

# MMEL IG 94 MEETING - MINUTES

April 23-24, 2014

Delta Airlines  
Atlanta, Georgia

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

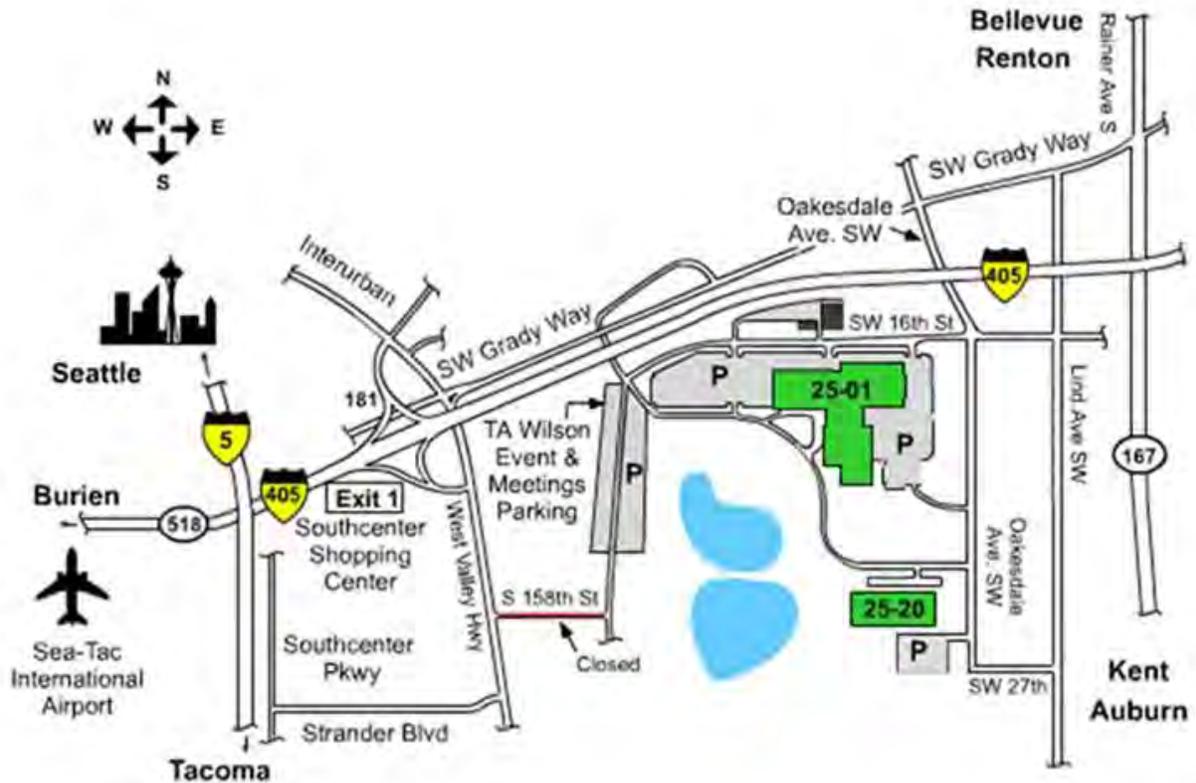
Meeting  
Secretary

## MMEL IG 95 Meeting

To all concerned,

Boeing is hosting MMEL IG Meeting 95 on 13 & 14 August at:

Boeing Training Center  
Boeing Building 25-01  
1301 SW 16th Street  
Renton, WA. 98055



There is parking spots reserved for customers West of the 25-01 along the covered walkway.

Everyone will need to register for badges. Please send to [FLOEDispatchRequirements@boeing.com](mailto:FLOEDispatchRequirements@boeing.com) the following information:

First and Last name:

Company:

Nationality:

A list of local hotels is attached. Sorry, but no Boeing transportation can be provided.

Regards,  
Paul

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**94-01a: Delta Airlines - Welcome Brief**

The Welcome Briefing was provided by George Roberts and the break schedule was reviewed.

**94-01b: Introduction / Administrative Remarks**

- a) Tim Kane (Industry Chairman / Jet Blue) opened discussion by outlining turnover scheduled for August meeting as detailed in IG 93 minutes.
  - INDUSTRY CHAIRMAN (Donn Reece assume responsibility at 3rd qtr. meeting 2014)
  - INDUSTRY VICE CHARIMAN (George Roberts assume responsibility at 3rd qtr. meeting 2014 his position is available for elections as of the 1st quarter 2015)
  - RECORDING SECRETARY (Kevin Peters volunteered to continue as the IG Recording Secretary his position is available for elections as of the 1st quarter 2015).
  - MEETING SECRETARY (Todd Schooler remains on as Meeting Secretary and his position is available for elections as of the 1st quarter 2015)
- b) There were no representatives from FAA HDQ Washington DC in attendance, with the exception of George Ceffalo (AFS 240), who on the web link.
- c) IG 94 was another blended Webinar and formal meeting with some 45-50 persons in attendance. Those who had attended the IG Meeting via Adobe Connect were marked as present.
- d) Courtesy protocols are in place for web connect use.
  - a) Phones must be muted when not speaking, and
  - b) Speakers on web connect must identify themselves in order to be included in the meeting minutes.

**94-02: MMEL IG/FOEB Calendar**

It was requested to get calendar posted on A4A or to Internet.

Mark Lopez (A4A) stated they are willing to host it on the A4A's member's portal within the MMEL IG Administrative folder: Link is as follows:

[http://memberportal.airlines.org/taskforces/engineering\\_maintenance/mmel/Documents/](http://memberportal.airlines.org/taskforces/engineering_maintenance/mmel/Documents/)

He stated this is a member's only site. However, anybody signed up for the MMEL IG access list will be allowed to view the calendar. Any inquiries to be directed to [mlopez@airlines.org](mailto:mlopez@airlines.org)

2014

Calendar was reviewed for the remainder of year:

3Qtr            IG 95:            Boeing            Renton, WA Training Center, 13-14 August.

4Qtr            IG 96:            SWA                Dallas, TX. Dates presented, 29-30 October

No FOEBs are on the calendar.

(Continued)

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### 2015:

1Qtr	IG 97	ALPA	Location and dates yet to be determined. Late January to early February were suggested but not Known...
2Qtr	IG 98	Textron Aviation	Wichita, KS, dates for an April meeting to be determined.
3Qtr	IG 99	FAA	location and dates to be determined
4Qtr	IG100	AAL	Dallas, TX, and dates to be determined

No FOEBs requested to be placed on calendar.

### 2016: OPEN, activity to be determined in the future

Tim Kane (Industry Chair / Jet Blue) reminded group that the host of last IG meeting, Embry Riddle Aeronautical University (ERAU), Daytona Beach, FL has expressed willingness to host future meetings.

Tim also spoke to recent polling on calendar schedule of 3 versus 4 meetings / year. He stated until schedule of meetings with host support already established is exhausted we will continue with 4 and then possibly moves to 3.

Mark Lopez (A4A) stated the Opspec Working Group (OSWG) made the move to 3 meetings and this has now been reduced even further to only two FAA attended meetings interspersed by two industry only meetings. He then informed the group that FAA HDQ had recently informing A4A that they intend to do likewise with the MMEL IG meeting. This is apparently an upper Headquarter directive to limit headquarter personnel to only travelling only twice / yr.

Mark stated he was planning to counter this with a proposal to FAA that they host one meeting / year in Washington, DC and thus enable 3 face to face meetings with FAA HDQ staff instead of only two. He thanked the AEG regional offices for their continued support and sending their representatives to the meetings.

### **94-03: MMEL Agenda Proposal & Coordination Process**

Tim Kane (Industry Chairman / Jet Blue) outlined that there was some progress to report on re-writing the document but that the document was not available as of this meeting. He thus opened discussion with some needed changes to Lead and FOEB assignments.

- Valentino Venier –Airbus, Requesting a Lead Airline for the A350. David Robinson- FAA AEG Chairman.
- Andrew Benich from American Eagle was announced as new Lead for the Embraer, ERJ 145.
- Mark Lopez (A4A) outlined how he had been contacted by representatives from Mitsubishi Aircraft company who wanted to be added to the MMEL IG group in support of their new aircraft, the Mitsubishi Regional Jet (MRJ).

**Workgroup (WG) Lead, Kevin Peters (FDX)**, outlined how after the last IG meeting he had arranged and conducted a teleconference with the other WG members to brainstorm how and what should be revised in the document. He stated the emphasis was upon revising what he referred to as the 'front matter' of the document. That being what is currently listed as chapters 1 thru 6.

An outline of prelim document was found and presented on overhead and Kevin highlighted the principal changes as:

- Change the listings of document chapters to be referred to as sections 1, 2, 3, etc.
- Expansion of the section 2, 'Background' by added more details, chronologic listing of history of the MMEL IG process.
- Establishing a new section 3 labeled called 'Scope.' The current old chapter 3 becoming section 4 that addresses the Industry Lead Airline concept.
- A more substantial change was re-identifying the 'Industry Lead' in the current Lead Airline Concept to the title of 'Industry Focal.'

At this point he stated that was as far as he was able to go with draft document prior this meeting. He listed off the other WG decisions yet to be acted up upon, principally how to revise and combine the current chapters 4 and 5, Formal and Electronic FOEB process, into a single generic FOEB process and finally the intent of deleting the current chapter 6 as the feedback process it addresses has long been discontinued.

Next, Kevin outlined changes planned for the Appendix A, elimination of Lead Airline contacts as it was recognized these are constantly out of date and will remain so. Finally he spoke to his intent to get rid of what he referred to as a very non-MMEL styled MMEL proposal format and the MMEL template. Kevin explained that it did not represent any MMEL template used by FAA and he seeks to replace it with a more representative sample MMEL.

General group discussion was had on this later point and Dave Burk (AeroDox) conceded the current template was a 'trail balloon' that he once pitched, never intended to see it get used but it was placed in document anyway. He agreed it needs to be replaced. WG to continue with their work on advancing document to a finished state and report again next meeting.

Item remains OPEN.

### **94-04A: Policy Letters Issued in Calendar year**

Tim Kane (Industry Chairman / Jet Blue) requested update from George Ceffalo (AFS 240, on Webex) who reported no update to give as no PLs have been issued so far this year. Tim Kane outlined how there were currently 4 PLs posted on the FSIMS draft site for comment and asked for more details, particularly in regards to PL 106, whose comment period expired over three months ago.

George responded that there were a dozen or more PLs on the desk of Greg Janosik (AFS 240) that was in addition to the half a dozen or so that are currently on draft site or just came off their comment period. Tim stated Greg had indicated to him that Greg actually had 25 letters in hand. George responded -it is going to get interesting.

Tim expressed concern that there was no attendance from FAA HDQ to report on the status of those PLs that were on this meeting agenda as action items from the previous meeting.

George then informed the IG that, in addition, AFS 240 has taken the NEF universal list of the website and it and associated PL 116 were under re-evaluation. He stated discussions have ensued within FAA HDQ on efficacy of NEF.

Tim asked whose decision was it to do so and George stated it was done under the authority of AFS 240 and it too was on Greg's desk, stating that after Greg was revising the NEF list (and PL) it would be cycled through the 'new enhanced' internal document review process. He said that means it must pass thru each Flight Standards branch review plus FAA Legal and could possibly take months.

Tim objected to this announcement stating how was the NEF process supposed to work when an integral piece of guidance had been removed. George stated he agreed and he hoped everyone had the forethought of having made a copy. He continued by stating the problem was FAA had arrived at the opinion that the program had gone beyond the intended scope the FAA originally perceived it to be used for.

Mark Lopez asked why FAA did not bring this issue to MMEL IG and use the PL review process to inform and resolve using the resources of IG members. George responded that there is an Industry process and then there is the FAA process and sometimes they don't align. Mark countered with that was the whole purpose of the MMEL IG, to get differences aired and resolved.

Mark asked George to comment on the fact that no PLs had been released thus far this year, referring to it as a sad situation. He asked George if he was aware of any developments on that issue. George responded that he believed PL 106 release was most probable and that a final decision on PL 98 too was possible. Mark requested from George a breakdown on the disposition of the remaining PLs. George stated he will do so.

Item remains OPEN for future updates.

Action Item: George to provide list and update on OPEN PLs.

### **94-04B: Policy Letter Status Summary**

Tim Kane (Industry Chairman / Jet Blue) referred to agenda attachment for PLs under revision. Tim stated it is reflecting that there are approximately 11 PL drafts under review with FAA HDQ, or awaiting FAA approval. Tim asked Bob Taylor, the maintainer of this status summary document, if he could add an extra column for entering date draft were initially submitted as there are now some PLs that were originally submitted approximately a year ago but this fact has been over-sighted by not being captured. A suggestion of also capturing the date a PL is finally approved on was also proposed. Bob stated he would look into adding both.

Item remains OPEN for future updates.

# PL Review Status

05/02/2014

## PL status at HQ

PL-79 Seats	In review FAA HQ
PL-29 CVR	In review FAA HQ
PL-54 TAWS	In review FAA HQ
PL-58 Flt Dk headsets	In review FAA HQ
PL-116 NEF	In review FAA HQ
PL-31 Format	In review FAA HQ
PL-98 Nav Data	HHQ decision pending
PL-106 HF	AFS-200 decision pending
PL-76 XPD	In review FAA HQ
PL-63 Inst Req EP	In review FAA HQ
PL-105 ADSB	In review FAA HQ
PL-9 PA	In review FAA HQ
PL-129 CSVS	Pending STC owner/AEG action
PL-119 2 Section	In review FAA HQ
PL-114 Nose Str	In review FAA HQ
PL-87 FDR	In review FAA HQ/Legal
PL-72 Wing Ice	In review at AEGs

## PL GC Removals Pending at AFS-240

PL-96 Galley Doors	GC date 2010
PL-32 TCAS	GC date 2006
PL-39 Alt Alert	GC date 2010
PL-84 RVSM	GC date 1997
PL-100 Cargo	GC date 2009
PL-117 SECAL	GC date 2005
PL-120 ELT	GC date 2009

### **94-05: MMEL AEG Draft Policy Letters Open for Comment**

Tim Kane (Industry Chairman / Jet Blue) opened discussion stating most draft PLs open for comment had already been discussed in the IG agenda 94-04. He then referred to PL76 and 105 as having become tied together over fact that both initially addressed relief for extended squitter. This had been fixed and PL 105 has been posted and vetted thru the comment process but now for some reason PL105 has been reposted to the FAA draft site for additional comment and he asked George Ceffalo (AFS 240, on webex) for an explanation.

George initially deferred comment as he was not involved in internal review process, but then he referred to how the 8900.1 re-write was intended to absorb approximately some 30-40 current PLs and then he b referred to those that are currently undergoing review, being worked on, or awaiting decision, AFS-1 approval, etc., stating that more personnel and extra layers of review within HDQ are now been employed on review of the PLs proposals.

It was questioned how/who had instigated that. George answered that it was from the highest level, from AFS 1. He stated that this also due to industry continually raising issues with PLs and requesting changes. He stated these instances of industry pushing PL changes has lead AFS-1 to question how and why FAA was not doing the job and so more resources are now being employed. George stated that by pushing for PL changes industry has essentially 'shot themselves in the foot:' hence industry should get used to expecting these longer process times. He concluded with statement that the days of getting PLs changed 'under the' radar' are over.

John McCormick (FDX) stated that industry appreciates the regulatory knowledge and oversight of FAA provides, but lengthening the review process in itself can be counter-productive, particularly with new programs and processes because as the reviews drags on the regulatory guidance typically is also being changed. He said industry expects a reasonable amount of review time, comments, etc., but recent actions along with comments like George's makes him feel that some members of FAA in oversight positions are reacting as if they believe industry intent is bad and they are going to stop them. He again when over the benefits of the collaborative way MMEL IG and FAA has worked to date.

Mark Lopez recognized this and stated it was one of reasons for the establishment of the webinar sessions in conjunction with meetings. He then stated that the responsibility to manage this process, from the IG perspective, resided with one individual, Greg Janosik (AFS 240). Mark stated that Greg knew of this meeting and agenda items yet provided nothing, no inputs, no substitute representation and that is frustrating and he felt an elevation of issue may be needed to A4A upper management to approach AFS-1.

Item remains OPEN for future updates.

**94-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief**

Tim Kane (Industry Chairman / Jet Blue) opened discussion with an outline of the history to date; on how the guidance on swapping parts was previously determined to best be inserted into 8900.1. He then turned discussion over to the co-Lead, Tom Helman (AFS 300), who stated he had no update to give. Mark Lopez (A4A) mentioned that after last meeting the workgroup agreed upon draft for incorporation of the Notice into 8900.1 was submitted and he had been in communication with Tom, requesting that Tom be prepared to provide an update for this meeting's minutes.

Tom Atzert (UAL) commented next, stressing to Tom the importance of this PL topic to industry. He outlined the history of issuance of Notice, the identification of inaccuracy within Notice and work industry did to draft 8900 guidance that would allow operators to place this practice of swapping parts into their GMM as a general practice / procedure. He stated meanwhile all that exists out there for operators and field inspectors to use is an incorrect expired Notice.

Item remains OPEN

**94.07: PL-104 Storage Bins**

**Objective:** Revision 7 addresses aircraft required to have certificated and non-certificated storage locations based on certification part and/or seating requirements.

**Item Leads:** Todd Schooler – Cessna/Textron

**Discussion:** Researching this PL to determine the different certification requirements for stowage locations and galleys come to address both large and small aircraft, for aircraft that do not conform to standard design configurations as aircraft with traditional galleys

Workgroup

Todd Schooler – Cessna (Lead) (tmschooler@cessna.textron.com)

Dean Hartschen – Beechcraft (dean\_hartschen@hawkerbeechcraft.com)

Tim Kane – Jetblue (tim.kane@jetblue.com)

Thiago Viana – Embraer (thiago.viana@embraer.com.br)

Item Lead, Todd Schooler, provided the background to how current PL does not support the design standard and fit and function of stowage closets, bins on GA and Biz Jets that unlike Part 121 certified aircraft require the affected compartment door(s) to be are factored into the containment of equipment stowed within. He did research on the certification basis of current PL what directs, in some cases, relief can only be provided if affected door(s) are removed. He performed historical research on the origins of most of the existing certification standards and discovered they all seemed to be based around mass load design standards that originate from the 1950-60s era, and all were directed to strictly Part 121 operations.

(Continued)

Draft of PL 104 was reviewed and Todd outlined the how Part 25, less than 19 seat aircraft do not have a galley(s) but refreshment centers, thus he has added this to the MMEL title. He said with all the customized interior designs on these smaller aircraft certifying to the galley certification standard would be prohibitive due to these mass load standards having to be demonstrated on vast number of custom interiors. Next he has added CFR Part 121 effectivity to existing PL relief that requires the affected door be secured or removed. This was followed by a substantially revised alternate mode of relief, listed as effective for all other operating Parts with provisos regarding door secured closed and not used, along with provisos addressing equipment contained, etc.

Todd then concluded with statement that he believed this PL's has become too complicated as in his opinion; it has evolved and strayed from the intent of CFR(s). He thus suggested that it should be considered that the PL provisos be struck and this letter be revised into an informational only PL. Paul Nordstrom (Boeing) questioned why the PL even needs to be revised. He stated this PL was premised upon the fact that items of equipment stowed in closets, bins, etc., are permanently affixed. He stated he therefore felt if Todd's aircraft do not have the equipment affixed then the PL is not applicable. He stated he felt Todd was trying to re-define what is meant by permanently affixed. Paul seemed to be suggesting that the PL should be left alone.

Members of the group questioned the logic of Todd proposed provisos and raised questions as to the type of equipment that are being affected. Questions were raised about effectivity statements and the difference between 121 and aircraft certified under 'other Parts.' How stowed equipment needs to meet the required G load standards, etc. Todd explained again that on his company aircraft the actual door is used to meet the load restraint standard. Todd stated he was open to further suggestions on how to advance the PL draft and to suggestions on the approach to take to address all concerns.

Item remains OPEN.

#### **94-08. PL-98, Navigation Databases**

**LEAD** – Greg Janosik- AFS 240 to provide update.

Key stakeholder FAA HQ absent and No Update provided.

Item remains OPEN.

#### **94-09. AC 117-1 Crew Rest Facilities**

Tim Kane (Industry Chairman / Jet Blue) opened discussion stating that he has been communication with Bob Ireland (A4A) who had informed him that there was still an open issue, discrepancy in the current PL 130. He asked A4A representative for comment. Mark Lopez stated the previous A4A Lead, Bob Ireland, did not leave any remarks for him to convey to group. Tim gave a brief outline on basis for PL, that it was based upon an Advisory Circular which in turn was derived from an SAE Spec. He then drew the group's attention to the PL discussion statement that temporary repairs cannot be made, any repair must in accordance with 43.13.

Someone within group stated the reference to no temporary repairs was in regards to crew rest facilities' curtain; that a temporary repair to a curtain may not satisfy the requirement(s) of the Regulation. Tim stated if a repair restores fit, form and function then it should be allowed. Tom Atzert (UAL) interjected that a temporary repair will not allow seat/rest facility to retain its classification under the Reg. He then characterized that as only one of the issues.

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Discussion moved back to the statement repair must be in accordance Part 43.13. Mark Lopez stated that typically large transport category carriers use as a part of MEL maintenance deferral process procedures that are published in their GMMs and the referenced 43.13 section does not apply to them, as they are using their maintenance program. George Robert who authored the PL Policy guidance gave explanation as FAA wanted to ensure a properly engineered and authorized fix would be used. He stated they were concerned over degrading the classification of facility, etc.

Suggestion on tabling item and allowing more time to garner feedback was made but when Tom Atzert stressed he felt this PL needed to be fixed as soon as possible. He related an issue that occurred at recent 777 FOEB where the AEG Chairman suggested he would insert PL relief verbatim into MMEL as it is currently written. Tom stated that they were able to get him to forgo that by stating PL was currently undergoing re-evaluation and would be soon revised. Tom stated as written current PL is not very well structured to be inserted into an MMEL. Yet PL was rushed out as the crew rest regulation was about to become effective.

Mark stated his supervisor, Bob Ireland (A4A), wanted to retain Lead on this agenda item as he is on the workgroup that is revamping the SAE and AC standard that this PL originated from, etc. Tom stated that Bob needs to work with the FAA Lead, Dale Roberts (AFS 200), who is a guru on Part 117 and the associated crew rest facility classifications. Tom stated they need revisit and revise the PL and come up with a PL that can easily be applied to MMELs.

Next Tim Kane stated the PL needs to specifically address 43.13 (c) that states in part:

“...the methods, techniques, and practices contained in the maintenance manual or the maintenance part of the manual of the holder of an air carrier operating certificate or an operating certificate under Part 121 or 135 and Part 129 operators holding operations specifications (that is required by its operating specifications to provide a continuous airworthiness maintenance and inspection program) constitute acceptable means of compliance with this section.” (Continued)

He said that this under this guidance the operator just needs to ensure their GMM list the acceptable means of compliance is for the various components that could impact the classification of the crew rest facility. Tom Atzert then referred to the PL guidance step 4 stating it contradicts what Tim just stated in regards to 43.13 (c) and GMM procedures. Tom stated this is an example of haste in releasing PL to meet the implementation date of FAR that leads this PL to not very usable.

George Roberts (Delta Airlines) outlined his understanding that having procedures in GMM did not supersede the requirement of 43.13 but satisfies it. So he added the 43.13 reference to the PL guidance step 3. He also explained the intent of step 4 was not contradict of 3 as performing a repair per 43.13 returns a component to service and thus there is no item needing to be MEL'ed.

Discussion regarding CRF classification and components associated with it and impact on maintaining the classification if a component is MEL'ed was held. The example was an inoperative window shade and the impact on classification. It was stated this example was a reach to get some form of relief in the PL. Tom chimed in with statement it an example of a rush job and not vetted by workgroup due to haste to make deadline. Mark Lopez informed group of Bob Ireland intends to re-convene the group and re-work PL and that an R\_1 draft will be available for next meeting.

Workgroup membership was reviewed.

Item remains OPEN.

### **94.10: PL-24 Lavatory Fire Protection**

Darrel Sheets (NetJets) presented his draft to PL 24 and outlined that his issue revolved around the current PL's reference to an Amendment 121.185 to 14 CFR. He stated the PL has not been kept up to date with changes in the industry as the preamble to this amendment clearly states the CFR is applicable only to aircraft with more than 19 seats. Furthermore when one reviews the CFR in question, 25.854, it begins with this same effective statement yet the current active PL does not recognize that.

His proposed draft adds this to PL and in addition offers a D category for aircraft equipped with less than 19 seats. Also Darrel identified some typographical fixes he made in his draft proposal and suggested that the GC header be assigned to PL but with the statement it is applicable only to aircraft with less than 19 seats.

On issue of GC header several comments were expressed. First the expiration dating, and second concern was raised by Mark Lopez (A4A) who stated the GC header language will need to be reviewed and for Darrel ensure GC header is applicable. Further comments and questions on GC header were requested to be withheld as PL 59, GC header policy letter was to be discussed later in meeting. (Ref: IG agenda item 94-33). Darrel offered to remove GC header request to avoid it becoming a 'show stopper' to getting his proposed PL draft accepted.

Item remains OPEN.

### **94-11. PL-63 Equipment Required for Emergency Procedures**

Tim Kane (Industry Chairman / Jet Blue) stated PL 63 has been submitted to FAA, been posted to FSIMS draft document website for review and that comment period has expired. He asked Lead, Eric Lesage (Airbus), if any comments were posted. Eric stated they had received only one comment from Gene Hartman (FAA, LGB, AEG), and that Airbus has addressed that comment. Eric stated he posted the response and forwarded it back to FAA on the 31th of March.

Todd attempted to pull up the comment grid from website as FAA should have reposted it but search reveal nothing was there. Several comments were made by the IG members present, expressing frustration with how the process, as was laid out by FAA, did not seem to be followed by FAA HDQ.

An AEG representative spoke up stating that in regards to this PL he recalled that several AEG offices were late in submitting their comments back to AFS 200. He asked if this item could be tabled until these comments could be routed to Eric, Tim agreed and then asked George Ceffalo (AFS 240, on webex) if he was aware of these responses. George stated he was not.

Tim stated if the comments do not get posted, then people cannot submit justification to counter, or have any further dialogue on issue. Tim asked Eric if he could re-submit the Airbus response to the one comment that was submitted and 'cc' George. Dave Stewart (on Webex) interjected this was exactly what happened to PL 106. Tim asked Eric to include a note that stated some AEG comments are pending but have not been located.

Item remains OPEN.

### **94-12: PL 73 MMEL Relief for Emergency Medical Equipment**

Tim Kane (Industry Chairman / Jet Blue) stated this agenda item is held open to allow A4A to present any updates. He stated the exemptions for atropine and dextrose have been issued / renewed. Mark Lopez (A4A) then outlined how Airworthiness Committee has been evaluating CFR's to determine the 'top five' CFRs to take on as subjects for rulemaking changes. He said Bob Ireland (A4A) has previously recommended they tackle CFR 121-803, Emergency Medical Equipment.

Mark stated the intent was to bring the first aid kits contents up-to-date. Tom Atzert (UAL) stated that if this makes the top five list then he requests A4A ensures they also tackle the GO / NOGO criteria that apparently is written in the preamble of this CFR. He stated FAA used this as justification for changing the MMEL relief from category A, 3 days to one day.

At this point, Candice Kollander (AFA, on Webex), joined the conversation to officially go on the record as AFA strongly disagrees. .

Tim returned conversation back to CFR and PL stating that if this is re-evaluated then not just what is an appropriate total content of a kit but the number of minimally required items should be looked at too, i.e., probability of usage. Mark stated that if this CFR makes the top five cut off then all of that is on the table.

Mark stressed to IG members to bring this issue up with respective company Managing Directors and above who are on the A4A, EMMC Airworthiness Committee. He states this is how these issues are 'rolled up' and gain importance.

Item remain OPEN.

### **94-13: CLOSED,**

### **94-14: PL-79 Passenger Seat Relief**

Tim Kane (Industry Chairman / Jet Blue) reported that this agenda item has been moved on to FAA HDQ and has been for some time now. Lead, Todd Schooler (Textron Aviation) stated he forwarded the draft PL proposal to FAA in the third quarter of 2013 after IG meeting # 91. Tim stated it has gone thru the FSIMS comment period posting and review phase. He asked George Ceffalo (AFS 240) if there was any status to report. George stated he has not been following this PL and he did not know its status.

Item remains OPEN, pending update on status.

### **94-15: PL-106 HF Radio Communications MMEL Requirements**

Tim Kane (Industry Chairman / Jet Blue) opened with an inquiry as to whether anybody from FAA, either present or listening in via webex, could give a status update on PL 106. George Ceffalo (AFS 240, on Webex) reported that he thought it may have been signed but he had not seen it and thus did not know where it is located.

Dave Stewart attempted to add some details of what he had been told were being added to PL draft. He referred to an ops spec (B050) that applies to HF failures and need to place the associated flight plan coding string that must be placed in flight plan header. He stated they are also going to require this flight plan header coding also be carried as a PL proviso. Dave said he attempted to persuade them that if it is in the ops spec then it does not need to be in the proviso. He said they rejected this. Mark stated there is an ops spec working group meeting in June and he will take up this matter within that forum.

Item remains OPEN.

### **94-16: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)**

John McCormick (FDX) requested this item remain tabled until next meeting.

Item remains OPEN.

### **94-17: MMEL relief for Emergency Escape Path Marking Systems**

Dave Burk (AeroDocs) outlined how a majority of MMELs have coverage for this system, all with the same standard of relief. He said this relief contains a listing of documents that an operator must have in their possession in order to be in compliance and to take relief. He stated that this requirement is OK for most large transport aircraft but not so for smaller aircraft. His examples were a B737 versus a Gulfstream 650, Executive jet.

He reported the problem was that the STC Holder either no longer exists and thus documents are no longer available or the STC Holder will not provide them. He mentioned that there was also some form of discrepancy within the FARs but he did not elaborate on the point. He stated in order to remedy this he initially came up with a policy letter proposal but it was rejected and he was told to pursue issue via the FOEB process. He stated this approach too was rejected with exception that one AEG chairman, Gene Hartman, who oversees the Global Express fleet, responded. Gene agreed that there was discrepancy between the FARs as Dave reported.

Apparently for small transport aircraft with less than 19 seats; Part 91 does not address this system, whereas Part 135 only states it required on aircraft more than 19 seats, and finally Part 121 states system must be installed. Next he gave an example of how although not required it is an option for owners of less than 19 seat aircraft. He then referred back to his specific examples of a gulfstream 650 as having the same standard of MMEL relief as the B737 already presented. Yet when the system breaks on the Gulfstream he reports it gets no relief as the required documents are not available. Furthermore, referring to the B737, he stated it all depended upon if Boeing installed the system or a modifier after delivery.  
(Continued)

## Minutes from MMEL IG 94

April 23 & 24, 2014

Delta Airlines - Atlanta, GA.

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Thus he said he inquired with the AEGs into where did this MMEL wording come from. He stated none of AEG Chairman seemed to know, except that it seemed to be a standard and thus they apply it. He then referred question to Paul Nordstrom (Boeing) who stated it was their wording, addressing the Part 121 requirement.

Dave referred back to Gene Hartman, the Global Express Chairman who said he could not remove the provisos in question but instead he has proposed adding the phrase "When required by FAR" to the item. Dave asked again, should there be a Policy Letter as he said what it really should say for small aircraft less than 19 seats just "May be inoperative." Some IG members agreed that it worthy of a PL to correct. Further, it was recommended that he pursue a D category too.

Tim Kane (Industry Chairman / Jet Blue) asked Dave to submit a draft PL for next meeting. Several large transport category operators professed that getting these documents from even established manufacturers is also a difficult task.

Item remains OPEN.

### **94-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)**

George Ceffalo (AFS 240) reported that 3 of the 4 new re-written sections of 8900 Vol4 / Ch. 4 have be 'signed off' on as reviewed and gone for final approval but Bob Davis (AFS 240) who was retiring on this very day had just passed along the fourth chapter and this reviewed material has a large amount of comments that will need to be resolved before the document gets released. Six months to a year were cited as possible before it is all released.

Tim Kane (Industry Chairman / Jet Blue) stated that IG membership does not know the scope of the change to 8900.1 He referred to a select few who were industry participants to an early work group on the 8900 rewrite who were promised a draft of the final 8900 but who now are not expecting to be given one.

Discussion revolved around who within FAA has produced the last interim revision(s) of 8900. Mark then outlined the internal process and all that involved in making a major revision of FAA documents. Mark mentioned the IG workgroup should maintain contact with Greg Janosik in getting a courtesy copy before it goes final.

Item remains OPEN.

### **94-19: A4A MEL Survey**

Mark Lopez stated A4A sent out limited survey on MEL usage, rates of deferrals broken out by repair categories. A total of six carriers responded with a month worth of data. A4A sanitized and provided the report to participants. The data collected represented some 37,000 MEL items collectively broken down, A B, C and D spanning the month of March, 2014. A4A crunched the numbers and came up with average usage rate for the six carriers. He mentioned it was a rudimentary survey but worthwhile. He said he is contemplating putting out a more elaborate survey to capture a summer month of data to share in the future.

Item remains OPEN for further updates.

### **94-20 CLOSED**

### **94-21: PL 105 Automatic Dependent Surveillance-Broadcast System**

Tim Kane (Industry Chairman / Jet Blue) stated that this PL should not be open any longer as it was previously posted, commented on and the PL Lead, Paul Nordstrom (Boeing), has responded to all posted comments but rather go final it, for some unknown reason, had recently been reposted to fsims draft site again for comment.

The only previous outstanding action that Greg Janosik (AFS 240) was requesting to be done was to get a new draft and reposting of PL 76 as he, Greg, did not want both 76 and 105 to carry the Extended Squitter function. Paul reported this too had already been done. To that response Kevin Peters (FedEx) ask as to which PL the Extended Squitter function now belonged. Tim added in that it was removed from 76, ATC Transponder, and added to 105, ADS-B, and both were posted but now 105 has been reposted?

Tim requested George Ceffalo (AFS 240, on Webex) for a response but George was off line.

Item remains OPEN.

### **94-22: PL-86R6-D1 Policy Regarding Compliance with Master Minimum Equipment List (MMEL) Revisions**

Linda Chism (Alaska Airlines) stated her airline's problem with FAA, holding her airline to 60 days versus 90 days to get more restrictive MMEL relief presented to CMO has been resolved. She stated the FAA now recognize the intent of the PL revision Note and have backed away from holding them to just 60 days.

Dave Burk (AeroDox) spoke to the problem presented to Part 91 operators who choose to operate their aircraft under an MEL. Per 8900.1. Ch. 4 / Vol 4, Section 2, para 4-670.C.1 they are held to only 30 days versus 90 days to submit more restrictive MMEL relief. Dave stated he first requested a change to 8900 but was told due 8900 rewrite it could not be considered as of that time. He thus proposed a change to this PL 86 to include Part 91, but this too rejected. Finally Greg Janosik (AFS 240) told Dave he would entertain trying to get this re-addressed with the FAA AFS 800 and attempt to get the change into 8900.

Next, Dave mentioned a problem also existed with Preamble for the Part 91 operators. He stated besides Part 91 having a Preamble as is listed in PL 36, there is also a different Preamble for 91 contained in 8900.1 He said this is a constant problem as FAA Inspectors write LOI's against operators based upon the Preamble carried in 8900.1 instead of Policy Letter. Dave outlined how MMEL's rather that include the Preamble now reference the PL thus setting up the disparity.

Dave asked if IG would consider a PL update to fix this issue. Todd Schooler (Textron Aviation) agreed stated this was an issue overdue attention. He stated he believed the original intent of the 8900 rewrite committee was to revise the Part 91 Preamble in 8900 and then rescind the PL thus eliminating the mismatch and duplication.

Tim Kane (Industry Chairman / Jet Blue) directed the conversation back to 30 versus 90 days for submitting revisions by referring back to the end of IG 91 when Greg Janosik (AFS 240) had promised to get with AFS 800 and change the 30 to 90 days for Part 91 and then cancel PL 36. Dave then referred the rapidity of OEM Dispatch Guide revisions and that DDGs and MMELs are not published concurrently as reasons why Part 91 operators cannot get their MEL updated within 30 days (Continued).

Todd stated when the industry group that initially worked on the 8900 rewrite began reviewing scope of project by conducted a study on number of operator MELs that each Part generates. He said the count was 120 or so for Part 121; 500 for Part 135, and 6000 for Part 91. Todd concluded with 6000 operator Part 91 MELs being presented for FAA review, by only a handful of FAA inspectors, it was evident that 30 days was insufficient period of time. Discussion then centered around fact that a report from Greg was in order and when would FAA be in attendance again at IG meeting.

Item to remain OPEN pending future FAA update.

### **94-23: PL 104 Storage Bins/Cabin, Galley and Lavatory Storage Compartments/Closets**

Tim Kane opened the discussion of the use to term “permanently affixed” within regulation and PL and turned the discussion over to explain how the PL language to remove the door does not work in GA, 91, 135 world

Todd Schooler (Textron Aviation) gave an outline of his research of the origin of the PL and pertinent CFRs that it is based upon. He discovered that the relief afforded in PL does not fit all categories of aircraft operation as it is based upon rather ‘antiquated’ design and operations practices going back 40-50 ago. He explained that the GA aircraft as manufactured today (as described in the previous IG 94-03 minutes. The presence of a compartment door is required to met ‘G’ load and...

### **94-24: PL-119 Two-Section MMELs**

Dan Leduc (Bombardier) gave a presentation outlining how a two part MMEL proposal has been advanced since last IG meeting. Refer to attached “2 part MMEL for 121\_D4.” Power Point document.

Dennis Landry (ALPA / Delta) asked questions and raised concerns over the multitude of CAS messages presented in Dan’s presentation. Dan had shown a matrix of the different types, Warnings, Cautions, Advisories, Status and Infos and the total number of each message types that are capable of being presented on Bombardier C Series Jet.

Dennis expressed that he felt many of these would be strictly maintenance related or reporting degradations in system(s) that would have no impact on safety of flight, items flight crew could do anything about, but if presented to them during the time and heavy crew load period of preparation for departure; taxi out and takeoff, they could become a problem.

He asked if they, the design engineering groups, had considered this and built-in methods to suppress them. He gave examples of how Boeing has designed their systems. Dennis expressed concern that establishment of a 2 part MMEL would diminish this level of consideration and too many unnecessary messages would be presented to flight crews.

(Continued)

Todd Schooler (Textron Aviation) spoke on how Cessna actually has internal guidance on how many of these type message can post for this exact reason, no to overburden the crew. He stated many were designed to be suppressed, go away with a weight on wheels signal. Tim interjected with he felt as Todd had just expressed that this is a standard design philosophy that is already 'built-in' to system design.

Bill Schubbe (FAA SEA AEG) spoke to a process he called operational suitability evaluations and a part of them is to ensure these type messages when presented do not represent an additional hazard to the aircraft, or overly a burden to crew workload. He stated this all addressed in FAR 25.1309 and AC 25-1309-1A - System Design and Analysis.

Tim Kane ended this line discussion on engineering and design issues by stating that the direction next is to re-open the discussion again with FAA HDQ who has previously rejected this proposal from Bombardier (see previous minutes IG 93, agenda item 93-24) and in doing so the concept is dropped.

Mark Lopez (A4A) spoke next stating he has been in contact with Long Beach AEG as they have certification of the Bombardier C Series and he informed the IG members that the FAA was skeptic to the prospects of a 2 part MMEL. So he stated the WG did some re-strategizing on how to reengage HDQ who, Mark stated he thought should reach out to the AEGs for technical input. Mark concluded with A4A will facilitate a group meeting to discuss this issue with FAA HDQ.

Item remains OPEN.

### **94-25: PL-9 Public Address System, Crewmember Interphone and Alerting Systems**

Tim Kane (Industry Chairman / Jet Blue) requested George Ceffalo (AFS 240, on webex) provide an update on the PLs current status as it has been posted on fsims and has cleared the comment phase a long time ago, September, 2013 George stated it was in the hands of Greg Janosik (AFS 240) who is currently out of office. He could not determine its status.

Tim asked if special attention could be applied to get feedback on this PL so it can be reported to IG with release of IG 94 minutes.

Item remains OPEN.

### **94-26: PL-129 Cockpit Smoke Vision Systems**

John McCormick (FDX, on Webex) spoke to his objections with the lack movement of his proposed PL that requests assignment of a GC header to this letter. He stated his draft PL was submitted to FAA HDQ last year, July 2013. He stated he believed there were some AEG concerns but he felt these were satisfied so he does not know why it is has not been moved forward.

He outlined how it is universally understood that its form, fit and function is virtually the same of every fleet and airplane. That the PL was written as a GC PL but was only approved as a regular PL without GC header and he would like to know why.

(Continued)

John stated while his fleet, the MD-11, just recently had this item incorporated within latest MMEL revision just released the urgency to get a GC assigned to PL still exists. He said other operators with other aircraft types are still withholding installation of this equipment until MMEL relief becomes available. He stated that FAA contended that not assigning a GC to PL should not be an issue as getting an MMEL Letter Change is quick and easy for one item like this, but in fact that is not true. The MD-11 took many months and with the new internal FAA review process just revealed it will be even longer in future.

Furthermore he pointed out that a PL ensures standard guidance is applied and this has not occurred within the various MMELs so far carrying this system. He concluded that a GC PL assignment would have ensured fast, flexible and standardized relief already be in place.

George stated that many personnel brought in and many processes are involved to complete the development of PL and thus it may not result in what industry first perceived. He summarized by stating the odds of a PL changing are therefore high once initiated and this can mean a GC header requested gets removed.

Item remains OPEN.

#### **94-27: PL-029 R6D1 Master Minimum Equipment List (MMEL) Requirements for Cockpit Voice Recorder (CVR)**

Tim Kane (Industry Chairman / Jet Blue) stated this PL has been posted, has gone thru the comment phase and is still pending follow up action with AFS 240. He asked George Ceffalo (AFS 240, on webex) for status update. George had nothing to report.

Item remains OPEN... (Pending Release)

#### **94-28: PL-054 R11D1 Terrain Awareness and Warning System (TAWS)**

Collyer Burbach (Textron Aviation) stated the draft PL had been posted and has been thru the comment phase and is awaiting follow up action with AFS 240.

Jack Bailey (Fort Worth, AEG, Rotorcraft Support) brought up issue of Helicopter TAWS (HTAWS). He asked if there was any intent to separate TAWS from HTAWS as he reported that the rotorcraft industry does not have TAWS for Helicopters fully developed or procedures for it ready as yet. Jack said the TAWS as this PL addresses is only applicable to fixed wing aircraft. He stated since the flight envelope is different and helicopters operate so much closer to the ground he felt a clear separation of TAWS and HTAWS needs to be established in this PL. Tim Kane (Industry Chairman / Jet Blue) stated this would have to be set up as new business and another revision to PL 54.

Collyer Burbach (Textron) stated that he had thoughts of questioning the application of the proviso that merely states 'alternate procedures are established and used.' He explained that in his opinion if the purpose of a policy letter is to establish a standard then some form of listing of actions, conditions that should be considered when the operator is determining their procedures should be included.

He stated was not advocating that the MMEL IG should go into the business of writing (O) procedures, but due to diverse level of experience and background of their operators Cessna provides a limited set of things for them to consider. (Continued)

Tim Kane stated it was worthy of future discussion by the group and that maybe it could something that could be included in the Discussion section of a PL. Tim then summarized this agenda item as already has gone thru the FAA comment and internal review phase thus no consideration should be given to re-opening it. Collyer agreed, stating he just wanted to throw the idea out that for future state of PL drafting that PL Lead or workgroup members consider this.

Item Open. (Pending Release)

### **94-29: PL-058 R5D1 Flight Deck Headsets and Hand Microphones Reserved**

Tim Kane (Industry Chairman / Jet Blue) stated this PL was in the same status as agenda item 94-27, on hold. It has been posted, has gone thru the comment phase and is still pending follow up action with AFS 240.

Item remains OPEN.

### **94-30: Closed**

### **94-32: PL 25, Master Definition 19. Inoperative Components of an Inoperative Systems**

Gary Craig (SWA) gave an outline of what PL is intended to address. He stated work group action has not started. He intends to engage the work group as soon as IG 94 is over.

Item remains OPEN.

### **94-33: PL-59 Global Change (GC) Revisions**

PL Lead, George Roberts (Delta Airlines), stated workgroup have met but he has not had time to revise draft PL. Kevin Peters (FDX) spoke to the changes the workgroup had discussed. He said some minor word changes had been proposed to the purpose statement but nothing of substantial nature, along with removal of what was referred to as some redundant phrases.

Kevin also expressed that workgroup, and he in particular, had concerns regarding statement at end of current PL, rev 4, that states "This PL information will be incorporated in the next revision of FAA Order 8900.1, volume 4, chapter 4, and then archived as appropriate." Kevin asked the question, if this was in fact going to be incorporated into 8900 and as previously reported the rewrite of 8900 was indeed in its final review phase, would FAA entertain this workgroup revision of PL.

Kevin promised as forward the workgroup's draft along with the minutes to this agenda item so it may be posted with final minutes for IG member review. Refer to PL59r4 draft.

NOTE: Please refer to the 'PL59\_R5\_draft.pdf'

### **94-34 PL 25, triple asterisk**

Collyer Burback (Textron Aviation) stated WG is not yet ready to submit a draft. He committed to have a presentation ready for IG 95.

Item remains OPEN.

### **94-35: New Business Requests**

#### **Automation Addiction**

Dennis Landry (ALPA) opened discussion on subject of maintaining operational control of aircraft with today modern automation. He stated FAA recently issued a SaFO 13002 "A Cure for Automation Addiction" on subject and he stated FAA intends to soon visit air carrier to evaluate what they do to ensure manual airmanship in their AQP training programs.

He presented a Power Point of how pilot manual airmanship skills have eroded over the past 10-15 years. His presentation demonstrated that pilots today cannot perform basic instrument flying ability without an active Flight Director system. This was outlined in numerous examples and findings.

Finally, Dennis asked the question, do we need to 'wrap the MMEL around F/D system.' He stated today's aircraft and procedures are so dependent on the automation. He finished up stating that this presentation was just for the group's awareness.

#### **H-Taws (Ref PL-54) Jack Bailey (Fort Worth, AEG, Rotorcraft Support)**

Jack presented an outline of FAA actions to get HTAWS up and running for Air Evac and other commercial helicopters operators and the significant development issues. He outlined some of the differences between helicopters and fixed wing such ability to hover, perform lateral movement and the different operating environments such as operating near tree, buildings, power lines and minimum altitudes all present unique challenges for the system designers and regulation writers.

Jack next stressed the large diversity of type and size of helicopters along with their environment leads to problems when they try to apply the standard terminology used in existing MMELs writings. He stated that he wanted the industry group present to be aware of these situations and ensure what we propose for MMEL PLs, etc., is written to take this into account. He pointed out the difference between the words Airplane versus Aircraft.

He listed the definition of **Airplane = fixed wing**, whereas **Aircraft = All types** of craft capable of flight. He stated this was a prime concern for him as the use of the term aircraft is prevalent and it technically imposes unintended consequences, misapplication, etc.

#### **End of Meeting.**