

Minutes for MMEL IG 96

96-01b: Introduction /Administrative Remarks and Elections

IG 96-01b Minutes:

- MMEL IG Industry Chairman Donn Reece (AAL) started with introductions.
- John Pinnow (IG Co-Chair) Reviewed how the Policy Letters shifted from AFS-260 to the AEG:
 - John's Presentation reviewed new process of PL submission.
 - Aug 13th role of AFS-260 was replaced with a representative from the Seattle AEG. Co-chair has not received any current policy letters for review. All PL review had been suspended and each drafted PL will need to be resubmitted through the new process. IG was made aware of these changes at the last meeting.
 - Co-Chairs will be the only point of submission for future Draft Policy Letters, IG must be in agreement before submission or else the process will not work.
 - Co-Chairs will be able to receive draft PL.
 - Existing process was a hub system AFS-200 or their representative took the comments from the IG and the Co-Chairs AEG created a debatable Policy Letter.
 - New process is for the industry Co-Chair to submit the PL to the AEG through the AEG Co-Chair. Will go through the AEG review process for a technical review, then is processed by the AFS-200 to create the PL. This moves from a hub system to a more linear process to increase efficiency.
 - FAA is not responsible for the PL submission process, but they have defined this standard form of submission that was recently distributed via A4A.
 - New process is measured with tighter tolerances; measured with business days. They have roughly 10 business days to process and submit for review through their AEGs, totaling roughly 15-20 business days to answer a PL submission.
 - PL will not be altered before being sent to AFS-200 for review to ensure PL is not changed, creating an undesirable outcome.
 - Question was asked about a tracking method to identify bottlenecks and is the process documented? Tracking is accomplished via internal FAA Sharepoint. It is also documented within the FAA, A4A will make a proposal to add this to the A4A Charter Document.
 - Question was asked about public comment; there will be a 30 day comment period available after passing through AFS-200.
 - John McCormick (FedEx) commented on definition of consensus. IG has work to do to define internal process to distinguish between consensus and unanimous.
 - Donn Reece commented, when do we know it is ready to be handed to FAA Co-Chair? When do we know it is consensus? Participation is paramount. 30 days should be sufficient time. Industry Co-Chair should know when they have reached consensus before submitting. If AFS-200 disagrees, the process leads for the information to be passed back to the IG via the FAA Co-Chair.
 - Donn Reece closed by mentioning 2-3 policy letters were kept by Greg that Donn wanted to verify that were still being reviewed. A4A needs to follow up with FAA.

96-02: MMEL IG/FOEB Calendar

- Mark Lopez advised Calendar events now being recorded on A4A Member Portal / MMEL IG Website. However, there is concern for the public access to this avenue moving forward.
- 4Qtr 2015 FOEB for DHC-8-400 Dec 9-11 at LGB AEG Offices
- 1Qtr IG 97: ALPA HDQ Herndon, VA, Jan 28-29
 - Survey sent out for attendance / pre security clearance
- 2Qtr IG 98: Textron Aviation (Cessna Facility), Wichita KS, 29-30 April.

- FOEB for A350-900 tentatively scheduled for June, 2015. Lead Airline: American Airlines, location Miami - Time TBD
- 3Qtr IG 99: FAA Seattle, tentatively scheduled to held at FAA AEG, Renton - Dates TBD
- 4Qtr IG 100: Dallas, hosted by American Airlines - Dates TBD

96-03: MMEL Agenda Proposal & Coordination Process

- Donn Reece advised Kevin Peters has revised this process.
- Kevin Peters via telecom, Comments were made at 95 IG deemphasizing the term "Lead Airline". 121 Operators will still preserve the lead airline concept. Non Part 121 operators adopting the term "Focal".
- MMEL Agenda Proposal & Coordination Process Document 5.1 – 5.13 table outlines the FOEB process.
- Document containing lead airlines needs to be verified and updated.
- Item 5.3 of document, Draft MMEL agenda Items pertaining to approved STC's/FAA Form 337 will be struck.
- Appendix A contains MMEL Lead Airlines and is designed to exclude individual points of contacts in an attempt to limit revisions.
- Mark Lopez action item to post document to A4A website.
- Kevin Peters proposed a document change request form for this document and instructions on how to submit this. Mark Lopez advised this can be accomplished via the A4A website. Distinguishing between administrative or editorial changes must be made.

96-04: MEL Policy Letters

96-04a: PLs Issued in 2014

- PL-106 High Frequency Communications 06/6/14

96-04b: PL Status Summary

96-05: MMEL AEG Draft Policy Letters – Open for Comment

- Action item taken to update status summary document by A4A.
- Confirmed Policy Letters received via email by Donn, John and Mark from Greg J:
 - ❖ PL29
 - ❖ PL54
 - ❖ PL58
 - ❖ PL63
 - ❖ PL79
 - ❖ PL105
- Mark Lopez mentioned emails regarding policy letters received from Greg Janosik sent to Mark, Donn, and John; they are ready to hand off, but there are several documents attached including comment logs that need to be reviewed.

96-06: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief

- Tom Helman advised no success in getting a response. Good news headquarters decided to reissue notice that went out previously with reason of why nothing was done as far as getting revisions published for 8900.1.
- Revisions themselves into 8900.1 have been held up for AFS-140 for going through the publishing process. MFMT advised everything submitted in April 2014. Delayed due to SAS, unknown when they will get to it at this point.
- Tom Atzert advised the notice that was issued is it going to read as what we originally proposed, several commented that this was unacceptable. Revised notice should be accepted. A4A Action item to call Steve Douglas to determine status.
- A member asked assuming a good notice comes out in due time, is that basis for the operators that if there is a change to the 8900, operators can point to it to base their GMM procedures on the contents? The question lies within the timeline. This must go through a project lead. A4A action item to follow up on the status.

96-07: PL 104 Storage Bins - CLOSED

Todd: Go ahead and close it. Un-fightable. PL that exists now if you look at cert rules and the preamble, this PL has morphed into something it shouldn't be. Not sure what else to do with it other than close it. Propose to close. Language of the PL describes for Part 121 operations only for 19 seats or more, but that is not what the PL is written for. Therefore it is not a safe PL for everyone. This is not a global change. In reality, it may not ever come into play anyway.

96-08: PL-98 Navigation Databases

- PL 98 remains open, it is one of the PL that still lives at AFS-200 that was never sent back. Greg didn't like it anyway. So it cannot be sent forward. According to Greg, it is not an AEG issue.
- John: what should we do? If there is a new process, how do we find out the status of this?
- Donn: Since Greg is out of it now, hopefully he passed this over to the new guy. So does the new guy have these policy letters?
- John: Mark Lopez, Do you know where these stand? Where do we go from here? Feel we have consensus on the matter, just waiting on the review of the policy from the feds. Would like an update on where it stands so modifications can be made if necessary. How can we get this moving?
- Dave Stewart via telecom advised Bob Davis was working it prior to his retirement.
- Greg was talking about making it an OPSPEC, which is not being covered by the OPSPECS working group.

96-09: AC 117-1 Crew Rest Facilities

- Mark Lopez: No update. A4A Bob Ireland still in charge of it, but needs pilot participation. Mark is not involved. Bob trying to coordinate through Delta Airlines, along with Dale Roberts (AFS-200) with the FAA. Mike Hines is still a contact to utilize through ALPA.
- Paul: Getting questions from AEG. Our position is that PL130, we don't want to put anything in the master MEL. Have we talked about whether this needs to go into the Master? New process is going to lead the way and help determine this as will be able to get AEG input.
- Operators have already begun implementing language in their MEL regarding AC 117. Last meeting effort was made to reconvene and polish the PL before any MMELs are revised to incorporate PL130 or it will be redundant work.

96-10: PL-24 Lavatory Fire Protection

- Darryl Sheets (NetJets): Coming out of MMEL IG 95, sent update to Donn October 07 with explanation of why and what but not submitted to FAA. This item was never posted on A4A. Comments within this PL came from previous IG meeting groups.
- Motion to post on A4A website for those who have not seen it to comment.
- Mark Lopez noted that there will be one offs during this transition to the new process and that some PL's existing work should be sufficient to submit without going through the entire process again for the sake of time.
- Mark: What if we make a revision to a PL that is already a Global Change: John: Every time a revision is made that is a Global Change would need to be re-evaluated.
- Donn: What are examples of legitimate changes that warrant re-evaluation (example would be airplanes with 19 seats or less).
- Donn: We need a list of legitimate global change reasons. John: you will know what the reason for the change is when submitting. Mark Lopez: It could be system specific, related to an FAR or to a PL.
- Justification for a GC: Is time a consideration, especially considering safety aspect? John: During FOEB review, a lot of times the OEM doesn't support it, so it has to be pulled back out. So making a global change gets it in quickly, but often times it just leads to having it removed back out, causing a lot of issues.
- John: If I was a chairman reading this letter, the reason for the GC should affect all airplanes. If GC causes conflicts for people that have it put in their MEL, but when PLs are created such as the ones created in IG meetings, but some PL's have to be removed because the GC didn't take into consideration of some other aircraft.
- Donn: When submitting a GC, we certainly overlook certain aircraft types. Do we make exceptions for the GC for aircraft that do not apply? Need to address on the email that will be sent by Darryl.
- Will press on with this PL.

96-11: PL-63 Equipment Required for Emergency Procedures

- There was discussion about the version numbering for this PL. The file name and document numbering did not match. Need to name if D1 for the submittal. Tim Kane noted that there is a history with the draft numbering. The draft at the IG level maybe "D6", but when it is submitted to AFS, it would be considered "D1". Which is it because the IG has tracked it in development, but then what should it be considered when submitting to AFS? John McCormick suggested that we keep it simple as far as the draft number, and keep the IG and FAA numbering the same. Eric Lesage suggested that we use the draft numbering for the IG, and "P" for proposal for when submitting it to the FAA. The IG chair will maintain the proposal numbering.

96-12: PL 73 MMEL Relief for Emergency Medical Equipment - **CLOSED**

- Donn started this discussion by commenting that for all practical purposes this item is closed. There was some discussion about availability of some of the supplies for the kit. This may be the only reason to keep item open. Mark Lopez said that there are operators who want to revisit the 1 flight day limitation and propose 3 flight day relief again. Tom Atzert recapped his understanding of this issue and FAR. If rule making is opening the FAR regarding required components of the kit, Tom would like A4A would at the same time revisit the no go status of the kits. At the time, rule making (FAA) wanted no relief for the kits. Pete Neff says he gave us a present and gave us one flight. Tom does not care if item is closed or not on agenda. Mark Lopez suggested that we close this item.

96-14: PL-79 Passenger Seat Relief

- Todd Schooler reviewed status of this PL. It had been posted to PL draft site. Comments received have been addressed. IG reviewed again. Todd will submit it to Donn for submission to FAA (John Pinnow).

96-15: PL-106 High Frequency Communications - ICAO 2012 Implications

- Dave Stewart contacted FAA regarding this PL, regarding the use of HF data for this relief. AFS 400 supports use of HF data and wanted Dave to submit revision of PL 106. Dave removed specific radio vendor names to make it more generic to avoid future revisions of PL for other future vendors. A letter has been sent to the FAA lawyers to add HF data back into the relief. Waiting for their response (about 6 months), and then will proceed with submitting revised PL 106 to IG. Keep it on the agenda.

96-16: PL-XX Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)

- John McCormick says this group for this PL has been idle. Would like it to be a GC. Will continue work on this PL with new IG and AEG process. John addressed PL 121(EFB) at this time, see agenda item 96-36. John also discussed opening PL 100 MMEL/MEL relief for Cargo Restraint Components. MMELs across various fleets are inconsistent regarding cargo loading systems. They have or they don't. Others voiced their opinion that they did not feel that this PL was worth opening for this reason. They suggested that it be handled through FOEB with affected fleets.

96-17: MMEL relief for Emergency Escape Path Marking Systems - **CLOSED**

96-18: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)

- There was some discussion about who (FAA) could update us on this item. Mark said it should be kept on agenda, and that A4A would follow the progress of the 8900.1 rewrite. Mark did follow up on status and it looks like it could be published by our next meeting in January.

96-19: A4A MEL Survey

- Mark said that he was not sure why this was still on the agenda – **CLOSED**

94-20: OL 72 Wing Illumination Lights - **CLOSED**

96-21: PL 105 Automatic Dependent Surveillance- Broadcast System

- This item is one PL that came from Greg Janosik. Paul Nordstrom says it is ready to be submitted to Donn and AEG (John). Paul asked about the sister PL, 76. What is the status? It was determined that it was in approval process at the FAA and that Mark would follow up on the status.

96-22: PL-86R6-D1 Policy Regarding Compliance with Master Minimum Equipment List (MMEL) Revisions

- Donn says that it is complete pending rewrite of 8900.1. This agenda item is only open until it is confirmed to be in 8900.1. Mark brought up item 96-41 at this point. See agenda item 96-41.

96-23: PL 104 Storage Bins Cabin, Galley and Lavatory Storage Compartments Closets - **CLOSED**

96-24: PL-119 Two-Section MMELs (For Part 121)

- Dan Leduc Bombardier received communication from AFS 200 to not allow PL for part 121 Ops. AFS discussed with Transport Canada and made them aware for rational for the decision. The reason for decision

has not been shared with Bombardier. A solution was proposed to the LGB AEG, but was perceived as an alternate 2 part MMEL. They were referred to the previously mentioned decision by the FAA. They are at looking at alternate solutions. Dan would like rational for denial from the FAA. There was discussion about to whom the FAA talked to in Transport Canada. Someone from Transport Canada gave the FAA a negative impression of 2 section MMELs, which Transport Canada allows. It was suggested that we could submit a draft of this PL. allow it to go through AEG review, then it would be sent to FAA HQ where they would review it.

96-25: PL-9 Public Address System, Crewmember Interphone and Alerting Systems

- This is one of the PLs received from Greg Janosik that could be ready to be submitted to Donn, and then AEG (John). The group reviewed some comments and tried to reconstruct them to determine if it was ready to be submitted to Donn. Paul challenged some comments as being subjective. John Pinnow tried to reconstruct SEA AEG comments, and suggested that if it were submitted again, that comments would be generated and given back within a couple weeks. It was determined that Paul could address the one concern from SEA AEG, and submit it to Donn and then AEG (John).

96-39: PL 121 Electronic Flight Bag

- There has been a lot of activity recently that affects this PL. A quick conference call was recently set up due to proposed change in AC. Looking to work to harmonize and in parallel on this PL and new AC. Does anyone here need some change to this PL right away? We would like to wait to work in parallel with proposed AC to revise PL 121. The proposed EFB AC could take most of this next year (2015).

96-41: MMEL Publishing criterion

- Mark introduced a new item regarding publishing of MMEL and 90 day requirement to submit for approval. The MMEL may be published days/weeks after the revision date. Dan Leduc says that Transport Canada has a policy regarding the posting date instead of the revision date being the reference for compliance. **Action:** Mark to follow up with AFS-260 for possible 8900.1 change – when 8900.1 changes are released.

Day 2

96-26: PL-129 Cockpit Smoke Vision Systems

- Donn introduced this agenda item. John McCormick was not present to discuss this item. Donn said that the IG discussed whether or not this PL should be a GC, and that there was an issue tied to it being an STC (EVAS). Sam Kern provided some history of the PL, and that it was originally proposed as a GC because it was a standalone system, attached to aircraft in cockpit, with essentially the same STC for all fleets. John Pinnow said that his recollection of the AEG perspective is that they were concerned about this PL being too generic. That the relief could be applied to smoke displacement systems other than EVAS. Sam Kern and David Edgar stated that the STC number is in the current PL 129. Todd Schooler said that he could not support this PL because Cessna did not want this system installed in their aircraft. It was also noted by Todd and Gene Hartman that an STC MMEL item does not comply with PL 109 (STC MMEL Relief Process). Tim Kane noted that there have been issues with certification of the STC by the ACO, and then approval of the MMEL relief by the AEG. We will keep it on the agenda.

96-27 PL 029 R6D1 Master Minimum Equipment List (MMEL) Requirement for Cockpit Voice Recorder (CVR).

- Mark reviewed PLs that we needed to check the status of those that were received from Greg. These are not on the agenda. PL 29. It is on the agenda, item 96-27.
- Collyer Burbach noted that comments from FAA on this draft should be looked at, and suggested that the final be resubmitted to FAA without going to IG again. PL 58 Flight Deck Headsets and Hand Microphones are not on agenda but one of the items Mark wanted an update on. Collyer said that he wants to pull this one back and verify a couple things pertaining to the regulation and the PL. There is also a new technology that he would like to see if it needs to be addressed in the PL.

96-28 PL 054 R11D1 Terrain Awareness and Warning System (TAWS).

- Collyer reviewed comments generated by latest draft of this PL, there were five total. He will address them and resubmit this PL draft when ready. Jack talked about difference for helicopter for TAWS and this PL. Address the fact for helicopter has different regulatory requirement in HIMS (SP?) 135.605 HTAWS. TAWS is not same as HTAWS. Jack would like to somehow accommodate HTAWS in this PL or other way. HTAWS regulation is currently on hold, but could become effective soon. John sees no reason that this PL could incorporate HTAWS. Darrel suggested that HTAWS be address in its own PL. This would help both PLs move forward more quickly. Maybe add reference in PL 054 that HTAWS is not covered in this PL. Collyer noted that he would not be able to head up a PL on HTAWS, but could help. Todd said that he may be able to help out.

PL 58 Flight Deck Headsets and Hand Microphones (item not on agenda)

- No comments. Collyer will review this PL and it will come back to IG for review.

96-32 PL 25, Master Definition #19. Inoperative Components of an Inoperative System - **CLOSED**

- Gary asked to close this agenda item. Not any other operators having this issue. Don't see a way forward right now with PL.
- Gary asked for an update on issue related to the A4A EMMC acceptable methods for deferring with the MEL and how operators can and cannot accomplish deferral procedures. This has to do with references outside of the MEL (maintenance manuals, EOs). Mark related that A4A called a meeting for operators. AFS 300 drafted a policy/notice. Mark edited the policy letter in August. Have not heard anything since. Mark contacted Ken Kerzner, AFS 300, for update. It is awaiting branch manager approval. Ken will help move it along. Mark also updated IG on related item of procedures (disconnecting cannon plugs, pulling circuit breakers, etc.) that are not spelled out in MEL/MX procedures. A4A sent a letter and received an answer via a letter. It does not completely answer the questions A4A posed.

96-33 PL 59, Global Change

- Mark said that this is one of the PLs that is in FAA HQs, but does not have any comment sheets, etc. Mark will follow up with FAA HQ to determine this PL status. There was some discussion about whether or not to send through the new process, or let it run its course in FAA AFS 200. John Pinnow suggested that it be sent through new process. Mark was concerned that if AFS 200 has it in their approval process, that this could cause confusion or delay unnecessarily. It was unclear if the PL was ever submitted to Greg for FAA approval. A copy of the draft (R5) was found and reviewed. PL 59 was sent to IG (Donn and John) for AEG review.

96-34 PL 25, Triple Asterisk

- It was posted for A4A comment and received a couple comments. Collyer suggested that it be reposted for one week for additional comment from A4A members.

96-39 PL 121 Electronic Flight Bag

- See above. This item was discussed on Oct. 29th.

NEW Business:

- Donn brought up item that was not on agenda regarding the IG Charter. Mark asked for members to work on IG Charter working group, who includes John Pinnow, Tom Atzert, Paul Nordstrom, Kevin Peters and Todd Schooler. John Pinnow offered to produce a flow chart for the PL submission and approval process.

Presentation of Manufactures Expectations on MMEL Publication and Approval.

- This presentation presented by ASD, AIA, and GAMA reviewed a proposal for the MMEL to be part of the manufacturer responsibility, similar to Flight and Maintenance manuals. This would help produce up-to-date MMELs, harmonize and sync publication of EASA and FAA MMELs. This would also have the additional benefit of reducing the workload of the regulatory authorizes. A letter has been sent to EASA and the FAA with this proposal.