states essentially that a sub component of an MMEL item cannot be placed on NEF. Tom stated he was aware that this was a gray area, not clearly defined as for example a seat fold down food tray is universally accepted as an NEF.

Paul countered Tom's position stating the industry has successfully navigated around this issue for the past twenty, thirty years without needing to elevate this to MMEL level. Group discussion next centered on other newer seat design features such as 100% layback seats and those that can swivel. Bob Davis (AFS 200) referred to the NEF guidance that states NEF must not be used on item that presents a hazard or obstructs an egress pathway. Paul responded that this is the first he has heard of issue to foot rest being stuck in full extend position. He stated FAA would never allow for this deferral as it seat must be capable of being in the upright position for takeoff and landing. Tim Kane stated the PL draft proviso was for it to retracted or removed.

Tim asked if this PL draft addition was in the draft proposal already submitted to AFS 240 and currently undergoing its FAA internal review. Todd responded it was new. Tim stated that we cannot change, add to a PL draft after it has entered FAA internal review. Paul questioned the need for the parenthetical statement that had been added, stating that just the new sub-item 'seat controls' should be adequate to address FedEx's situation without this parenthetical embellishment. The group decision was that current draft should being left as is under internal review.

Bob Davis stated internal comments are almost in hand and PL is moving towards final.

Item remains OPEN (for monitoring purposes only).

93-15: PL-106 HF Radio Communications MMEL Requirements

Bob Davis (AFS 240) stated comments on draft are available on FSIMS draft site and PL final version is undergoing internal FAA coordination pending re-posting on FSIMS as final PL. Several members of industry expressed concern that they were not able to see the final draft before it goes final. Bob response was that FAA has no requirement to present a copy of a final before it becomes final. He stated they have made the comment grid sheet available and industry can review the FAA responses to the industry comments and that by reading the FAA concur, or non-concur statements be able to decipher the direction of change that may be presented within the final PL release. In the case of PL 106, he stated it has been coordinated with the PARC (Performance base Aeronautical Rulemaking Committee), AFS 400 (navigation / communications), 300 (maintenance) and 200 (ops) branches and all have seen the industry posted comments.

(Continued)

Tim Kane (Industry Chairman / Jet Blue) stated therefore there will be no way of knowing what is coming. Bob stated this is the same methodology now being used on MMELs, and FSB's. Dave Stewart (on Webex) spoke up stating in the case of PL 106 industry was even denied opportunity to review the FAA responses to industry comments because FAA withheld re-posting the comment sheet until just before this IG meeting. Dave stated it was only made available because he personally called Greg Janosik (AFS 240) and specifically requested FAA to repost it. He stated from his experience working on this policy he projects industry should brace for much more restrictive relief to be released in this heavily modified PL

Paul Nordstrom (Boeing) stated he thought that under the new process, FAA was to re-post the comment sheet to FSIMS allowing for industry to have an opportunity to review FAA concur, or non-concurrence and possibly input further comment. Tim stated this was the bone of contention that was expressed by Tom Atzert also. Bob Davis chimed in that the FAA with the new process was attempting to set up an audit trail of inputs and responses, decisions and by-ins, etc., that he said is the purpose of using the comment sheet and comment grid. He also said the intent is not to have a never ending drawn out process. Dave Stewart chimed that was the way FAA works, extending and drawing it out when it suits them and prematurely cutting it off when it don't. Dave said that it is their game then industry will play their game, but it is the constant changing of the game rules that is upsetting. Several members objected to his comment.

Paul Nordstrom stated in the case of PL 106 it has been hijacked and it not something industry was asking for. Tim Kane supported this comment. Tim attempted to re-direct conversation by summarizing how new process is to work and stating if a change occurs in final release of PL and someone in industry feels it is wrong, of needing clarification, etc., then they need to re-open the issue by posting a new IG agenda item.

Paul stated he felt the IG is best at writing the MMEL provisos and remarks in a consist, standard and concise format, whereas these specialized groups with the FAA have tendency to get too technical and use language that is too specific and thus inflexible, limiting application. He stated just as there is more than one way to fly the airplane, there should be more flexibility in PL too. MMEL should tell them what must be done and not so much how they must do it.

Item remains OPEN.
(Refer to agenda 93-34: Review Workgroup Assignments).

93-16: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)

The Lead, John McCormick (FDX,) requested to have this item tabled until next meeting.

Item remains OPEN.
(Refer to agenda 93-34: Review Workgroup Assignments).

93-17: MMEL relief for Emergency Escape Path Marking Systems

The Lead, Dave Burk (AeroDocs), was not present and has requested item be tabled until next meeting.

Item remains OPEN.

93-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)

Bob Davis (AFS 200) stated that the 8900, Volume 4 / Chapter 4 re-write is out of Greg Janosik (AFS 240) hands and being moved on to his desk.

Bob gave some background to explain away the delay in moving this project forward. He stated it got hijacked and drawn in a larger re-design project that lead to its content having to be re-formatted, etc. Then this other project got axed and they had to re-convert back to original format. He concluded with comment he has a target date of April, 2014, to complete his departmental review.

Item remains OPEN.

93-19: Reserved

93-20 PL 72 Wing Illumination Lights

Tim Kane (Industry Chairman / Jet Blue) asked where does this draft PL sit and Bob Davis (AFS 200) stated it is in hands of AEGs. George Ceffalo (AFS 240) stated it is being debated within both Seattle and Kansas City AEG offices and there is a disagreement between them; a failure to resolve it, or reach a final position.

Carlos Carriero (Transport Canada) stated this PL draft resulted from a comment of a Seattle AEG member, at MMEL IG meeting #87, conducted in Seattle, who claimed the PL language and classification of configurations, conflicted with various ADs. Tim concurred and identified the AEG representative as Mr. Gary Larsen who was appointed Lead for this PL, but thus far has not done anything. Carlos stated Gary made the comment, had a PL draft prepared and he bypassed the IG, submitted it directly to FAA AFS 240, who then posted it for comment. Now he has failed to follow thru and has been since unreachable.

Carlos reported he has searched for the ADs which were not clearly identified in PL thus he has not been able to establish if they actually conflict with existing PL 72 relief or not. Carlos recommended if Gary Larsen does not come forth and help substantiate his position, complete his Lead obligation then the IG should close this agenda item

(Continued)

Todd Schooler (Cessna) stated that several of the ADs Gary had cited were on Cessna models and he conducted a teleconference with him on subject. He found the subject ADs still existed but affected older generation products that as far as Cessna knows are no longer in operation and furthermore, they have already revised, updated their MMEL relief to address the concerns ADs covered. He stated Gary's PL draft changes was attempting to fix deficiencies already addressed and if incorporated would actually be a move backward, actually introducing a safety issue. Cessna thus declined to accept Gary's position.

Discussion was held on what exactly is the point of contention that Gary raised. No one had copy of, or knowledge of concern. Gene Hartman (FAA AEG LGB) stated that he had joined a few teleconferences involving Gary Larsen and an AEG solution was proposed but Gary rejected it. Gene reported if Gary has not come forth since then he supports IG closing the agenda.

Tim asked if anybody had or knew of the version number of this PL draft. Greg Janosik (AFS 240) stated it was a draft 5 dated April 9, 2013. He stated that when there is an issue open with AEG he does not tell them what to do. Yet he reports since the there is no issue with current PL with either the AEG and with industry, hence there are no planned changes in place. He concurred with closing this agenda item

Item CLOSED.

93-21: PL 105 Automatic Dependent Surveillance-Broadcast System

Lead, Paul Nordstrom (Boeing) stated he felt he had addressed workgroup fix to PL 105 with draft R2_D2. He said it was forwarded back to FAA last July and he does not know its status as of today. Greg Janosik (AFS 260, on webex) spoke up stating this was because Paul had failed to do what was requested. He had placed the extended squitter in PL 105 but had not taken any action to remove it from current Transponder PL 76. Greg reminded Paul that he had previously outlined that he would not allow same information to be listed in more than one place.

Paul stated he also included in PL 105, along with extended squitter, the GA equivalent version known as UAT. Tim Kane (Industry Chairman / Jet Blue) asked if PL 105 as drafted was ready to go. Paul indicated yes, and that he can draft a revision to PL 76 to remove the extended squitter function. Bob Davis (AFS 200) spoke stating that there was a mismatch. He stated UAT was in fact a transponder function while PL 105 was intended to address strictly ADS-B functionality and thus did not belong in 105. He outlined the differences. Paul countered that PL 76 never did talk to a UAT as it only came about as outgrowth of ADS-B.

Collyer Burbach (Cessna, on webex) interjected another wrinkle by stating the extended squitter function output thru the transponder serves more programs, functions, that just ADS-B. He listed EU mandated ELS/ EHS as an example. He stated it is a function of transponder just as UAT is and his vote is to place the UAT within the transponder PL. He commended Paul's layout of PL 105 as it clearly spoke to ADS functionality more so than the equipment needed to make it work. He continued with comment *if* it is the intent to address all the equipment that enables ADS-B then PL would become much more extensive in scope and list such items as FMS, ADCs, etc.

John McCormick (FDX) asked question 'is ADS-B not just a sub-function of the transponder.' He stated PL 105 was originally created by UPS to address their propriety system but then morphed in a larger ADS-B project. He asked why not combine all this in one transponder PL with all function and sub-functions outlined. This comment received several endorsements.

(Continued)

Bob Davis (AFS 240) stated there is already a regulatory requirement to have an ADS-B transponder by 2020 in US and certain airspace around the world that requires it now.

While TCAS is regulatory in some areas but not in others. To do as suggested would require putting TCAS into the transponder PL and that clouds the issue. He described the difference between UPS' original PL and current draft stating their PL described certain functionality of ADS-B, supported by particular items of equipment.

Whereas he described the new 105 as covering only enhanced functionality. Much confusion was expressed on direction PLs are and should take.

Tim brought the discussion back original position; 105 as ready to go and a revision to remove from 76 the current listing of extended squitter is needed. Paul agreed and then Greg agreed.

Item remains OPEN.

(Refer to agenda 93-34: Review Workgroup Assignments).

93-22: PL-86R6-D1 Policy Regarding Compliance with Master Minimum Equipment List (MMEL) Revisions

Greg Janosik (AFS 240) spoke on behalf of the Lead stating this PL proposal to give 90 days, versus 30 days, for Part 91 operators to have to submit more restrictive MMEL changes. Greg stated has talked with AFS 800 and they are agreeable to getting this change made as an editorial change to policy. Meanwhile Greg assures that the 8900 re-write will list only the 90 days too. Item is now in Greg's hands.

Tim Kane (Industry Chairman / Jet Blue) stated that although the 90 days is the current guidance some FAA CMO's are holding their operators to a stricter standard, 60 days. He introduced the new IG Member Linda Chism (Alaska Airlines), who outlined how even though the PL Policy statement gives an operator 90 days the revision highlight for rev 3 of PL states:

'Revision 3 clarifies the intent that the 60-day compliance time applies to 14 CFR Part 91 Subpart K, 121, 125 and 135 operator MELs.'

Linda stated while this highlight clearly was intended to address the change from 60 to 90 days, it does not state that in direct terms. Linda asked what is stated in 8900. Bob Davis (AFS 200) stated just 90 days. Bob stated the inspector must follow 8900 and not so much a PL as PL does not change 8900 unless PL has been incorporated. He stated if they are imposing a 60 day on the operator they better be doing the same to themselves in their review and approve.

Questions on why are they referring to clearly a history of change and not the current data, 8900 and PL 86 Policy statement was discussed. Bob finished the discussion by directing Linda to ask her inspector to review 8900, or call him.

Item remains OPEN. (For monitoring purposes)

93-23: Reserved

93-24: PL-119 Two-Section MMELs

Bob Davis (AFS 200) stated the Bombardier's request to have a two part MMEL made available to Part 121 has been rejected by AFS-1. He gave explanation that under Part 121 the operational control of aircraft is shared between dispatch and pilot in command (PIC). Whereas PL 119 was granted to Part 91, 135 who typically don't have that level of operational control and hence do not have these resources available to aid PIC in decision making, etc.

Dan Leduc (Bombardier) stated they were confused at the FAA letter response that they would use this to circumvent existing practices as coordinating with dispatch or maintenance. Jim Boothe (Republic Airlines) spoke in support of Bombardier's petition to have a two part MMEL for their C series. He said the intent is to have more oversight, more vetting of items. He stated just like how most major 121 carriers have a Pilot Deferrable MEL (PDM) process with the advances in newer aircraft systems and the CAS message system a crewmember can now dive more directly in the background of what is driving the CAS message. Plus with a two part MEL the manufacturer can aid the pilot even further by providing a list of CAS that are permissible for dispatch A list that has been extensive researched and vetted with FAA AEGs. He stressed it not the intent to therefore bypass dispatch or maintenance but to help expedite their decision making process.

Tim Kane (Industry Chairman / Jet Blue) stated what Bombardier needs to do is make a better case. He stated his airline, JetBlue, was to soon embark on MMEL project for Embraer 190 E2 and they were interested in using a two part MMEL too. Tim stated that Republic, Bombardier, and Embraer need to re-define their two part MMEL submission.

Dan outlined the essence of AFS 1 rejection as stating since 121 operators communicate with their dispatch and maintenance organizations, hence a two part MEL is not needed and that no 121 operator has requested one to date. Bob chimed in with his understanding that the FAA rejection as being final and there will be no re-consideration.

Discussion was had on how current two part MMEL programs are managed and the Jim (Republic) again described how a two part MEL in a 121 environment would move the PDM decision making process away from strictly local authority to the boarder review of the AEG before it being placed within the MMEL. He suggested a different approach could be to consider separating the issue from expansion under PL 119 to being a totally new PL that takes a different point of view. He said with advances in new aircraft design it makes sense that an CAS message driven MEL for large 121 ops be allowed. He described how the manufacturer would do a complete analysis of the message(s) and system impact and determine if it for safe dispatch, with or without maintenance involvement.

Todd Schooler (Cessna) cautioned on no maintenance involvement. He stated everybody is looking at this issue from a Part 91, 135 perspective that assumes that maintenance personnel are not available and thus if message is in MEL it can be strictly handled by the pilots. He gave examples how maintenance when available, can be used, etc. He agreed the proposal needs to be improved and pursued. Tim Kane chimed in stating even if those items that have no maintenance; are determined to be strictly an operational procedure only, are approved for inclusion into the MEL then much improved efficiency for 121 carriers could delivered.

Carlos Carriera (Transport Canada) gave his organization's perspective on the two part MMEL and it application stating it definitely has its purpose for both 91/135's and with the 121's. He respectfully disagreed with the FAA position stating their concern was misplaced as it is not just an operational control, communication issue. He also ventured out stating FAA already has approved this form of MMEL without acknowledging it as a two part MMEL. He said FAA MMELs already contain CAS message level relief.

(Continued)

Dean Hartschen (Beechcraft) stated the MMEL for the Hawker 4000 is totally built around CAS messages. He described the process and Tim requested if the aircraft operating system was Honeywell / Primus Epic? Dean stated yes. Tim stated thus all the aircraft that have so far been identified, Embraer, Bombardier, and Hawker have a common equipment standard with the Honeywell / Primus system thus the technology is in place that would support a two part MMEL.

Mark Lopez (A4A) requested Bob to garner support of the AEGs to help promote this request. He felt the upper management at FAA HDQ needs to be informed by their own SME's on the merits as expressed here at IG meeting. He asked AEGs for support. The Hawker representative stated their FOEB process was a lengthy multi week event and that the level of detail, all the system review, system safety analysis that had to be conducted for each CAS message was exhaustive. He stated the more this is built in the beginning of the aircraft design the better.

Mark re-directed the discussion to the AEG on hand stating the message is not getting delivered to HDQ and could they help out. George Ceffalo (AFS 240) stated that in last time this came up in an effort to evaluate efficacy of having a two part MMEL they requested survey data but only received 12 responses which is insufficient to make a quantifiable decision on. So he said they need better feedback from the users of these advanced aircraft. Tim Kane agreed that industry needs to make a better case with more data supporting and feedback on the technology

Gene Hartman (FAA AEG LGB) responded with a history recap on PL 119 development and spoke to the survey which they did that resulting little to no meaningful feedback which he took to mean it was working well and the CAS message MEL was thus a good workable tool. He thus stated he agreed industry need to just build a better case for a part 121 two part MEL.

Todd Schooler (Cessna) stated that CAS message orientated dispatch is how the state of art in avionics. He gave examples of how latest generation Cessna products automatically performs the necessary troubleshooting, accurately identifies the malfunctioning component / system, and even provides the crew the necessary maintenance page(s) etc., at the same time the CAS message is presented

Workgroup was suggested to research and revise the two part MMEL proposal for Part 121 operators. Workgroup members selected.

Item remains OPEN.
(Refer to agenda 93-3: Review Workgroup Assignments).

93-25: PL-9 Public Address System, Crewmember Interphone and Alerting Systems

Tim Kane (Industry Chairman / Jet Blue) stated PL 09 draft was submitted to FAA last July, was posted, eventually cleared the comment phase and has been taken off FSIMS. He asked for an update on status of where was in the internal review cycle.

Tim and Lead Paul Nordstrom (Boeing) re-hashed the scope of change as being a few minor editorial changes only and asked FAA for is current disposition. George Ceffalo (AFS 240) stated he was totally unaware its nature, scope, or whereabouts?

Action item is for FAA follow up.
Item remains OPEN.

93-26: PL-129 Cockpit Smoke Vision Systems

With John McCormick absent, Sam Kern (UPS) spoke to progress of their process of equipping their fleets with EVAS (SVCS). He said that in his opinion this PL was a perfect candidate for assignment of a GC header. Instead FAA chose to issue the PL without a GC and imposed the requirement that each fleet MMEL item include the associated STC number. Hence UPS installations are being held up as each fleet's MMEL revision are being worked at different paces.

He reports they just recently received the B-747-400 relief; had it already been placed in an earlier 767 MMEL rev under the vendor title of EVAS, not PL title of CSVS, and they were awaiting MD-11 MMEL, which is in delay and thus their latest concern. UPS considers getting safety related system installed as soon as possible a high priority. Meanwhile he reported the 757 MMEL has been released without any problems. He repeated that if FAA had assigned a GC header to this PL in the first place all this delay could have avoided.

Tim asked if the PL draft and MD-11 MMEL are assumed to both be undergoing internal FAA review. Sam stated as yet they had not submitted any new PL draft but he asked FAA for comment on delay of processing the MMEL.

Bob Davis stated when it involves an STC it comes under AEG authority and he has heard nothing regarding this from AEG.

Gene Hartman (AEG LGB) stated he does not see any posting and Sam stated that is part of their frustration. Gene said it should have been posted to FSIMS draft website for 30 days for comment and any comments entered on comment form then sent back to AEG chairman. AEG chairman should resolve any issues based upon comments received and then the document goes into FAA internal review.

Kevin Hughes (UPS) spoke up stating that is exactly what they are waiting on, it being posted for comment but nothing has happened. Meanwhile the AEG chairman has been telling them he is waiting for it to come back from internal FAA review first? Thus Sam reported it appears to be somewhere within the FAA but nobody knows where.

Next Sam stated that some of the delay on the MD-11 was due to AEG discovery that the vendor made an error in their STC AFM supplement by putting reference to system deployment within the emergency procedures section. He stated an amendment to the STC was required to move this to supplement's general section, but now the MMEL is in delay for other reasons.

Brian Lesko (ALPA) spoke up stating the union considers getting this safety related system onboard all aircraft is a high priority by the union too, He raised the question of who would be liable if an incident were to re-occur and it was found later that this safety enhancing system is being administratively delayed and hence was not used?

Kevin Peters (FDX) brought the discussion back to the issue at hand by doing a recap of the PL development, the resistance to assignment of a GC header, and the fact that the FAA insisted on each MMEL submission include the STC number that installed the equipment. Tim stated this was done as FAA wanted as generic PL as possible as if multiple vendors would be providing the equipment and thus differences in design, procedures, etc., would exist. But it was well known at the onset this was not the case.

(Continued)

Paul Nordstrom (Boeing) reflected on this is the exact reasons the manufacturers had previously pushed for MMEL authority that was labelled ODA. He described how FAA was reluctant to give that to them with argument that if something really needed to urgently be released it will be done. He described how until recently that was possible but now the FAA has built this overly burdensome process that now takes 5-6 weeks into months to do anything and safety issues like this are made to languish.

The FAA insistence on this PL requiring STC number in MMEL brought forth, identified, that a significant degree of confusion existed on the correct way to submit for MMEL relief associated STC installed equipment. Gene Hartman stated this was the reason he insisted FAA HDQ reactivate PL 109. A brief discussion was held on any differences between the fleets as to design, installation, and procedures. The answer was that only difference is a slight difference in mounted location, otherwise the equipment is the same and it not required per any procedure.

Tim stressed it is not an essential piece of flight equipment. Tim stated the action item here is UPS needs an update MD-11 MMEL and IG needs on the PL.

Item remains OPEN.

93-27: PL-029 R6D1 Master Minimum Equipment List (MMEL) Requirements for Cockpit Voice Recorder (CVR)

Collyer Burbach (Cessna) stated this PL draft has already passed thru comment grid review is currently in FAA HDQ internal review and is expected to go final soon.

Item Closed. (Pending Release)

93-28: PL-054 R11D1 Terrain Awareness and Warning System (TAWS)

Collyer Burbach (Cessna) stated this PL draft has already passed thru comment grid review is currently in FAA HDQ internal review and is expected to go final soon. He reported that there was a duplication of the reactive windshear system on this letter which is also addressed in PL 67; therefore they removed it from this letter (refer to previous minutes of IG 91 for further details).

Item Closed. (Pending Release)

93-29: Reserved

93-30: PL-XXR0-DO CNS Control Panels

Collyer Burbach (Cessna) stated that at last meeting he had proposed that IG close this agenda item as there is just too much variation between products but he requested item be retained until his co-lead Kevin Peters was present. Kevin spoke up stating he too concurred.
Item Closed.

93-33: New Business Requests

New Business Item A: Request to discuss PL 25, Master Definition #30: (M)

Dennis Landry ALPA - Request to discuss PL 25, Master Definition #30: (M)

This symbol indicates a requirement for a specific maintenance procedure which must be accomplished prior to operation with the listed item inoperative.

Normally, these procedures are accomplished by maintenance personnel; however, other personnel may be qualified and authorized to perform certain functions. Procedures requiring specialized knowledge or skill, or requiring the use of tools or test equipment, should be accomplished by maintenance personnel. The satisfactory accomplishment of all maintenance procedures, regardless of who performs them, is the responsibility of the aircraft operator. Appropriate procedures are required to be produced as part of the aircraft operator's manual or MEL.

Dennis Landry (ALPA) stated he felt that in regards to the MELs we have reached a point where some (O) procedures really need to be handled by maintenance rather than pilots. He stated the pilots are no longer trained to have in depth functional system knowledge and some procedures are just too complex to be successfully completed strictly with crew knowledge.

His example was from an operator's 757 MEL, 73-21-01-A, that has an extensive flow diagram that is listed as a pilot placard item yet also contains a Warning that states if procedure is not conducted exactly as listed, an inflight engine shutdown will occur. The procedure really needs more than general knowledge but instead requires a high level of detailed system understanding. Dennis pointed to the MMEL definition #30 that includes statement:

"Procedures requiring specialized knowledge or skill, or requiring the use of tools or test equipment, should be accomplished by maintenance personnel."

Dennis continued with statement that procedures such as is 73-21-01-A example sets the pilots up for failure. Mark Lopez (A4A) stated he was personally involved in the development of the example procedure and he questioned Dennis contention that it was something a proficient line pilot could not handle.

Group reviewed the 73-21-01-A procedure which requiring deciphering discrete maintenance message tags while reading a flowchart was rejected by majority of IG present as something reasonable to expect flight crews to do. Mark conceded it is a challenging MEL. He also acknowledged it is not an easy tasking for the maintenance personnel either, but he stressed the Captain has the authority to stop and refuse.

Dennis countered with ALPA stands behind captains authority but not all pilots have the same level skill and it well known they come under pressure to move the aircraft. Another member of IG spoke stating that the level of maintenance required per this procedure goes well beyond the guidelines of what is an appropriate Pilot Deferrable MEL (PDM). Discussion was had on whether this is appropriately assigned.

(Continued)

Tim Kane (Industry Chairman / Jet Blue) stated he could not get his company to allow him to publish this and then reported that this issue is a just that, a company level issue. He then questioned what Dennis thought bringing this to IG's attention would do? Tim repeated that is as a company issue and the correct channel to resolve such an issue is with communication with the Company Chief Pilot, Fleet Captain, etc., and not with this IG, or for that matter the AEGs. Dennis said he brought this example forth as just that an example. He said this example was from his airline and there was not a problem at his airline but as a national ALPA safety representative he is routinely presented with similar problems from members who don't have large organization structure like his and he was seeking some direction to aid how he advises pilots who report similar situations, Jim Boothe (Republic) stated he would advise them to submit an ASAP report and elevate it that way as the FAA has to get involved and give a decision on their position.

Tim re-stressed to Dennis that these type issues should first be addressed at the operator level as it a local issue. Dennis returned with comment that he still felt PL 25 master definition of (M) could be improved upon and asked does everyone today know what is meant by phrase '...requiring specialized knowledge or skill...' The discussion next centered upon levels of actions different operators assign to flight crews, etc. Bob Davis (AFS 200) closed this discussion with comment that whatever tasking an operator assigns to the pilot the operator needs to ensure the pilots are qualified to do the procedure by training it, placing it in a ground school program.

With this answer Dennis closed by thanking the IG for the discussion and saying he will use Bob's answer in future cases. That is when a pilot reports to ALPA a similar situation the first thing he will seek out is evidence pilot was properly trained.

Item CLOSED. No action needed by IG.

New Business Item B: A4A MEL Survey

Mark Lopez (A4A) stated they were approached by a single carrier to produce a survey of how many MELs are being carried on a daily basis in a simple ratio based upon fleet size, number of MEL category, A, B and C daily deferrals carried. He reported this is been requested to collect of a one week period. Dave Stewart spoke up asking why does this operator need this? Mark reported just a metric to compare how their operation is performing compared to an industry standard.

Mark stated A4A plans to provide survey to all A4A members requesting they compile the necessary data / numbers and give feed back to A4A. A4A will sanitize the background information so no one can identify who submitted the data.

Item to remain OPEN (for tracking /reporting progress).

(Continued)

New Business Item C: PL 104 Storage Bins/Cabin, Galley and Lavatory Storage Compartments/Closets

Todd Schooler (Cessna) opened discussion on PL 104. He stated we all have been using this PL as written that storage bins, closets, etc., can be deferred provided they have their doors removed. He stated at a recent Cessna FOEB Todd had his interior structure engineer present and when it came to operating under the terms of PL 104 and removing a door he was informed that Cessna cannot do that, remove the door(s), because the presence of the door is what they use to demonstrate certification compliance for safety and security.

Todd canvassed other GA, 91, 135 manufacturers and found they all used similar practice but he discovered that the larger transport category manufacturers use the equipment mounting brackets and devices to show security. Thus he reports that PL 104 is now not providing a level playing field for all. He asked the group for suggestions on how to best fix this.

Tim Kane (Industry Chairman / Jet Blue) asked if he was proposing sub-dividing the PL into groups with different relief per operating Part, 91, 135 and 121, etc. Todd responded it was not an operating Part issue but a certification of Part 23, 25 and the different types of airplanes built under Part 25. He explained that there is a lot of Part 25 certification issues based upon size, weight and seating that Cessna does not have meet hence differences in types. He asked if this PL could be revised to be general information type PL rather than offering specific examples of relief?

The group questioned Todd on how they secure a component normally stored in a bin or cabinet without the door and response they cannot and that Todd said is the rub, the relief is now unevenly applied. A recommendation that all PL needs is a Note that states 'any door that is used to secure an item to meet certification cannot be removed.' Todd asked if it should be in PL Policy statement of with

relief listed in PL. Tim agreed to join Todd within a workgroup to discuss further, but he stressed it really requires a manufacturer group discussion.

New Business Item D: PL 24, Lavatory Fire Protection

Darrel Sheets (Net Jets) presented a concern with PL 24, stating he is trying to more broadly capture Part 25 with inclusion of further requirement of CFR 14.25.854, Fire protection on aircraft with 20 passenger seats or more. He stated that executive jets are typically 19 or less seats and hence current PL is not applicable to them. He then presented a draft 5 to PL 24 that requested be placed on the next meet, IG 94 agenda.
New Agenda Item OPENED.

New Business Item E: Closed

N/A, problem resolved prior to IG meeting. No action needed.

(Continued)

New Business Item F: Discussion on PL 25, Master Definition # 19. Inoperative Components of an Inoperative System.

SWA brought issue forward on what is permissible per MMEL Definition 19 as he reports their CMO is claiming that if a piece of equipment / component is missing from the aircraft that is associated with an MEL item, and that MEL's provisos do not specially state that the piece of equipment / component can be missing then that MEL is not usable. He gave example of a seat missing a seat belt, the seat itself is carried in the MMEL but nowhere in its provisos does it list that the belt can be missing and thus their CMO has ruled that they cannot defer the seat due to a missing belt. He stated nowhere in the FAA MMEL policy / documentation is there guidance on the subject of missing components, other than the occasional proviso that states something can be missing.

Tim Kane (Industry Chairman / Jet Blue) stated he understood how sometimes an item such as a seat belt or seat cushion have to be removed due to contamination, etc., and therefore the need to defer the seat assembly is required. Tim then asked the group if they had concerns, problems with Southwest's proposal.

Todd Schooler (Cessna) stated he did from a manufacturer's point of view. He said there could be a specific reason(s) why a component cannot be missing and thus he stated an operator needs to petition for it so any potential reason(s) can be made known to the operator, as it may not be readily apparent, etc. Todd then stated the example of the seat belt is not a good one as he felt it is warranted to be allowed and he stated the IG might need to revisit the seat PL and fix that. But he concluded with just allowing an operator to put any sub-component on an MEL without manufacturer consent was absolutely not OK.

Discussion was had on how these type things are typically handled and Tim summarized with the statement that in actually what happens in most cases the general accepted practice is if a sub-component is inoperative or missing then operator defers the higher assembly provided that higher assembly is provided relief in the MMEL. Todd reminded the IG of Note in current PL 79 that states a seat with an inoperative seat belt then the seat must be considered inoperative.

Paul Nordstrom (Boeing) stated if operator removes the belt via an appropriate approved vehicle such as an E.O. then that's OK. He was reminded that is not the problem, it is when component is just discovered as missing, that condition is not addressed in guidance. Tim stated that he would suggest a workgroup continue the discussion on subject. In support Collin Hancock (EASA) stated that in the EASA MMEL operational rules guidance it states an item of equipment can only be missing if it is specifically listed in the MMEL. Paul stated he agreed that this has been a gray area in FAA guidance.

New Agenda Item OPENED.

New Business Item G: Discussion on PL 59, Global Change

George Roberts (Delta) states they are attempting to clarify the language in current PL 59 as they have experienced a wide degree of interpretation from their CMO on it. He has prepared a draft and would welcome other operator's inputs. He was asked to give examples of these areas of interpretation. George listed the word verbatim in the GC header. It was questioned as to the nature of concern and George stated the fact that the GC header no longer contains the Policy statement inclusion of the phrase '... or equivalent terminology...'

Bob Davis (AFS 200) explained the history of change to the header and how the introduction of the phrase of equivalent terminology was introduced to account for various differences in design approach that OEMs may take to meet a particular certification requirement. He finished with the fact that he notes that the latest revision of PL it has been removed. George responded he would like to try to take a different approach in the wording.

Darrel Sheets (NetJets) referred to the GC header phrase 'applicable sample proviso' stressing this has enabled his organization some latitude, reason, with the FAA on applying the term verbatim other than quite literally as written. He gave example as to how not all PL sample provisos apply to every configuration. He stressed that George and his workgroup do not overlook it and thus remove it.

New Agenda Item OPENED.

New issues Item E, information:

1. MMEL three asterisk symbol:

Collyer Burbank (Cessna) raised issue with use of three asterisk symbol (MMEL master definition #26) in their OEM drafting of MMEL FOEB s proposals and draft PLs. An inspector challenged their use of the asterisk within the MMEL at the parent item level for the item , HF communications, as this is not standard equipment on their aircraft. It is only offered as optional equipment.

He stated the inspector was claiming that only a part of parent item's provisos group, the D/-/, that states '...in excess of those required by FAR, per his interpretation of PL 25 definition should have the asterisks assigned. He questioned the inspector logic and suggested a revision to clarify intent of definition.

Tim Kane (Industry Chairman / Jet Blue) stated if could formulate a proposal IG could better evaluate it. Collyer asked if he could be added to the workgroup for PL 25. Tim agreed to place him put on it.

(Continued)

2. What if there are errors in an approved MMEL revision.

Bob Taylor (USAir) outlined a situation where an MMEL revision was released with errors and he wanted to know if he as the operator has to place this erroneous information in their MEL revision. He gave example as A320 MMEL rev 24 that formatting issues along with a page missing, hence item missing, etc. He stated most of the operators wanted the MMEL rev rescinded, corrected, and re-released. He referred the PL 86 that when a master relief becomes more restrictive the operator must submit a local MEL rev to the CMO in 90 days, etc.

Bob Davis (AFS 200) stated this has happened a few times before and typically they do rescind, correct and re-release but it takes time and it depends from case to case on how FAA handles it. He said they can shorten time of various steps a rev must go thru such as by making the correct rev a letter change rev they reduce the overall time for comment and review afterwards but he stress that are a whole of 'hoops' that it must still pass thru.