Agenda for MMEL IG 87

August 15 & 16, 2012 **Boeing - Renton, Wa.**

Time	Agenda Item Number	MMEL IG 87 DAY 1 Wednesday August 15, 2012	Lead
0800-0815	87-01	**Introduction/Administrative Remarks** **Hold Elections**	MMEL IG Chairman
0815-0830	87-02	**MMEL IG/FOEB Calendar**	MMEL IG Chairman
0830-0845	87-03	**MMEL Agenda Proposal &Coordination Process**	MMEL IG Chairman
0845-0900		**MMEL Policy Letters**	MMEL IG Chairman
	87-04A	**PLs Issued in 2012**	
	87-04B	**PL Status Summary**	
	87-04C	**PLs Under Revision**	
0900-0910	87-05	**Policy Letter Process - A Focus on Comments**	AFS 240 – Greg Janosik
0910-0920	87-06	**PL 77 Cockpit and Instrument Lights, Proviso a) - "Not on Emergency Bus"**	Working Group T. Schooler, D Landry, M Baier, E Lesage
0920-0930	87-06A	**NEW AGENDA ITEM:** **PL 77 Cockpit and Instrument Lights, Proviso a) "Not required for an emergency procedure"**	USA – Bob Taylor
0930-0945	87-07	**NEW AGENDA ITEM:** **PL 24 Lavatory Fire Protection**	Cessna – T. Schooler Netjets – D. Sheets
0945-1000	87-08	**NEW AGENDA ITEM:** **MMEL Supplements**	Cessna – T. Schooler
1000-1015		**BREAK**	
1015-1045	87-09	**NEW AGENDA ITEM:** **Swapping Compatible Component Positions to Apply Minimum Equipment List Relief**	Tom Helman – FAA (AFS-330) Tom Atzert - UAL)

Time	Agenda Item Number	MMEL IG 87 DAY 1 (Continued) Wednesday August 15, 2012	Lead
1045-1055	87-10	**NEW AGENDA ITEM:** **Flight Crew Placarding**	AA – Mike Baier
1055-1105	87-10A	**NEW AGENDA ITEM:** **Placarding Inoperative Systems for Inoperative Components**	AA – Mike Baier
1105-1120	87-11	**CFR 382.63 -What are the requirements for accessible lavatories?**	FAA (AFS- 240) – Greg Janosik
1120-1130	87-11A	**PL 128 Lavatory Call System – PL Comparison**	Workgroup- T. Atzert, D.K Deaderick, G. Roberts, J. White, B. Taylor
1130-1150	87-12	**Clarification regarding what MMEL definitions are required in the Operator's MEL**	Cessna – Todd Schooler
1150-1200	87-13	**NEW AGENDA ITEM:** **87-13. PL-121 (EFB) Electronic Flight Bag**	LGB AEG - Gene Hartman
1200-1315		**LUNCH**	
1315-1345	87-14	**PL-98 Navigation Databases**	Working Group - John McCormick
1345-1430	87-15	**NEW AGENDA ITEM:** **AC 117-1 Crew Rest Facilities**	FAA (AFS-220) - Dale Roberts
1430-1445		**BREAK**	
1445-1455	87-16	**PL-63 Equipment Required for Emergency Procedures**	US Airways - Bob Taylor
1455-1505	87-16A	**PL-63 Equipment Required for Emergency Procedures**	ALPA - Dennis Landry
1505-1515	87-16B	**PL-63 Equipment Required for Emergency Procedures**	Airbus - Eric Lesage

Time	Agenda Item Number	MMEL IG 87 DAY 1 (Continued) Wednesday August 15, 2012	Lead
1515-1530	87-17	**Deferral of Items qualifying as NEF via the Operator's MEL**	UAL – Tom Atzert
1530-1615	87-18	**PL 73 MMEL Relief for Emergency Medical Equipment**	A4A – Joe White
1615-1630	87-19	**NEW AGENDA ITEM:** **Deferral of MMEL Item Subcomponents which are not specifically authorized relief in the MMEL**	Boeing – Paul Nordstrom

Time	Agenda Item Number	MMEL IG 87 DAY 2 Thursday August 16, 2012	Lead
0800-0820	87-20	**NEW AGENDA ITEM:** **Display Units MMEL Relief**	Transport Canada - Carlos Carreiro
0820-0835	87-21	**PL-130 MMEL Policy for Nose Gear Steering Systems**	FAA (AFS – 240) Greg Janosik
0835-0845	87-22	**PL-85 Lavatory Door Ashtrays**	A4A – Joe White
0845-0900	87-23	**Part 91 MMELs – Handling and Content**	FAA (LGB AEG) – Gene Hartman
0900-0910	87-24	**Policy Letter Rewrite: New Format, FAA Branding and incorporate new GC Header**	A4A – Joe White, FAA (AFS-260) – George Ceffalo, NetJets-Darrel Sheets
0910-0920	87-25	**Consideration of Options for FAA to Control Global Change Headers**	FAA (AFS 260) – George Ceffalo
0920-0930	87-26	**PL-76 ATC Transponders**	Boeing – Paul Nordstrom
0930-0945	87-27	**NEW AGENDA ITEM:** **PL-79 Passenger Seat Relief**	Cessna – Todd Schooler
0945-1000	87-28	**PL-122 Flight Deck Surveillance Systems**	FedEx – Kevin Peters
1000-1015		**BREAK**	
1015-1030	87-29	**PL-106 High Frequency Communications**	UPS
1030-1045	87-30	**NEW AGENDA ITEM:** **PL-XX Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)**	FedEx – John McCormick
1045-1100	87-31	**FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)**	FAA (AFS 240) - Greg Janosik

Time	Agenda Item Number	MMEL IG 87 DAY 2 (Continued) Thursday August 16, 2012	Lead
1100-1115	87-32	**EASA CS-MMEL**	Cessna – Todd Schooler
1115-1125	87-33	**PL-125 Equipment Relief Without Passengers**	US Airways – Bob Taylor
1125-1130	87-34	**PL 102 Cargo Compartment Smoke Detection and Fire Suppression Systems**	US Airways – Bob Taylor
1130-1135	87-35	**Guidelines For The Introduction Of New Business**	MMEL IG Chairman
1135-1140	87-36	**FAA / EASA MMEL Harmonization**	FAA (AFS 240) – Greg Janosik & EASA – Colin Hancock
1140-1145	87-37	**PL-31 MMEL Format Specification – 'Next-Gen' MMEL Specs**	FAA (KCI AEG)- Walt Hutchings
1145-1150	87-38	**Conversion Of FAA MMEL Documents To XML (MMEL Transformation)**	FAA (AFS-260) – Bob Davis
1150-1155	87-39	**New MMEL Proposal System.**	FAA (KCI AEG) – Walt Hutchings
1155-1200	87-40	**ATA – MMEL / MEL Value to Industry Survey**	A4A - Joe White
NEW AGENDA ITEMS			
		PL 119 issue	LGB – Gene Hartman
IG 87 Adjourn			

87-01: Introduction / Administrative Remarks

Item Lead: MMEL IG Industry Chairman

IG 87:

Receive nominations and hold elections for the positions of –

IG VICE CHAIRMAN

MEETING SECRETARY

87-02: MMEL IG/FOEB Calendar

Objective: Keep the calendar current.

Item Lead: MMEL IG Industry Chairman

Standing Action (Ref. IG-FOEB Calendar Rev. 87)**:**

- IG Members are to review the MMEL IG/FOEB Calendar and advise the MMEL IG Industry Chairman of any changes or updates - Robert.Taylor2@usairways.com

Action Item: IG Members are requested to consider hosting IG 91.

IG Chairman - Align calendar with the following updates provided at IG 86 -

2012

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

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

IG 87:

87-03: MMEL Agenda Proposal & Coordination Process

Objective: Keep the document current.

Item Lead: MMEL IG Industry Chairman

Standing Action:

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

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

  MMEL IG Chairman
  Robert.Taylor2@usairways.com

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

IG 86: (No attachment)

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

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

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

87-03: MMEL Agenda Proposal & Coordination Process (Continued)

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

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

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

87-04A: Policy Letters Issued in 2012

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

Item Lead: MMEL IG Industry Chairman

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

Action Item: Bob Taylor – Incorporate PL 101 into 2012 PL list.

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

87-04B: Policy Letter Status Summary

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

Item Lead: MMEL IG Industry Chairman

Standing Action: IG Members are to review the POLICY LETTER STATUS SUMMARY and advise the MMEL IG Industry Chairman of any changes that are required. Robert.Taylor2@usairways.com

IG 85

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

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

IG 86: (Ref. PL STATUS SUMMARY)

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

Action Item: Paul Nordstrom.

IG 87: (Ref. PL STATUS SUMMARY – R87)

87-04C: Policy Letters Under Revision

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

Item Lead: MMEL IG Industry Chairman

Standing Action: IG Members are to review MMEL PLs UNDER REVISION and advise the MMEL IG Industry Chairman of any changes that are required. Robert.Taylor2@usairways.com

IG 87 (Ref. PLs Under Revision – R87)

87-05: Policy Letter Process - A Focus on Comments

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

Item Lead: Greg Janosik – AFS 240

Discussion:

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

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

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

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

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

87-05: Policy Letter Process - A Focus on Comments (Continued)

IG-86: (No attachment)

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

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

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

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

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

87-05: Policy Letter Process - A Focus on Comments (Continued)

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

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

IG-87: (No attachment)

87-06: PL 77, Cockpit and Instrument Lights, Proviso a) - "Not on Emergency Bus"

Objective: Clarify proviso a) so that it does not appear to prohibit any remaining individual light(s) from being located on an emergency bus.

Item Lead: Working Group

Discussion:

IG-86:

Bob Taylor raised concern over the current wording of proviso a) which, when combined with the lead-in sentence in the Remarks & Exceptions column reads "Individual lights may be inoperative provided remaining Lighting System lights are: a) Not on emergency bus". He raised the concern that this appears to infer that the remaining operative lights are not permitted to be emergency powered. He felt this was incorrect and needed to be re-written and clarified; the group agreed and a small work group was put together.

Working Group
Todd Schooler – Cessna
Dennis Landry – ALPA
Mike Baier – American Airlines
Eric Lesage – Airbus Americas

Action Item: Working Group – Draft new language for proviso a); coordinate with Greg Janosik to ensure it aligns with draft PL 63 R4 D3.

IG-87: (Rf. pl-77 r3)

87-06A: PL 77, Cockpit and Instrument Lights, Proviso a) "Not required for an emergency procedure"

Objective: Clarify that the PL is NOT intended to prohibit remaining individual lights from being required for an emergency procedure; it is the lights that are required for an emergency procedure that must be prohibited from being deferred. Also, replace missing DISCUSSION header, and limit discussion of lights to the subject of the PL.

Item Lead: Bob Taylor

Discussion: The concern raised at IG 86 was how the language in R2 incorrectly implies that the remaining operative lights are not permitted to be on an emergency bus. At that time the point was raised how manufacturers sometimes do power items not required to accomplish emergency procedures off an emergency bus if it's a convenient source of power, and that any change to PL 77 should also consider this point. PL 77 R3 issued July 5, 2012 did address this issue but in a much broader sense than the Cockpit and Instrument Lights addressed by this PL (i.e. "interior and exterior lighting used by maintenance and servicing personnel", but it did not address the original issue; the PL now implies that the remaining operative lights are not permitted to be required for an emergency procedure instead of the original not permitted to be powered by an emergency bus; both are incorrect.

IG-87: (Rf. pl-77 r4 d1)

87-07: PL 24 Lavatory Fire Protection

Objective: Add relief for lavatory fire protection installed in excess of regulation (14 CFR 25.854), and establish a global change designation.

Item Leads: Darrel Sheets, Todd Schooler

Discussion:

IG-87: (Ref pl-024_r05_GC_d01)

87-08: MMEL Supplements

Objective: Discuss MMEL supplements.

Item Leads: Todd Schooler

Discussion: Todd has requested time to discuss MMEL supplements.

IG-87: (No attachment)

87-09: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief

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

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

Discussion:

IG-87: (Ref. n8900_192)

87-10: Flight Crew Placarding

Objective: Discussion

Item Leads: Mike Baier - AA

Discussion:

IG-87: (No attachment)

87-10A: Placarding Inoperative Systems for Inoperative Components

Objective: Discussion

Item Leads: Mike Baier - AA

Discussion:

IG-87: (No attachment)

87-11: CFR 382.63 - What are the requirements for accessible lavatories?

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

Item Lead: Greg Janosik

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

IG 86:

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

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

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

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

87-11. CFR 382.63 - What are the requirements for accessible lavatories? (Continued)

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

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

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

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

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

87-11. CFR 382.63 - What are the requirements for accessible lavatories? (Continued)

on FAA safety inspectors to provide details. Plus due to lack of manpower they only open an investigation if a significant amount complaints are received.
Final comment was made by Tom that A4A has developed a PowerPoint presentation that demonstrated that prior to PL 128 the NEF program was successfully used to address the lavatory issue and that it addressed, and met the spirit of intent of the Part 382 rule. He offered it to DOT for their review. Candice Kolander (AFA) asked to be provided a copy of this presentation.

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

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

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

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

87-11A. PL 128 Lavatory Call System – PL Comparison

Objective: Review existing PLs, DOT Rule, and CFR 382 requirements to determine that equipment addressed by PL 128 is already adequately addressed under other PLs as Category C relief; then either revise PL 128 to a C Repair Category, or cancel PL 128 entirely.

Item Lead: Workgroup - Tom Atzert (UAL), George Roberts (DAL), DK Deaderick (FAA AFS 220), Mike Bianchi (A4A), Bob Taylor (USA)

Discussion: After much back and forth, point, counter point discussion at IG 85 regarding PL 128 it was determined Agenda Item 85-09* should be closed and a new item (this item) opened to address the findings of the working group as stated in the Objective above.

*Note - Agenda Item 85-09 immediately follows this item in the IG 86 agenda for historical reference.

Action item: Working Group

IG 86: (Ref. PL 128 R1)

Please refer to previous agenda item 86-11 minutes.

IG 86-11A will be held OPEN as a placeholder.

IG 87: (No attachment)

Action item: Working Group

87-12. Clarification regarding what MMEL definitions are required in the Operator's MEL

Objective: Propose definition language for all MMELs

Item Lead: Todd Schooler - Cessna

Discussion: Proposed DEFINITIONS language for all MMELs to clarify the how to determine what definitions are required in an operators MEL and to allow for additional definitions to be inserted if desired:

IG-82:

See following para from T. Schooler.

DEFINITIONS

The required definitions listed in PL-070 must be obtained from PL-025 and inserted into the operators MEL. Additional definitions may be included in an operators MEL as desired.

Todd Schooler stated he has asked FAA to clarify that an operator must use PL 70 to determine what portions of PL 25 are applicable to MEL to ensure operators are not required, by FAA local authorities; to publish all of PL 25 as has happened numerous times.
Pete Neff (AFS 202) stated 8900 re-write will resolve this and PL70 will go away. He was asked where is the re-write progress-at? It was promised as in work but no date for completion could be given. Dave Burk states this is a real time problem now especially with small 91/135 operators and he believed the new definition as proposed would be a good interim solution.

Bob Taylor (US Airways) questioned if this is to be placed in MMEL or MEL? He stated his preference was not in MMEL as he contended the first sentence of Todd's proposed definition could be construed as to mean that an operator must publish all PL 25 definitions verbatim. He then countered that the final sentence in Todd's proposal regarding additional definitions may be placed in MEL as desired contradicts PL 70 which prohibits including certain PL 25 definitions (e.g. def. #3). He closed with an alternate proposal that the MMEL carry two statements regarding the source for definitions; the current statement to insert PL 25 definitions for the MMEL, and a new statement for MELs to Refer to PLs 25 & 70 for definitions.

Bob Davis (AFS 260) countered that Bob's alternate approach wasn't appropriate as MMEL are not simultaneous republished. He said a quicker solution would be to simply revise the PLs with a statement in BOLD in each PL, 25 and 70, that state these two PL need to be used in conjunction with each other.

Pete Neff (AFS 202) restated FAA intent is PL 70 to go away with re-write 8900.1. Discussion re-revolved around where this clarification needs to be placed.

Action item: FAA AFS 260 to place this cross reference in 25 and 70.

87-12. Clarification regarding what MMEL definitions are required in the Operator's MEL (Continued)

IG-83:

New draft 18 of PL 25 intent is to incorporate PL 70 into 25. Greg Janosik (AFS 240) reported it as a 'work in progress' and will be updated with comments posted online. The online comments were described as 'very constructive' and he thanked the group in general for positive response. He did not seem to want to delve into it on screen or discuss in detail. He reported that 18 will soon be replaced with draft 19 and he urged the group to wait for it to post and then review draft 19.

Item remains OPEN.

IG-84:

Greg Janosik (ATA 240) spoke on progress on new draft 18, and comments. PL 25 has been in draft since July and has undergone several changes. He outlined some of the major changes such as alphabetize the list, along with addition of four new definitions such as 'accessible lavatory items' and new definitions from the 07/27 released new section one of 8900.1 Vol 4/Ch 4. He stated these will be eventually removed from section one but will remain in PL 25 where they will be subject to later revision as needed. He also spoke on how he 'streamlined ' some of the language used to align up, terminology wise, with how the same item, function, etc., is stated in the regulations.

He reports he has worked with the PL Lead, Todd Schooler (Cessna) on draft and development of comment sheet, new feature of the PL draft process. He reported the industry must adjust to working with the comment list to make changes in future. Greg reported a draft will be posted for two weeks and if no comments are posted it will be considered that no concerns, opposition, etc, exists and hence the draft will be moved thru to final approval. He reported ideally a draft should not take more than four weeks to move thru the system and become final. He stated this is a requirement from FAA Legal department and hence is how we must do business from now on.

Joe White (ATA) asked for clarification of how this was different from what has been done in the past? Greg replied that in past there was no capturing of comments that have previously been posted and what form of resolutions, changes have be made to accommodate comments, etc. PL would just languish until next meeting. Thus the comment list was for disposition of comments. He went further and clarified that at each meeting comments and changes to comments can be reviewed and made and then the draft would held open for another two weeks until finally no more comments are received and thus be considered ready to go final.

Paul Nordstrom (Boeing) felt that the closure on comments should be withheld until next meeting so as to invite better participation. Greg countered that there needs to be a better process. Industry members stated that notification is lacking of posting of drafts to web. Greg stated this feedback will be taken under advisement. George Ceffalo (AFS 260) offered to take this back to FAA IT guys. Conversation was had on the timing of when the posting for comments which was stated will only be for a two week window actually begins. Greg stressed that this comment period only begins after the workgroup, IG committee, agrees that debates on initial draft have been finalized and it has been agreed to go web for posting.

87-12. Clarification regarding what MMEL definitions are required in the Operator's MEL (Continued)

Paul Nordstrom asked if we could review the comments that actually have been posted to date on list for PL 25, draft 18. Greg stated that due to the extensive nature of changes to this PL that the comment list period should be held open until the next MMEL IG. Paul requested discussion be conducted on the new definition of extension of repair categories. This was spoken at length and finally FAA present commented that while the definition may appear to a deviation from the current D95 opspecs it is needed as abuse of extensions have been observed. Discussion pursued on the appropriateness of making a definition change in lieu of opspecs change first. Pete Neff (AFS 240) stated that the re-write of the regulatory guidance to inspectors, 8900.1 should be the appropriate forum for transmitting this information as information needs to flow as expeditiously as possible, it's a timing issue and a local POI / Operator issue. It was agreed to continue the discussion via either a workgroup or via the comment list.

Item remains OPEN.

IG-85: (Reference pl-025_R18 D5, and COMMENTS to pl-25_R18_d5)

Todd Schooler (Lead: Cessna) asked what is the FAA position on draft 8900.1 re-write. He stated he has received comments draft PL 25 but since numerous definitions are planned to been moved from 8900.1 Vol 4 /Ch 4 into PL 25 he apparently is unsure how to proceed with change to PL 25? Greg Janosik (AFS 260) stated that all the yellow highlight text definitions that are currently PL 25 are verbatim from 8900 and he therefore does not want any of it, yellow highlight, to be changed. Thus only the other than yellow text needs to be addressed and PL moved on. Todd committed to respond to any comments at which point it was stated PL 25 is no longer on website for comment. Greg stated PL 25 has been in draft for two months and Greg states it was pulled down on 30 Dec 2011 and now here again is not been reviewed and comments that should have been made while PL was on the web were being presented at meeting.

Bob Taylor mentioned that another part of equation is whether the appropriate portions of temporarily re-instated PL 82, Use of Operative Terminology in MELs, had been correctly incorporated into draft PL 25. Greg stated he believed he had done so with the rework of PL 25, definition 22, Operative. Kevin Peters (FDX) expressed concern that his e-mail request for the portion of PL 82 that states the terms operative and operates normally are interchangeable and operators should have the flexibility of determining the terminology of their choice was not clearly outlined in PL 25 draft.

Greg requested Lead, Todd Schooler, to get the workgroup consensus on PL 25 and provide details to him for reposting.

87-12. Clarification regarding what MMEL definitions are required in the Operator's MEL (Continued)

Action item: Todd Schooler (Cessna)

IG-86: (Ref. PL 25 R18 D7 & Comments)

As of 03-27-12 PL 25 R18 D7 remained posted with comments due by 04-13-12.

Todd Schooler (Cessna) reported he sent the comments and the responses from industry to Greg Janosik (AFS 260) and would like to withhold comment on PL 128 (Agenda item 86-11A) until DOT gives their presentation, position on PL 128 later in the MMEL IG. Greg reported some confusion resulted in review as two versions, draft 7 and draft 8, were erroneously posted simultaneously which lead to some confusion. He stated they removed 7 and retained 8, all comments received have been answered and he feels PL 25 is ready.

Gene Hartman (AEG LGB) expressed a concern over definition 9, Dash symbol. He stated some inspectors felt the MEL should never use a dash but instead list which aircraft have which number of equipment installed. Todd Schooler (Cessna) stated this is impractical. Kevin Peters (FDX) raised the issue that MEL should not be used as a configuration control document. Several members agreed. Greg stated this is true with the 8900.1 rewrite, it states MEL is not a configuration control source. He then read off the guidance from the 8900.1 rewrite for use of variable in the number installed and number required columns. It included that what is used must be acceptable to the POI.

Discussion pursued as to the appropriateness of such statement as there was reported much variance of positions taken by different POIs and thus no standardization. Greg countered that it stands as POI has the ultimate authority for MEL approvals. John McCormick (FDX) stated he felt the 8900.1 rewrite should match the definitions as found in PL 25. He pointed to the definition of number installed in PL 25 which states normally a number is used but can be a dash representing a variable (*paraphrased*). Also he recommended that stating approved by the POI is redundant and should be struck, and that inclusion of the term POI leads reader to assume special attention is needed on behalf of the POIs, which is not necessary. Greg requested alternate proposed language be submitted for number installed and number required.

Todd stated several industry comments were related to PL 70 and he wanted to make known to everyone that a major objective is incorporation of PL 70 into rewrite of PL 25 Once PL 25 is released PL 70 is to be retired.

Action Item: Jim Foster - Submit examples of ACI to Greg.

IG Members – Submit alternate proposed language for number installed and number required.

IG-87: (Ref. pl-025_r18_d9 & pl-025_comment_form)

87-13. PL-121 (EFB) Electronic Flight Bag

Objective: Review PL 121

Item Lead: Gene Hartmann - LGB AEG

Discussion: Gene reports PL 121 "is somewhat out of date due to new rev b to 120-76".

IG-87: (No attachment)

87-14. PL-98, Navigation Databases

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

Item Lead: John McCormick (Fed-X)

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

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

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

IG-79:

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

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

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

IG-82:

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

87-14. PL-98, Navigation Databases (Continued)

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

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

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

Action item: FAA 260, Lead: Terry Pearsall

IG 83:

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

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

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

87-14. PL-98, Navigation Databases (Continued)

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

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

Item remains OPEN.

IG 84:

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

Item remains OPEN.

IG 85: (No attachment)

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

John mentioned an exception for RNP AR (SAAAR), AC 91-101A, states you cannot have an out of date database, period. He mentioned that it has been demonstrated that the wrong database can be loaded

87-14. PL-98, Navigation Databases (Continued)

on an aircraft and that a database can be corrupted. He pointed out a note in his draft that this relief is strictly to be used for out of currency issue and not other issues. He then explained how on some aircraft the information in the database is used for auto tuning of the navigation radios and presented provisos for this condition which began with basic proviso that for aircraft with database out of currency that navigation radios are manually tuned and identified (required for airplanes which automatically tune based upon data from FMS Navigation database). He then mentioned how consensus was reached with his work group teleconference that PL could have two basic levels of relief for NavDB out of currency:

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

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

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

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

87-14. PL-98, Navigation Databases (Continued)

IG 86: (Ref. PL 98 R1 D10)

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

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

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

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

87-14. PL-98, Navigation Databases (Continued)

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

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

87-15. AC 117-1 Crew Rest Facilities

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

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

Discussion:

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

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

87-16. PL-63 Equipment Required for Emergency Procedures

Objective: Clarify MMEL relief may be provided for redundant system or components used to accomplish an emergency procedure.

Item Leads: Bob Taylor/US Airways

Discussion: There are proposed MMELs (PMMEL) being developed for aircraft configurations with redundant components and systems, each of which is powered by an emergency bus. The proposal is to revise PL 63 to clarify that MMEL relief may be considered for a system or component that can be used to accomplish an emergency procedure, including those powered by an emergency bus or equivalent, provided more than one such system or component is installed, and one such system or component remains operative. System or component redundancy must ensure the system or component for which relief is being provided to will not be required to accomplish an emergency procedure.

IG-82:
See PL-63 R4 latest draft

Bob Taylor (US Airways) provided a presentation (attached) indicating that in the ongoing development of the A350 PMMEL, EASA agreed to relief for systems or components powered by an emergency bus when a redundant system or component also powered by an emergency bus remained operative (A350 PMMEL Item Flight Warning System was provided as an example). The presentation questioned if current language in PL 63 would permit an FOEB Chairman to also consider these same systems or components for inclusion in the FAA MMEL, or if current PL 63 is interpreted to automatically exclude any system and component powered by an emergency bus (regardless if a redundant system or component is also powered by an emergency bus). During discussion it was pointed out that a policy that allowed consideration of relief may actually encourage development of redundant emergency bus powered systems and components, vs. a policy that did not allow consideration of relief, which may actually inhibit development. Bob presented proposed PL 63 Rev. 04 Draft 0 as an alternative if it is determined current PL 63 would not allow the Chairman to consider such relief.

Bob Davis (AFS 260) agreed subject was worthy of further FAA consideration and agreed to take issue up with AEG and FAA HDQ and come up with a position.

Action Item: FAA AFS.

IG-83:
Bob Taylor states he was attempting to get clarification if FAA concurred with this relief philosophy as approved by EASA on the A350 PMMEL, that systems powered by emergency bus can be deferred if the redundant components are also powered by an emergency bus. He reported it was promised to be handled by Mr. Bob Davis. Greg Janosik (AFA 240) stated Bob was out of office and he would follow up with him later in the week. Bob Wagner (DAL) stated the action item is to see if FAA will be OK to amend PL 63 to allow this? Greg asked if a draft of 63 had or had not been devised. Bob Taylor stated it was a part of previous IG meeting agenda but was not promulgated forward. Greg asked if Bob could forward a copy to him.
Item remains OPEN.

87-16. PL-63 Equipment Required for Emergency Procedures (Continued)

IG-84:

Greg Janosik (AFS 240) volunteered to assume Lead on moving this PL forward. It was mentioned that Airbus has taken a position on this PL and wants to input. Dennis Landry stated ALPA endorsed movement on this PL as it will enhance safety.

Action item: Greg stated item will be tabled until next meeting for him to determine what the internal FAA position is on subject.

IG 85: (No attachment)

Note – At time of publication of the minutes the draft PL language is being worked by Greg Janosik and Bob Taylor; a draft may be posted for review and comment sometime prior to IG 85.

Bob Taylor states previously he had submitted a draft change that stated that when redundant instrument and equipment items are powered by the same power source they can be considered for relief as it will not affect accomplishment of emergency procedure. He reported Greg Janosik had routed the draft of PL through the AEGs Offices and FAA HDQ and a their input resulted in a minor change to PL. PL_R4 draft 2 was presented and new section 2 of policy was outlined that states FOEB Chairmen must ensure that the accomplishment of emergency procedures remains the priority when considering this relief.

PL_R4_D2 to be posted for comment.

Item remains OPEN.

IG 86: (No attachment)

Subsequent to IG 85 PL 63 R4 D2 was posted as draft; one comment received resulting in a D3; D3 posted with no comments received; D3 has since been removed from the draft site.

Action Item: Greg Janosik – update IG regarding status of R4 D3.

IG Chairman's Note - Subsequent to D3 being removed from the website –

- Dennis Landry expressed an interest in revisiting PL 63 (Ref. Agenda Item 86-16A)
- Airbus has expressed an interest in revisiting PL 63 (Ref. Agenda Item 86-16B)

Bob stated two positions on PL63 are to be addressed by reference to agenda 86-16A and -B (see bullets above). Greg Janosik stated that the latest draft of PL 63, R4_D3 has been moved to internal FAA coordination.

Action Item: Greg Janosik – Update group regarding status of PL 63 R4 D3

87-16. PL-63 Equipment Required for Emergency Procedures (Continued)

IG 87: (Ref. pl-63_r4_d3)

87-16A. PL-63 Equipment Required for Emergency Procedures

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

Item Lead: Dennis Landry (ALPA)

Discussion:

IG 86: (No attachment)

Dennis Landry commented that he wanted to withhold presentation of ALPA position until after hearing the Airbus proposal, agenda item86-16B (below).

Item remains OPEN

IG 87: (No attachment)

87-16B. PL-63 Equipment Required for Emergency Procedures

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

Item Lead: Eric Lesage (Airbus)

Discussion:

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

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

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

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

Regarding Airbus' second proposal of removing reference to emergency bus bar powered equipment, he stated as a manufacturer Airbus has to demonstrate that when the aircraft is in an emergency configuration that it is compliant with certification requirements and can remain in a 'safe' condition, but he stressed that a manufacturer can decide to design aircraft to go beyond these minimum specifications for sake of providing additional reliability functions to the crew. He gave example of later generation aircraft having greater power output of generators allowing redundant equipment being powered by separate emergency power sources. He thus proposed removing verbiage '..if powered by an emergency bus or equivalent..' from PL 63's second paragraph. He also proposed that the topic of whether or not items of equipment need to be emergency powered should be topic of another policy letter, Airbus proposes the focus of PL 63 be only the accomplishment of any emergency procedure. He then presented a new version of PL 63 which had the title changed to "Instrument and Equipment Items utilized for Emergency Procedures" with refined scope statement.

87-16B. PL-63 Equipment Required for Emergency Procedures (Continued)

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

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

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

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

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

87-17: Deferral of items qualifying as NEF via the Operator's MEL

Objective: Clarify an Operator has the ability to list NEF items within the MEL, should they choose to do so.

Item Lead: UAL – Tom Atzert

Discussion:

IG-86: (No attachment)

Tom Atzert (UAL) opened the discussion by stating that as a result of incorporating PL 128 into the UAL 777 MEL they would be creating an MEL for deferral of the Call Light within the accessible lavatory, while deferral of the Call Light within the non- accessible lavatories would remain part of the NEF process; realizing this would be a point of confusion to their mechanics they chose to create an MEL record for the non-accessible lavatory Call Light co-locate it within the MEL adjacent to the accessible lavatory Call Light (simplifies the process for the MEL user).

When this was presented to their local FAA, FAA objected to an NEF item being listed in the MEL. The inspector stated that there is no guidance that states an NEF item can be placed MEL. Issue was raised to resolution with their POI but was again objected to as an attempt to 'pick and choose' what regulation they wanted to comply with. Tom stated UAL feels that an operator should be allowed to use the MEL for administration of NEF items, and thus it is requested this issue be addressed by AFS 260. Greg Janosik stated he will take that under advisement and determine if doable and how it should be documented.

Action Item: Greg Janosik

IG-87: (No attachment)

87-18: PL 73 MMEL Relief for Emergency Medical Equipment

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

Item Lead: A4A - Joe White

Discussion:

IG-86:

This item created as a result of, but unrelated to, discussion of the Nose Wheel Steering Agenda Item 86- 26.

General discussion ensued on the overly lengthy amount of time the legal review is taking. Greg stated it cannot be avoided. He recognized that it is painfully slow. He stated Anne Bechdolt was actively working the EMK issue. Tom Atzert (UAL) stated that Anne had requested that anybody with additional data forward it to her in the next 30 days. Greg stated Anne is reviewing all the historical data on the issue, and the statistical data recently provided by A4A, indicating the study and evaluation is ongoing.

IG Chairman's Note – Post IG 86 A4A Managing Director, Engineering & Maintenance, Joe White provided an update indicating A4A had met with Mr Duncan, FAA Deputy Director of Flight Standards for Policy, and Mr. Dean Griffith from the Office of General Council; Joe indicated "Mr Griffith may attend IG 87 in SEA."

Item remains OPEN

IG-87: (Ref. pl-073 r5, EMK subsequent use…, N8000.320, UAL_DAL EEMK Data)

87-19: Deferral of MMEL Item Subcomponents which are not specifically identified in the MMEL

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

Item Lead: Boeing – Paul Nordstrom

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

IG-87: (No attachment)

87-20: Display Units MMEL Relief

Objective: Transport Canada has requested time to discuss MMEL relief for Display Units

Item Lead: Transport Canada - Carlos Carreiro

Discussion:

IG-87: (Ref. pl-xxx_r00_d01_2012-07-17, and IG_87_MMEL Proposal Display Units)

87-21: PL-130 MMEL Policy for Nose Gear Steering Systems

Objective: Create new policy letter to replace PL 114 Inoperative Rudder Pedal Steering

Item Lead: FAA - AFS 240, Greg Janosik

Discussion:

IG-85

Greg Janosik (AFS 260) stated FAA has ongoing plan to delete relief for tiller bar steering but preserving rudder pedal steering. This will impact both left and right tiller bars when both are installed. Because this is considered major change of policy it will be posted to the Federal Register. Several members had objection to Greg's comment that the IG members should withhold comments on PL until it is posted on the Federal Register. Tom Atzert (UAL) made the argument for the group that this, the MMEL IG, is the proper forum for critical review as topic as the group brings the expertise of the manufacturer's of system and operators of system together who can intelligently discuss the topic more so than the general public at large. Therefore, it should be first debated in the MMEL IG forum before a proposal of change goes to the Federal Register.

Bryan Lasko (ALPA) presented a presentation on why ALPA does not support nose wheel steering (NWS) via the tiller. The presentation centered on what is the next critical failure mode with tiller steering inoperative. He gave numerous examples of failures where aircraft recovery was only made by employment of the tiller. Bryan made the point to stress this. He then raised the question of where is the redundancy that allows for tiller to be inoperative. He stressed the point that there is no such redundancy apparent. He outlined a scenario based around the fact that at some airports, according to FAA NOTAM, an aircraft must utilize the longest runway to make an emergency landing. He stated that for an in-flight failure his QRH instructs him to land on the longest runway, yet for a dispatch with nose gear steering inoperative, the MEL does not contain any similar instruction. Therefore, he asked the question; "Is the MEL dispatching crews in emergency situations?"

Next he tackled the lack of simulator fidelity to demonstrate ground maneuverability to safely train handling the loss of NWS. He then critiqued several operational procedures recommended in various operator MELs such as use of asymmetrical thrust, avoid making tight radius turns as unsatisfactory. He then stated MEL relief should never conflict with PL 63 and that every aircraft he has operated has an emergency procedure that references maintaining directional control with the NWS tiller. He then posed the question how is he expected to comply with such instruction when an aircraft is dispatched with inoperative nose wheel steering. Finally he wrapped up the ALPA position that there is not an acceptable level of safety with this MEL.

ITEM REMAINS OPEN

87-21: PL-130 MMEL Policy for Nose Gear Steering Systems (Continued)

IG 86: (No attachment)

Greg Janosik provided an update on the status of Draft PL 130 Nose Gear Steering Systems indicating this is still an open action item, but FAA has prioritized issues and there will be no activity on PL 130 until they resolve the PL 73 issue (EMK/AED/FAK). Jim Foster (AEG SEA) stressed that he had previously commented that any FAA relief for Nose Gear Steering must ensure that it can be adequately trained as to how to safely conduct operations without it; Greg agreed.

The status of PL 130 remains an OPEN issue; a number of other issues then evolved; these are:

- The above led to general discussion on the activity on PL 73 (EMK/AED/FAK). Greg stated it had gone to Legal; when asked to comment on what the final content could be expected to be he refrained from providing any specifics. Paul Nordstrom stated PL 73 was recently removed off the agenda, but based on the lack of specifics regarding its content it should be placed back on the agenda.

  IG Chairman's Note - PL 73 now appears at the end of these minutes as a NEW AGENDA ITEM.

- Dennis Landry stated ALPA is requesting Bombardier provide them with the justification and test data used for gaining initial relief for the Nose Wheel Tiller on the CRJ-600 series aircraft, i.e. details of analysis, FAA inspection, and evaluation testing that lead to acceptance by the AEG; the intent being to permit ALPA engineers to understand the relief provided. Dennis indicated the data may be forwarded to Mr. John Stift, ALPA Staff Engineer (ref. IG Members list for contact info.). Dennis continued by explaining how he felt this was a major departure from the concept of the MMEL and FOEB process ensuring an adequate level of safety is maintained. Much discussion was had on perceived errors with the issuance of PL 114 such as why it has a GC header as it is strictly guidance to AEG chairpersons and does not provide any specific mode of relief that the operator can apply.

  Dennis later followed up with a PowerPoint presentation (Ref. meeting minutes bookmark AI 86-26 – Dennis Landry ALPA Nose Wheel Tiller Concerns DCA April 2012.ppt). referring to a number of historical issues regarding the MMEL IG, development of MMEL/MEL relief, and past Policy to emphasize ALPA's position, concluding with a slide summarizing why ALPA cannot support relief for the Nose Wheel Steering Tiller. Dennis concluded by reemphasizing their concern for "an expedient process to expedite PL 130".

- Slide 17 item (4) of Dennis' ppt Presentation generated additional discussion in that currently Archived PL 116 had previously given the FOEB Chairman the ability to delete relief if he believed it to be unsafe by stating "When an MMEL item requires an "O" "M" procedure and the FOEB does not have a high level of confidence in the results of paragraph (1) or (2) above, the item should receive serious consideration for deletion from the MMEL."

87-21: PL-130 MMEL Policy for Nose Gear Steering Systems (Continued)

Note: The referenced notes (1) & (2) above read as follows - (1) Solicit from the manufacturer its recommended procedure or, as a minimum, aspects to be considered by the operator in the development of the procedure. (2) If the manufacturer no longer exists, the FOEB, using available information and qualified field resources, must develop the procedure or delineate the aspects to be considered by the operator in the development of the procedure.

Tom Atzert commented there must still be a way for an FOEB Chairman to "fast track" the elimination of relief if the Chairman believes it to be unsafe; however indications are this process may now also be subjected to a public review and comment period.

- A question and answer period was conducted after Dennis' presentation. Namely, how often does this relief get applied. Dennis concluded that ALPA has tried to accommodate this relief by actively working first with drafts on PL 114, and now on PL 130, but essentially they have to come to the conclusion this relief (Tiller) is wholly unsafe. JP re-iterated that Bombardier stands by it.

- JP Dargis, (Bombardiar) gave several counter points to the PowerPoint presentation given by Dennis Landry (ALPA) on NWS relief for the CJR, these being:

  - Bombardier certified the NWS on CJR as loss of system being a less than major incident and that all certification testing was done without NWS needed.
  - As to ALPA's statement that use of differential thrust to compensate results in unacceptable jet blasts, JP stated Bombardier agrees and thus their MMEL limitations, procedures, lists the need to tow aircraft out of ramp area. Dennis's countered ALPA's experience is that not all operator personnel are not adequately trained, certified to tow aircraft on active taxiways away from ramp.
  - JP stated that ALPA's reporting that operators have placed crew members under disciplinary action for refusing to accept this 'legal' dispatch relief is of concern to them but is outside the scope of the MMEL program.
  - To ALPA's contention that collected data, reports show that operational use of this relief is wholly unsafe, JP stated that he agrees that if an operator chose not to respect the limitations and procedures as Bombardier stipulates then significant risk exists. Yet, that again is outside the scope of the MMEL program.

IG Chairman's Note – IG 86 Agenda Items 84-39: PL-114 Inoperative Rudder Pedal Steering – Removal of Relief, and 86-27 Reply to the ALPA NWS Presentation may be referenced for historical background information related to this subject. All minutes relating to the subject of NWS at IG 86 are included in this Agenda Item, 86-26.

87-21: PL-130 MMEL Policy for Nose Gear Steering Systems (Continued)

Action Item: Greg Janosik – Update IG Group regarding progress of PL 130

IG 87: (No attachment)

87-22. PL-85, Lavatory Door Ashtrays

Objective: To determine whether or not to pursue a change to AD 74-08-09 R2

Item Lead: Mike Bianchi – A4A

Discussion: Qantas has requested a change to PL-85 and AD 74-08-09 R2 based on the fact that most airlines, if not all, are operating non-smoking flights. They feel that the interior ashtray is more essential than the exterior ashtray. DAL had submitted a proposal to the FAA to revise the AD in order to give maximum flexibility to the operators. FAA rejected the proposals saying that people will smoke regardless of the operating rule. On-demand air taxi and non-certificated operations (i.e. Part 91) may still allow smoking on board and, on those airplanes, lav door ashtrays are airworthiness/safety items. AD 74-08-09 R2 applies to all transport category airplanes, not just Part 121 passenger carrying operations. Seattle AEG agreed to discuss with ACO the possibility of revision to AD 74-08-09R2.

IG-81:
ATA and Jim Foster not in attendance, defer to next IG meeting.

Bob Taylor advised the group that US Airways CMO informed them that AD 74-08-09 R2 prohibits the deferral of an ashtray serving the entry side of a lavatory door if there is no other ashtray available that can be seen readily from the cabin side of the affected lavatory door. US Airways requests that this issue be clarified by AFS 260 to ensure PL 85 correctly reflects the relief provided by the AD.

IG-82:
ATA representative stated the interpretation on the comments from NPRM have been sent EMMC for their comments, concurrence on said interpretations and a final outcome may be known very soon.

IG-83:
Awaiting AD change which Bob Wagner reported has been 'shuffled to the bottom' of priority list. Item on HOLD.

IG-84:

Mike Bianchi (ATA) stated this is still on hold. Todd Schooler (Cessna) had asked if this AD is applicable to general aviation aircraft. He stated he had asked Greg Janosik (AFS 240) to determine this with FAA if this applied to specific Part 25 and Part 23 certified aircraft to which Greg had to admit he as yet has not done. It was mentioned that it should only be applicable to the heavy metal jets. Todd explained that is not well understood and thus it, AD, could be miss-applied. Tom Atzert (UAL) stated that all this discussion is moot because the AD needs to update first. Jim Foster (AEG SEA) reminded the group that he had the AEG attempt to get ACO to amend the AD and that initiative was rejected by this group.

Pete Neff (AFS 240) stated Mike Bianchi is Lead and he should review. Mike stated he needs to put this one to bed by figuring out if changes need to be made to the AD? If so what are they? If not what should the Policy Letter look like?

87-22. PL-85, Lavatory Door Ashtrays (Continued)

Action Item: Mike Bianchi, ATA Lead

IG 85: (No attachment)

Mike Bianchi (A4A) states no follow up to report. Greg Janosik states this PL is one of the seven or so PLs currently up for signature release with removal of GC Header. Todd Schooler commented that he wanted to discuss amendment to the PL as it is not applicable to the GA, business jet community. Greg states that it was just out for comment for purpose of removing GC header, no comments were received, and thus it is in coordination for signature release thus it must now await release before discussion of future change can be entertained.

Tim Kane (Jet Blue) stated that he thought FAA was, about a year ago, going to release for comment an NPRM to update this AD but nothing appears to have happened. John McCormick asked why this PL still is even in existence as he reported that A4A occasionally, like bi-annually, recommends FAA eliminate out dated 'crazy' rules. He stated that former A4A member, Mark Lopez, once told him that in this AD tops the list of outmoded 'crazy' rules in A4A surveys of operators. He reported that FAA had informed him that they had no time, interest, in addressing this issue. Jim Foster (FAA AEG SEA) countered that was not true as he had personally worked with the ACO on amendment to make AD imposed MMEL relief less restrictive but when presented to the MMEL IG group it was rejected by the group so it stalled out. Tom Atzert (UAL) countered that there was comments submitted to the docket on this proposed amendment and nothing FAA wise occurred. Discussion was had on where today this comment resides? It was requested that Mike Bianchi (A4A) review the archives for evidence of such action.

Action item: Mike Bianchi (A4A).

Item remains OPEN.

IG 86: (Ref. 74-08-09 R3, PL 85 R4 D1 and PL 85 Comment Form)

AD 74-08-09 R3 has been released, effective 03-28-12. Mike Bianchi (A4A) outlined the enhancements to the relief offered by the AD via a global AMOC that was received as a response to A4A's request for such relief dated March 8, 2012. Greg presented a draft of a PL 85_R4 to include the new AD and AMOC relief. He asked the group if they would object to archiving PL 85 and updating the PL STATUS SUMMARY report maintained by Industry group; his reasoning was relief is in the AD and should not be duplicated in other documents. Darrel Sheets (NexJet) stated that current 8900.1 states AD does not allow an operator to update an MEL strictly upon 8900.1 He stated that he felt the rewrite of 8900.1 amends this, but it is not yet available so PL should not be immediately archived.

Kevin Peters (FDX) challenged that as it clearly states in AD 74-08-09 R3 that it does supersede the MMELs. Jim Foster (SEA AEG) stated that the FAA ACO in publishing MMEL relief in the AD has overreached as they do not have the authority of determining MMEL standards, that is the purview of the AEG. It was suggested that PL 85 be anointed GC status so as to aid operators who wanted to incorporate the AD offered relief as soon as possible. Greg re-stated that he felt keeping the PL active

87-22. PL-85, Lavatory Door Ashtrays (Continued)

was redundant as both the AD and AMOC are available. Paul Nordstrom (Boeing) stated that their foreign customers / carriers who are not legally bound by US regulations but voluntarily comply with FAA guidance use the FAA PLs as source of such guidance, and hence the PLs are a more useful source. Greg Janosik rejected this position stating the AD and AMOC are the legally approved documents and override the PL. He re-stressed that he is against duplication of information. Tom Atzert (UAL) asked what drives the change to MMELs. Jim Foster stated an AD does not necessarily do it; it must be requested. Paul stated that is the purpose of a PL. Greg stated a notice from AFS to AEG can be used to ensure MMELs are updated; until then people have the AD to consult. Paul re-stressed that the correct relief is listed in the AMOC, not the AD, and the AMOC is not readily available. Jim Foster agreed. Greg relented a degree stating possibly as an interim solution PL 85 could be a GC which would expire in four years. He stressed he could not make this call but will take it under advisement and communicate with upper management.

Action item: Greg Janosik – Determine FAA Upper Management's position on designating PL 85 as a Global Change.

IG 87: (Ref. AD 74-08-09 R3, pl-85_r4_d1, and Airlines for America Lav AD R3 AMOC)

87-23: Part 91 MMELs – Handling and Content

Objective: To discuss Part 91 MMEL(s), and how we handle them and their contents.

Item Lead: LGB AEG – Gene Hartman

Discussion:

IG-86: (No attachment)

Gene Hartman (AEG LGB) stated that while separate MMEL Preambles exist, MMELs as written are geared towards 121 / 135 operations and do not adequately address the difference between Parts 91 and 121 / 135. He suggested a work group be formed to determine how to best address this issue, whether it be via a PL, or others means, to ensure that FOEB Chairmen consider Part 91 operations not just large aircraft ops. Dave Burk gave numerous examples of existing PLs that as written only fulfill the Part 121 operation requirement; principal examples were items that carry the nomenclature of 'flight attendant.'

Gene asked George Ceffalo (AFS 260) why Part 91 MMELs are not carried on www.fsins.com George responded this is because rather than publish two MMELs, one for Part 91, and another for 121, they publish just one MMEL and give the user the option of inserting the preamble that fits their operation (Parts 91, 121, 135 etc.); he stated he knew of only two exceptions of where a 91 only MMEL existed.

Todd Schooler (Cessna) seconded the proposal of the need for different guidance for 91 versus 121 / 135. He restated Gene and Dave's position that PL writing has tended to remain centered principally to the concerns of 121 / 135 operations. He stated that he had an understanding with his AEG Chairman who understands this and that they are able to pick apart the PLs to fit Cessna's fleet; however, he reported this is not understood by the majority of AEGs, and other manufacturers and operators are forced to have to accept 121 relief conditions being imposed upon their Part 91 operation. Discussion then centered upon the fact that only until the last 5-6 years that Part 91 has been an active part of the MMEL IG, and since then PLs have tended to be more generic with the document header referring to all applicable Parts affected. Jim Foster (AEG SEA) agreed stating he felt that actual PLs writings have attempted to address all Parts concerned, but may have fallen short.

Todd gave the example of how even the generic single engine MMEL, an obvious Part 91 document, requires dealing with Part 121 requirements, citing the Nav Data Base PL as an example. George Ceffalo stated he thought the problem could be resolved with a re-write of the Preambles; he outlined how previous attempts to improve these had failed. He also stated the new GC header attempted to fix some of these concerns. Todd agreed but felt a more comprehensive education of all FOEB Chair persons is needed. Discussion continued with numerous examples of how current MMELs and PLs do not fit all aircraft configuration. One example given was a passenger configured B767 versus a B767 in a corporate jet configuration; another was the ADS-B extender squitter, with GA using a UAT instead, but the PL does not differentiate between the two. Another issue is that some PL are just out-dated. Todd gave the example of how some aircraft do not have physical CBs but are equipped with virtual breakers instead.

87-23: Part 91 MMELs – Handling and Content (Continued)

Bob Taylor (industry chairman) attempted to bring closure to the discussion by asking for a summary of what is needed, a workgroup study, PL creation, or other process? Tom Atzert (UAL) stated the scope of issue needs to be defined before attempts to fixing the problem is pursued. Discussion then centered on scope, and then on whom within the IG group should be involved in a workgroup. Gene stated he was not proposing creation of extra work, but instead to heighten awareness that the group could do better. Greg Janosik stated the only way to improve the process is to work the issue. He stated it is not an issue of doubling PL count but ensuring AEG chairman are aware of and take into account the needs of Part 91 operators. Greg stated it is something this group can handle and does a good job at, but not enough AEG chairman attend these meetings, indicating that is a problem he has to address. He stated until that changes the PL output of the IG has to be designed to better address and communicate the needs of Part 91. He suggested that a separate review group or committee could be established and tasked with the responsibility of reviewing all PLs in draft phase for application to Part 91.

A group member stated that he thought that as an outflow of the 8900 rewrite work there was to be the establishment of a training module and instructions on how to approve an MEL. He stated he felt this would be a good place for coverage of this topic. Dave Burk stated he gives MEL training to FAA and he gets comments from Inspectors that they do not get trained in detail. It was stated that training is very limited. Greg acknowledged this by stating it is duly noted. He stated they need to study this issue further. He then concluded that Part 91 guidance possibly needs to be identified in a PL. Collin Handcock (EASA) stated EASA has published their own guidance on this issue, sating they divide the listed relief as effective for commercial and/or non-commercial operators.

Workgroup established as follows:
Lead - Dave Burk (Aerodox)

Members:
Todd Schooler (Cessna)
Darrel Sheets (NetJets)
Dean Hartschen (Hawker Beechcraft)
Gene Hartman (AEG LGB)
Nick Petty (Exec. Jet Management)

Action item: Part 91 MMEL Work Group

IG-87: (No attachment)

87-24: Policy Letter Rewrite: New format with FAA branding and incorporate new GC Header

Objective: 1) Adopt new PL format w/FAA branding, and 2) incorporate new GC header.

Item Lead: ATA Mike Bianchi / AFS-260 George Ceffalo/NetJets Darrel Sheets

Discussion: AFS-260 has begun to use a new PL format that improves readability and standardizes the manner in which PLs are authored. This new format should be rolled to existing PLs. In addition, with the release of revised PL-59 (Global Change), PLs designated as GC should incorporate the new header.

IG-81:
Bob Davis stated most GCs are rebranded.

Darrell Sheets to provide updated PL-59 draft at next MMEL IG meeting.

IG-82:
See PL-59 R4 latest draft.

Lead assignment moved from Darrel Sheets (NetJets) to Greg Janosik (AFS 240). Darrel stated he is OK with the Lead assignment being changed to FAA but he wants to be still be engaged in the process.

Bob Davis outlined some of the FAA logic of removing GC headers from PL stating use of GC should be life limited. His example was the relief contained in a 1999 dated PL should by now be incorporated in all MMEL and thus the GC is not longer valid. He stated this and other changes to the GC PL 59 are now listed in a Draft 4.

Discussion was held on effectiveness of the term verbatim as relief often must be applied to various different configurations, different mode of operation.

FAA appeared to leaning in favor of language indicating the PL designated as GC would contain information indicating what GC designation is applicable to a particular Part 91, 135, 121, i.e. a PL designated as GC may only be global only for certain operators.

IG-83:
PL 59 to be reviewed by Greg Janosik (AFS 240) to ensure all comments have been addressed and PL then expected to go final. He stressed that everybody re-read and comment. If no comments received in the next few weeks it will be released as FINAL.

IG-84:

Greg Janosik (AFS 240) stated PL 59 and its comments has been out on web and thus far no additional comments have been received and thus he wants to move this forward. Clarification was requested of what was the nature of this change and Greg presented draft on screen and showed the changes he has incorporated. Discussion pursued regarding changes such as removal of old GC headers, adding dates to GC headers and addition of expiration time limit on GC headers of four years.

87-24: Policy Letter Rewrite: New format with FAA branding (Continued)

Topic of type of header was discussed regarding the addition of wording ".verbatim" or ".verbatim, or using equivalent terminology" was held. It was questioned if this meant two different type of header could exist, one where the AEG determines operator must apply GC PL proviso language verbatim and other where AEG approves the operator to use equivalent terminology. Greg stated that this comment had been accounted in current draft. Current draft status was questioned. Draft 5 is the current version.

He stated that he will give this two more weeks for comment before moving to final.

Item remains OPEN.

IG 85: (No attachment)

Note - Copy of PL was not available to include in agenda – PL 59 R4 had not gone final as of 12/15/11, and R59 R4 Draft 6 had been removed from FSIMS.

Greg Janosik (AFS 260) stated there have been twelve PLs that have had GC statue assigned for five years or more the recommendation is to cancel the headings. Of the twelve seven PLs were actually under draft and are subject to be released with old GC header removed. Of the remaining five or twelve, they removed the headers posted the five for comment, received no comments and thus those five are currently in coordination for signature release.

ITEM CLOSED

IG 86: (Ref. PL 59 R4 D7 and PL 59 R4 D7 Comments)

Item remains on agenda. As of 03-22-12 a draft 7 of PL 59 R4 remained posted with comments due by 03-30-12.

Greg Janosik (AFS 260) first re-presented a presentation of the 8900.1, Vol 4, Ch. 4 rewrite showing how the chapter has been reduced to four new sections from the current 11 sections and how these new sections reflect effectivity by Part, etc. He stated the new Section 2, the MEL program, now has been updated to expand its effectivity to cover Parts 137 and 142. He outlined the progress of rewrite as having become vastly slowed by the size of comments that had to be addressed. He reported that the document is now undergoing the last informal review before being sent to upper management for the formal review which he characterized as the last step before is goes to the publication contractors who prepare it for final release; when all this will be concluded was left open. Greg presented the timeline of milestones and how dates have become particularly hard to track. The AEG chapter 8, section 2 was reported as being currently undergoing upper management formal review and thus is one step ahead of the Vol 4, Ch. 4 rewrite.

87-24: Policy Letter Rewrite: New format with FAA branding (Continued)

George Ceffalo (AFS 260) stated PL59_R4_D 7 is off the comment board and is in final coordination for approval. He stated only a few PLs are yet to be rebranded with the new standard header and either those are ones that are subject to 8900.1, Vol 4, Ch. 4 rewrite, or ones that have been brought back for further revision based on comments received. Greg stated of this latter group there is only two and hence the rebranding as he sees it is complete. He then stated he felt PL 59 need not to have been re-cycled into final coordination again but some late comments had come in that he was able to incorporate. PL therefore is to be on website for an additional two weeks and then is expected to go final. The comments he incorporated were reviewed on screen.

Action item: Greg Janosik – What is the status of PL 59 R4 D7?

IG 87: (Ref. pl-59_r4_d7 and pl-59_r4_d7_comments)

87-25: Consideration of Options for FAA to Control Global Change Headers

Objective: Determine how to best administer the Global Change Header on MMEL Policy Letters

Item Lead: AFS 260 – George Ceffalo

Discussion: At IG 83 George Ceffalo raised the issue of how FAA HDQ is contemplating administering the Global Change Header on MMEL Policy Letters. He outlined three objectives:

1. Eliminate the GC header off old PLs once the information has been incorporated in all applicable MMELs.
2. Review GCs in year groups to determine if they are still applicable.
3. Make GCs life limited. (George suggested four years, after which GC designation expires.)

When a GC designation is removed from a PL, that PL will be revised and the remark "GC removed" included in the revision history under the PL's DISCUSSION section.

With regard to MMELs that are not updated anymore, the GC will be grandfathered when the MMEL effective date is older than the expiration date of the GC.

He asked the group to consider these options and provide FAA feedback.

IG-84:

Greg Janosik (AFS 240) stated George Ceffalo (AFS 260) had not received any feedback on FAA intent to remove old GC headers as was presented at last IG meeting. It was asked if all MMELs have been evaluated to see if all these GC header PLs information has been incorporated. Greg stated no. Tom Atzert (UAL) asked if he was asking if we, as a group, were supposed have comment directly to fact that we had a presentation? Normally the group excepts a web posting to comment to. Questions were raised as to how group can get a copy of the 62 some PLs that FAA plans to address. George Ceffalo offered to transmit it via e-mail notification. Paul Nordstrom (Boeing) expressed concern that out of production aircraft which no longer receive updated MMEL revisions rely heavily on the GC header to PL to publish relief. Greg stated PL that now have the GC removed will be dated and some form of statement will be applied that states earlier dated GC headed PL may be used (grandfather clause). Paul asked should not this be communicated via revision to PL 59.

Greg stated he understood that when MMELs are revised all outstanding GCs get incorporated. Todd Schooler (Cessna) spoke to how they do not always automatically happen, that often they are excluded intentionally, GC wording is not covering all aircraft types, etc, to warrant automatic inclusion. Greg agreed language needs to go in PL 59. He went on to say they (FAA) see no issue with dating PL and expiring GC headers. He concluded that they are not trying to take away what PLs offer, just better manage the system.

Item remains OPEN.

87-25: Consideration of Options for FAA to Control Global Change Headers (Continued)

IG-85:

PLs are pending signature release.

Item remains OPEN.

IG-86: (Ref. PLs 101 R2, 95 R2, 85 R3, 67 R4, and 56 R5)

Action item: George Ceffalo (AFS 260)

PLs 101 R2, 85 R3, and 56 R5 include the statement "Revision X omits the Global Change (GC) designation for this PL. If the MMEL used by operators as an MEL, or used to create an MMEL has not been revised since 01/01/2000, operators may continue to use PL-XX Rev X in their MEL."

> Bob Taylor (Industry Chair / US Airways) questioned if "used to create an MMEL" instead should read "**used to create an MEL**"? How can an MMEL be used to create an MMEL?

PLs 95 R2 and 67 R4 include the statement "Revision X omits the Global Change (GC) designation for this PL", but omit any statement regarding the MMEL not being revised by a certain date and the operator being permitted to use the PL in their MEL. Was this statement excluded intentionally?

> Bob Taylor questioned why the statement indicating removal of the GC wasn't consistent with the three other PLs identified in the preceding paragraph.

George Ceffalo (AFS 260) clarified that what is meant is that now that GC's are being dated and hence will time expire, if the GC PL has not been incorporated in the MEL and the MMEL has not changed, then they can continue to apply for relief. Greg Janosik clarified that this should be cleaned up, clarified.

Action item: Greg Janosik (AFS 240) – Clean up/clarify the language in question in these 5 PLs.

IG-87: (Ref. PLs 101 R2, 95 R2, 85 R3 & 4, 67 R4, and 56 R5)

87-26: PL-76 ATC Transponders

Objective: Is intent of PL still valid?

Item Lead: Paul Nordstrom Boeing

Discussion: No CFR 14 reference in PL, UPS had installed the system under a test program. ADS B will be required by 2020. Reference CFR 91.225, 91.227.

IG-80:
Tom Atzert and Paul Nordstrom will revise PLs to bring them up to date.

IG-81:
Paul Nordstrom – PL 76 R6 D0 – ADSB Squitter Transmissions – Added second set of provisos regarding establishment of alternate procedures. Also, repair category updated. Boeing has not developed any procedures and defers to the operators. They are actually routing restrictions. AFS 260 will review PL draft with AFS 400 and post for comment. No action on PL-105 at this time.

IG-82:
See pl-076 R6 latest draft.

Paul Nordstrom (Boeing) presented changes to sub-item for ADS-B Squitter Transmission that states if inoperative alternate procedures are used. If an aircraft operates in an airspace environment that requires it then there is no relief, thus alternate relief would be to restrict aircraft to other operating regions. Discussion of what type of ADS-B transmission is being addressed with this sub-item, the higher altitude capable 1090 MHz extended squitter (1090ES) or the universal access transmitter (UAT) which is a less capable, altitude limited system. Thus it was agreed to continue 'tweak' the language. PL-105 removed from this agenda item.

Action item: AFS

Note of interest: Discussion was held on PL 105 which has a similar title as PL 76, ADS-B system. This PL was created for the benefit of UPS who pioneered this equipment that employs CDTI for cockpit presentation. Suggestion was to sunset, archive. Pete Neff, Bob Davis (FAA) both argued in favor of retention as there are programs in development that employ this mode of ADS-B, etc.

IG-83:
PL draft presented and Paul Nordstrom (Boeing) reported that it was not the draft he worked as he added that only alternate procedures are established and used with NOTE that any ADS-B function operates normally may be used. Draft on review had CFR references added. Group comment was that is not the convention. Pete Neff requested the NOTE remain but the CFR reference be removed. Greg Janosik (AFS 240) stated the reference can be moved to the PL 25 appendix A which provides lists of applicable FAR per MMEL item(s). Bob asked Paul to forward his original draft back to committee. Once corrected version (one without CFR references) is received it can be posted with the intent of going FINAL.

87-26: PL-76 ATC Transponders (Continued)

As a follow on discussion it was noted that draft on post also had the GC header struck thru indicating deletion. Paul stated his draft did not have this struck. He asked if FAA had determined if this PL does not warrant GC. Again no feedback on by whom or how change got into posted draft? General discussion of GC was held and it was finally decided GC header to this PL would be OK. Paul to submit draft again with retention of GC and removal of CFR references already agreed.
Item remains OPEN.

IG-84:

Greg Janosik (AFS 240) stated PL 76 is posted and provided no comments are received it will go final.

Discussion was held on somewhat related PL 105 ADS-B. This was discussed as being a propriety PL strictly for benefit of UPS and is not representative of existing ADS-B now deployed. Pete Neff stated FAA intends to roll out a completely new ADS-B PL. He states this one, PL 105, needs to be disposed of; however the industry feel 105 is still appropriate. Tom Atzert (UAL) stated it has been published in several MMELs and has thus been employed in a limited capacity. Pete outlined how new PL will also address pending rollout of ADS-B IN as well as OUT function.
Item remains OPEN for confirmation PL 76 went final.

IG 85: (No attachment)
Note - Copy of PL was not available to include in agenda – PL 76 R6 D1 had not gone final as of 12/15/11, and Draft had been removed from FSIMS.

Greg Janosik (AFS 240) stated PL 76 contained extended squitter (ADS-B), which came under objection with AFS 201 while being routed thru FAA internal coordination. Greg said he removed it and placed it in PL 105, the ADS-B policy letter which is being re-written and coordinated with AFS 400 but was not yet ready for posting for comment. John McCormick (FDX) stated extended squitter was a sub-item of the ATC transponder because it is a function of the transmitter, plus PL 105 is, as currently written, designed to apply only to a propriety system. Greg stated that PL 105 as re-written is now representative of ADS-B for all operators. Pete Neff (AFS 240) expanded upon Greg's statement that PL 105 is to be re-written by mentioning some of the future growth issues related to ADS-B. Greg stressed that the current PL did not support the current or future use of ADS-B. John McCormick asked if the PL will be a global change PL. Greg and Pete stated they assumed it will be once released.

Action Items: Greg stated PL 76 to be reposted without extended squitter and assuming no comment will go final in a few weeks. New PL 105 will be posted and remain open until next MMEL IG meeting.
Item remains OPEN.

Action Item: Greg Janosik

87-26: PL-76 ATC Transponders (Continued)

IG 86: (No attachments)

As of 03-27-12 PLs 76 R6 D1 and 105 R2 D1 were no longer posted on the draft site; neither had yet gone final.

Paul Nordstom (Boeing) spoke up in favor, support of the PL 76_R6_D1 by first explaining there are two methods by which ADS-B out is going to be transmitted between commercial versus general aviation fleets, the transponder 1090 MHz ES (extended squitter) or Universal Access Transceiver (UAT). He stated to differentiate PL 76 as effective for ES 1090 he has placed three asterisks under the sub-item. He then stated PL 105 should be used to address the other, non-commercial, means of ADS-B-out, use of the UAT. His reasoning was that PL 76 is already addresses the employment of ATC transponder on commercial aircraft and hence the 1090 ES should logically reside it that PL too.

Greg Janosik countered that a transponder with extended squitter enables ADS-B thus extended squitter should be described as part of subject of ADS-B and not merely a function of the transponder. He then concluded that the group needs to decide if they want two separate PLs or just one. He stressed that combining the two into one PL was what he felt is the preferred method as there is a lot more to ADS-B than just extended squitter. Paul responded that as there is different hardware to be used to enable ADS-B there should two PLs. Greg stressed again that he felt that the extended squitter needs to come off the transponder PL and addressed by an ADS-B PL to preclude further confusion between topics. He brought forth the earlier agenda item of Part 91 not being addressed in PL writings as a reason why ABS-D should be the topic of its own PL.

Comment was made to disposition of current PL 105. This was dismissed as not adding to the present state of ADS-B as it supports only a single operators STC'ed system and it needs to be rewritten to fit more 'generic' ADS-B requirements so as to allow for differences in system architectures, etc. Greg stated that in his re-draft of PL 105 he has removed much to STC specific 'stuff' and left only elements that he feels should be on the topic of ADS-B. But he stressed that the PL is far from ready. Tom Atzert (UAL) stated that while PL 105 was originally written to suit another operator's STC, UAL has been able to employ 'bits and pieces' of it for their 747-400. Greg stated if current PL 105 is still fulfilling a purpose then maybe it can stand and he will transfer the more generic information for ADS-B into a new numbered PL. Greg concluded he will evaluate this further.

Action Item: Greg Janosik

IG 87: (No attachment)
Note - Copy of PL 76 R6 D1 was not available to include in agenda – PL 76 R6 D1 had not gone final as of 07/25/12, and Draft had been removed from FSIMS.

87-27: PL-79 Passenger Seat Relief s

Objective: Discuss PL 79

Item Lead: Todd Schooler - Cessna

Discussion:

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

87-28: PL-122 Flight Deck Surveillance Systems

Objective: Allow more flexibility for cargo operations with inoperative flight deck surveillance systems.

Item Lead: Kevin Peters - FedEx

Discussion: Under sub item Viewing Ports Cargo Configuration - modify to allow occupancy of the courier/supernumerary compartment by certain crewmembers.

IG-82:

See PL 122 R1 latest draft.

I, Kevin Peters (FedEx) had requested this be placed on agenda due to confusion at this carrier over the application of this PL to all cargo operations. I had previously provided the chairman with a discussion paper that unfortunately did not get into the final agenda document. This was placed on the overhead for group review. It outlined the different FARs that addresses the Intrusion Resistant Cockpit Doors (IRCD) installation.

The principle one, 121.313, states that a door must exist between the cockpit and passenger compartment and after April 9, 2003 the door must meet the requirement of 25.795 that outlines the requirement of an IRCD. This regulation expressly states it is applicable to passenger only aircraft per sub-part (k) which requires all passenger carrying aircraft to have "a means to monitor from the flight deck side of door the area outside the flight deck..."

Recently an internal audit of the company MEL program questioned why we were not using the PL 122 C category relief for the view port. Our response is that PL 122, based around 121.313, carries D relief as it is not a requirement per FAR for all cargo operations. The auditor cited another FAR, FAR 121.584, that states without distinction of type of aircraft operation that the cockpit door must not be opened in-flight unless ".. an approved audio procedure and an approved visual device.." is used to verify person seeking access to cockpit is not under duress. Thus there is ambiguity within the regulations regarding use of visual view ports.

We evaluated the PL 122 C category relief and have deemed it far to restrictive for all cargo operation. A proposed draft to PL 122 has been submitted to revise the view port C category relief to state when inoperative "only persons who are eligible for access to flight deck by regulation may occupy the courier/supernumerary compartment." We feel this in keeping with our TSA approved security program that is based upon 121.547. Essentially the courier /supernumerary compartment is being treated as extended cockpit space as is done on other freighter aircraft that either have an inoperative door (Airbus 300/310) or 777F that do not have a door between cockpit and supernumerary area.
The FedEx FOM requires "crews to positively identify a returning crew member prior to entry to the cockpit. The procedure utilized is up the flight crew."

Item remains open to clarify regulations governing requirement of viewport on freighter aircraft. All Cargo should have less restrictive relief category.

87-28: PL-122 Flight Deck Surveillance Systems (Continued)

IG-83:

Kevin Peters (FDX) requested this be tabled until next meeting.

Item remains OPEN.

IG-84:

Kevin Peters (FDX) outlined his petition as presented in the agenda above (see minutes of meeting 82). It was agreed that he could submit a draft to PL 122 with justification of how all cargo operators who have elected to operate aircraft with IRCD to have TSA approved CAS qualified airman onboard the aircraft when the door view port is discovered to inoperative.

Action item: Greg Janosik request draft to be vetted with small industry workgroup of Paul Nordstrom (Boeing) and Scott Hofstra (UPS) and then forwarded to him for web posting and comment.

IG-85: (Ref PL 122 R1 D2)

Greg Janosik stated PL 122 is posted and will come off web 10/13/12 and if no comments are received will move into FAA internal coordination.

Item remains OPEN.

Action item: Greg Janosik

IG-86: (Ref. PL 122 R1 GC D2)

As of 03-27-12 PL 122 R1 D2 was no longer on the draft site; nor had it yet gone final.

George Ceffalo (AFS 260) gave explanation of status of PL as follows: As a part of being in FAA internal coordination it came under review by the ARC (aviation rule making committee). Their security specialist raised concerns of what is meant by certain terminology such as supernumerary, courier area, and what is the correct name of area aft the cockpit security door after the security door becomes inoperative. Apparently there is the understanding that this area becomes known as flight deck, or extension of the cockpit yet he or they (ARC, FAA) states while it is believed to have once been in writing they cannot find it in any document today. George stated therefore there is discussion on what terms should be applied. He stressed whatever is decided will then be subject to re-evaluation by Legal.

87-28: PL-122 Flight Deck Surveillance Systems (Continued)

He also stated the appropriateness of who was being asked to be onboard is in question. Per draft proviso approved persons allowed to be onboard are those individuals who are authorized by FAR 121.547. Apparently the security specialist involved has expressed concerns in this regards too. George clarified that they are concerned over how the 121 security program accounts for person permitted to onboard. He stated “was it name specific or title specific” as to how it speaks to people who are considered as supernumeraries. Some follow on discussion ensued on as how and why some cargo aircraft have had security doors installed, and others had not.

Item remains OPEN.

IG-87: (Ref. pl-122_r1gc_d3)

87-29: PL-106 HF Radio Communications MMEL Requirements

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

Item Lead: Scott Hofstra, UPS

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

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

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

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

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

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

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

87-30: Heads Up Display (HUD) and Enhanced Forward Vision (EFVS)

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

Item Lead: FedEx – John McCormick

Discussion:

IG-87: (No attachment)

87-31: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL)

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

Item Lead: Greg Janosik FAA (AFS- 240)

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

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

IG 78:

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

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

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

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

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

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

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

87-31: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

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

The rewrite to create only four new sections:

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

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

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

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

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

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

IG-84:

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

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

87-31: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

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

Item remains OPEN.

IG 85: (Ref 8900 V4 C4 Rewrite Status)

Greg Janosik (AFS 260) started the he gave some erroneous information that the rewrite will be going to Federal Register by end of last month (Dec 2011) as that is now physically impossible to make it even by end of current month (Jan). He gave an update on where the re-write is at, all 4 new sections of Vol 4 / Ch 4 done, industry comments on which is being currently reviewed. He re-stated that documents were originally to go to FAA Document Control Board (DCB) in December. He states this milestone has not been met. He reported before further posting can happen the document must finish it way thru the internal (DCB), comments which have been extensive have to be answered and then back to tech writing contractors for finishing. He now projects contractors finishing final draft as late as Jun/July, Final internal FAA review and then Fed Register posting for comments, response to comments in late summer and published no sooner that Sept 2012 or later time frame

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

Item remains OPEN.

IG 86:

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

Item remains OPEN.

87-31: FSIMS 8900.1 Rewrite Project: Volume 4, Chapter 4 (MEL) (Continued)

IG 87:

87-32: EASA CS-MMEL

Objective: Brief the IG regarding EASA's future implementation of a generic MMEL and what the requirements for manufacturers and operators will be.

Item Lead: Cessna – Todd Schooler

Discussion:

IG-85: (No attachment)

Todd Schooler gave presentation of EASA CS MMEL proposal. He stated it involves the manufacturers as from now on when they apply for an EASA type certification they must also have a CS MMEL too. CS stands for Certificate Specifications for an MMEL that manufacturer owns and EASA approves. All EASA certificated operators regardless of type of aircraft operated must have an MEL. For small single engine type aircraft that currently do not have MMELs they took the published FAA generic single MMEL and modified to fit EASA rules. They then came up with a definition of non complex versus complex aircraft so those operators who are rated as non-complex can use this modified generic MMEL and a specific MMEL must already exist or manufacturer must create for one a complex aircraft. For those aircraft that use the generic MMEL, but which have optional equipment not addressed in the generic MMEL, the manufacturer is charged with the responsibility to issue an MMEL supplement for that specific aircraft type.

He stated that STC holders have to do same as the aircraft manufacturer, build an MMEL supplement for their products. He reported that for those aircraft that use this generic MMEL the manufacturer does not have to produce a procedures manual. Previous EASA specific MMEL relief that used to be known as TGL Leaflet No.26 has been suspended. He reported that this CS MMEL is effective for all in production aircraft types. Effective dates for transition are yet not established but he reported manufacturers will have two years to grandfather everything in or go through the entire type certification process again.

Item remains OPEN.

IG-86: (No attachment)

Collin Hancock (EASA) stated OSD (Operations Specifications Document) and CS MMEL are going thru internal approval with the EASA committee; both should be available by end of the year. He clarified that the OSD is the overall rule change which will mandate EASA CS MMEL for EASA certificated aircraft; he wanted to clarify the minutes of the previous meeting were geared more towards the generic MMEL, and that the CS MMEL is applicable to what he referred to as all complex aircraft, large transport or biz jet categories. Thus the generic MMEL is more equivalent to the individual FAA MMELs than is the CS MMEL. He reported the EASA committee is currently wading thru 200 plus comments on the CS MMEL and will then be tackling the generic MMEL. Greg Janosik asked if FAA participates; Collin said yes but not for some time; Greg ensured FAA will reengage.

Item remains OPEN.

87-32: EASA CS-MMEL (Continued)

IG-87: (No attachment)

87-33: PL-125 Equipment Relief Without Passengers

Objective: Provide two options for each of the eight items:
A.) Flight Crew only onboard, and
B.) Flight Crew and up to 19 persons allowed onboard with certain equipment limitations spelled out.

Item Lead: Bob Taylor – US Airways

Discussion: Present draft PL-125 for discussion.

IG-83:
Bob Taylor outlined background on this item that was originally proposed by America West to allow for carriage of persons onboard a passenger aircraft that was not able to conduct passenger operations but was planned to be used in a cargo only configuration. He stated at a previous IG it was proposed that existing PL be reviewed and updated as needed. He then outlined how PL 125 allows carriage of person other than passenger by listing the appropriate CFRs that allow that, i.e., 121.583, 121.547, 135.85, etc.

Bob went on to explain how after conferring with SEA AEG, Mr. Jim Foster, it had been proposed to break the PL out in descriptive terms of 'crew only' followed by 'crew plus up to 19 persons.' He stated that was where he became involved in PL drafting. He followed on with that after review of the 14 CFRs and taking Jim's concerns into account he broke out the provisos as a thru f. He then outlined how in the left column, item nomenclature field, was a listing of all the items of equipment previously addressed by the PL. He concluded with a request to the group if this breakout was helpful or if the existing PL 125 would suffice.

Group discussion began with issue that as presented it appeared that all provisos, a thru f, would need to be applied to all items. This was countered with the issue that the AEG Chairman would need to 'cherry pick' only the appropriate proviso(s) from the list. It was then outlined on how this approach had already failed. This was followed by re-hash as to why the PL was initially proposed in the first place and how by citing 121.583 were not acceptable.

Finally, it was suggested that to preclude multiple pages needed to show all the equipment items with their respective set of proviso conditions it all could be contained in a table. Bob states he will rework the PL draft and re-submit.

Item remains OPEN.

IG-84:

Chairman, Bob Taylor (US Air), requests this topic be held open until next meeting.

87-33: PL-125 Equipment Relief Without Passengers (Continued)

IG 85: (Ref. PL 125 R1 D1, and Justification for PL 125 R1 D1)

Bob Taylor presented revised draft PL 125_R1 draft and draft justification document that outlined how he had previously combined sub-items of individual pieces of equipment that may be inoperative, plus omitted some previous item as they are adequately addressed in other MMELs that allow passengers to be carried. He then presented a draft PL showing all new sub-items (9 in total) with their new provisos. The first two provisos, a) and b), have been retained from the existing PL; a new c) proviso was added requiring alternate procedures be established and used. Sub-items 2 and 8 have additional proviso(s) added. He outlined each and gave justification which is documented in the accompanying draft justification document.

Paul Nordstrom (Boeing) challenged need for proviso e) on sub-item 2, door slides, as unneeded due to persons to be carried are not passengers. Pete Neff (AFS 240) commented that proviso a) and b) needs to be changed to emphasize that when it states no passengers are carried it actually states carriage is of non-revenue passengers. This was challenged as not standard with authorizing FAR 121.583 which states non-passengers and the desire is stay in sync with FAR language. Bob asked Jim Foster (FAA AEG SEA) if this PL breakout was acceptable to AEG. Jim stated the Policy statement may need more guidance on why the PL is needed. He then concurred with Paul's comment on proviso e) for sub item 2 and it was agreed to strike it. Pete Neff stated since this type of operation will not necessitate the need for flight attendant to be onboard that a statement or policy guidance may need to address how safety briefings are to be accomplished. Bob responded that is purpose of having proviso that alternate procedures are established and used.

Action item: Jim Foster will provide guidance on why the need to break this equipment out for passenger carrying aircraft to Bob Taylor.

Bob Taylor to add the guidance provided by Jim Foster, and to delete proviso e) of sub-item 2 Door Slides, and then forward draft PL to Greg for posting.

IG 86: (Ref. PL 125 R1 D2 [removal of proviso e]; no guidance has yet been provided)

Bob Taylor presented a revised copy of PL 125 R1 D1 showing the deletion of proviso e) in sub-item 2) Door Slides, as was assigned in the action item from IG 85 (Ref. bookmark pl-125_r1_draft 2 2012-01-30 in IG 86 Final Agenda.pdf). Bob had not yet identified the draft as D2 due to the additional guidance previously deemed to be necessary by Jim Foster had not yet been provided by Jim Foster. Jim stated he did not have such as of that moment. Greg asked Jim Foster if he was still OK with draft as it's currently written. Jim expressed some reservation but felt that he could not elaborate. Greg stated he would sidebar with Jim later. Bob Taylor is to identify the Draft as presented as D2 and forward to Greg without Jim's additional guidance.

87-33: PL-125 Equipment Relief Without Passengers (Continued)

Action item: Bob Taylor – Identify changes made to D1 as D2, and forward to Greg
Greg Janosik – Sidebar with Jim Foster

IG 87: (Ref. PL 125 R1 D2)

87-34 PL 102, Cargo Compartment Smoke Detection and Fire Suppression Systems

Objective: To align the language in PL 102 with that of PL 108 R1 regarding the operator's ability to verify cargo compartments contain only empty cargo handling equipment, ballast, and /or Fly Away Kits.

Item Lead: Bob Taylor, US Airways

Discussion:

IG-86:

The DISCUSSION section in PL 108 "Carriage of Empty Cargo Handling Equipment" indicates PL 108 was created to address concerns over previous attempts to clarify that air carriers have the ability to redistribute cargo handling equipment throughout their route structure via the introduction of an MMEL proviso stating "...affected compartment remains empty" and a NOTE stating "does not preclude the carriage of empty cargo containers, pallets, ballast, and cargo restraint components"; concerns were identified as:

- This will not allow them to carry cargo handling equipment because Notes, by their definition, "... do not relieve the operator of the responsibility for compliance with all applicable requirements. This can lead them back to the need to void the entire compartment and once again leave urgently needed ULDs and ballast, etc., at remote locations, disrupting their system, all because the proviso they are left to comply with is essentially "… Affected compartment remains empty."
- Other parties have also expressed concern that this note in MMELs lacks any creditable authority to ensure that inappropriate items associated with cargo handling are not also being loaded.

The POLICY section in PL 108 then addresses these concerns as follows:

> (O) May be inoperative provided procedures are established and used to ensure the associated compartment **or zone** remains empty, or is verified to contain only empty cargo handling equipment, ballast (ballast may be loaded in ULDs), and /or Fly Away Kits.
> NOTE: Operator MELs should define which items are approved for inclusion in the Fly Away Kits, and which materials can be used as ballast.

Bob Taylor pointed out that PL 102 "Cargo Compartment Smoke Detection and Fire Suppression Systems" has never been aligned with the language in PL 108, but continues to use the language reportedly to be the cause of the concerns documented in the PL 108 DISCUSSION section. Bob asked the group if this language should be aligned with PL 108, and the group agreed.

Action item: Bob Taylor – Revise the provisos and notes in PL 102 regarding cargo compartments and the carriage of cargo containers to align with POLICY as defined in PL 108.

IG-87: (No attachment available at distribution of minutes; one will be provided at meeting)

87-35: Guidelines for the Introduction of New Business

Objective: To clarify guidance in the FAA/ATA MMEL INDUSTRY GROUP CHARTER regarding the introduction of new items.

Item Lead: MMEL IG Chairman

Discussion: Propose revising par. D. under item 7 MMEL IG Meeting Agenda in the IG Charter

IG-85: (Reference Guidelines for Introduction of New Business)

Bob Taylor presented MMEL IG Charter document inclusion of revised text on how to formally submit new MMEL IG Agenda items for inclusion in the agenda package. He stated the proposed changes can be found in the pdf version of the meeting agenda with existing text in red and proposed change text in blue, and he encourages members to review it and e-mail him with any feedback. (Ref: Agenda attachment).

IG 86: (No attachment)

Bob Taylor (Industry Chair / US Airways) indicated no feedback had been received from the IG members; he will update the MMEL IG Charter to include the guidelines formerly proposed at IG 85.

Action item: Bob Taylor – Update the FAA/ATA MMEL INDUSTRY GROUP CHARTER regarding the introduction of new items accordingly

IG 87: (No attachment)

87-36: FAA / EASA MMEL Harmonization

Objective: Monitor the status of FAA/EASA Harmonization initiatives regarding MMELs.

Item Lead: Greg Janosik (FAA AFS 240) and Colin Hancock (EASA)

Discussion: FAA MMEL Procedures Manual discussed at IG 60. AEG SEA and AFS 260 will review the FAA MMEL Procedures Manual and report back to the IG.
IG requests this manual be formally accepted as FAA policy.

IG-78:
Emilie Marchais from EASA stated no updates because of cancellation of a meeting in Europe due to travel problems associated with recent volcanic activity.

IG-79:
Pete Neff updated the group that the EASA MMEL policy document will be made available on the EASA website around April 2011.

IG-80:
Pete Neff reported EASA is currently re-writing their regulations -certification specification (CSMMEL). April 2011, rule should be out for comment. April 2012, rule should go final. EASA MMELs are OEM owned and managed where as FAA MMELs are FAA owned and managed.

IG-81:
Jim Foster was not in attendance, but Thierry Vandendorpe updated the IG on EASA. He stated they are developing certification specification by choice, very similar to FAA policy letter guidance. The CS MMEL will be the responsibility of the OEM, not EASA.

In US, FAA is responsible for the MMEL.

IG-82:
Jim Foster (AEG SEA) had no updates to report. Colin Hancock (EASA) spoke to development of EASA MMELs. He stated the draft document on the topic will be posted to EASA website for public comment within the next two weeks.

FAA Lead was transferred to Pete Neff (AFS 202) from Mr. Foster (FAA SEA AEG). Pete spoke to the differences in the FAA, EASA rules and procedures. He stated both parties have compared their individual rules have come to agreements in some areas thus narrowing the differences where disagreement still exist. Perrick Pene (Airbus) stated how as a manufacturer they, Airbus, cannot build or support two different standards.

Overall good progress has been achieved and further meetings are planned.

87-36: FAA / EASA MMEL Harmonization (Continued)

IG-83:

Emilie Marchais (EASA) reported that very soon, I believe she stated by the end of this week (19 August 2011), that the details on Certification Specification MMEL (CS-MMEL) will posted on the EASA website as Notice of Proposed Amendment (NPA) No. 2011-11 document. This document provides the details on how manufacturers are to use certification standards, statistical analysis tools, to develop an aircraft MMEL. This is supposed to become effective in the September timeframe. Todd Schooler (Cessna) interjected that these MMELs were to be just developed and maintained but owned by the manufacturer, not EASA. To this Emilie concurred.

For further information, please refer to attachment "CS-MMEL.pdf" which outlines the certification specifications, acceptable means of compliance and guidance material related to development of an EASA MMEL. (This is the content of NPA No. 2011-11 document referenced above).

IG-84:

Pete Neff (AFS 240) stated how Thierry Vandertroppe (EASA) had already outlined the EASA MMEL must be developed and maintained by the manufacturer and EASA maintains approval over content of MMEL. He also mentioned how EASA has published (stated) that an approved MMEL constitutes a temporary change of type design. He when on to describe a series of meetings held on international Flight Ops Evaluation Board (FOEB) process. These meeting have been attended by five international regulatory agencies representing, US, EU, Canada, Brazil and China; all five are trying to come up with a harmonized process for joint FOEBs.

Paul Nordstrom (Boeing) asked that if Airbus has stopped producing section three data and was requiring use of the AMM, then where do operators publish their (M) procedures, in the MEL, or in a separate document, or reference the AMM? Bob Taylor indicated US Airways sometimes utilizes AMM Task references, and sometimes utilizes the Airbus MMP, which he described as a 'sort of section three', that allows them (US Airways) to continue to place a procedure within the MEL. Tim Kane (Jet Blue) spoke to his preference to using the MEL too. Paul then asked how reactivation is addressed. Tim stated MEL does not address this; operator uses AMM R&R procedures, etc. Mike Bianchi (ATA) reported that in his experience many operators publish how to sign off an MEL in their GMM MEL program.

IG-85:

EASA representatives were not present thus item held over until next meeting. Discussion was held on one EASA development, implementation of CS MMEL (refer to agenda item 85-30).

IG-86: (No attachment)

No updates for this meeting. Item remains OPEN.

87-36: FAA / EASA MMEL Harmonization (Continued)

IG-87: (No attachment)

87-37: PL-31 MMEL Format Specifications – "Next-Gen" MMEL Specs

Objective: Align PL-31 with new XML MMEL product.

Item Lead: Walt Hutchings, MKC AEG

Discussion:

IG-78:
Steve Kane briefed the group on the movement of all PL's to FSIMS site by the end to the year. Web view will be very similar to what is seen today for PL's on the OPSPECS web site.

IG-79:
XML schema is in OKC (ATA spec 2300). Final schemas to be published in about 2 months.

IG-80:
Walt not in attendance, Bryan Watson stated that Walt is trying to push IT for a "go" date.

IG-81:
Walt Hutchings was not in attendance, no update.

IG-82:
FAA representative present stated some general agreement on new schema has been reached with AEG but actual details could not be outline as Lead, Walt Hutching not present. Group general discussion was held on various schemas have been hatched by different entities, Boeing DDG as one, the above referenced ATA scheme another. It was stated that there are several other similar projects such MMEL numbering schema that fall in this same arena, different approaches being pursued. Jim Foster (AEG SEA) stated he recently spoke to Walt and was informed that the progress is in limbo due to FAA budget cuts.

IG-83:
Walt Hutching has reported to Greg Janosik (AFS 240) that the project is on hold due to FAA funding issue.

IG-84:
Greg Janosik (AFS 240) reconfirmed that this subject is in abeyance due to lack of FAA funding.

IG-85:
On hold, FAA Funding issues. - Item remains OPEN.

IG-86:
On hold, FAA Funding issues. - Item remains OPEN.

IG-87: (No attachment)

87-38: Conversion of FAA MMEL Documents to XML (MMEL Transformation)

Objective: To streamline the process of formatting MMELs to upload on FAA server.

Item Leads: Bob Davis AFS-260

Discussion: Working Group formed to develop MMEL XML schema. Group is to report progress at each IG meeting.

IG-78:
Walt Hutchings reports that operator MEL compliance tracking and reporting functionality has been tested and soon to be deployed. Notice that will go out to field offices has been written, and is awaiting final coordination before sending out. AEG authoring/publication tools about two thirds complete.

IG-79:
Mr. Paul Conn from ATA spoke to the group about work being done with XML schemas as they relate to ATA Spec 2300. FOIG group schema is set and should be released within several months.

IG-80:
Pete Neff stated that meetings are ongoing in DC and an update is likely at next IG meeting.

IG-81:
Bob Davis – This is still in work and will likely occur in 2012. Paul Nordstrom stated that there are two different MMEL "word templates' out there for use and was expecting to see one eventually.

Other thoughts included discussion about Spec 2300 Schema (is completed) and Boeing, Airbus and FAAs need to eventually synch up.

IG-82:
Similar discussion as that held on previous agenda item 82-13. Lead Walt Hutchings not present. Program on hold due to budget constraints.

IG-83:
Project is on hold due to FAA funding issue.

IG-84:

Greg Janosik (AFS 240) reconfirmed that this subject is in abeyance due to lack of FAA funding.

IG-85:
On hold, FAA Funding issues. - Item remains OPEN.

IG-86:
On hold, FAA Funding issues. - Item remains OPEN.

IG-87: (No attachment)

87-39: New MMEL Proposal System

Objective: Volunteers needed to submit MMEL items through a new MMEL proposal program.

Item Lead: Walt Hutchings

Discussion:

IG-80:
Walt not in attendance, Bryan Watson stated that Walt is trying to push IT for a "go" date.

IG-81:
Walt Hutchings not in attendance updates deferred to next IG meeting.

IG-82:
No updates.

IG-83:
This item to remain OPEN. FAA funding issue.

IG-84:
No change – Greg Janosik to check if any updates are available regarding the funding issue

IG-85:
On hold, FAA Funding issues. - Item remains OPEN.

IG-86:
On hold, FAA Funding issues. - Item remains OPEN.

IG-87: (No attachment)

87-40: ATA MMEL/MEL Value to Industry Survey

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

Item Lead: Mike Bianchi/ATA

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

IG-82:

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

IG-83:
ATA representative not present.

Item remains OPEN.

IG-84:

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

Item remains OPEN.

IG-85:

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

Item remains OPEN.

Action item: Mike Bianchi, A4A

87-40: ATA MMEL/MEL Value to Industry Survey (Continued)

IG-86: (No attachment)

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

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

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

IG-87: (No attachment)

Maintaining Aircraft Accessibility Features Required by CFR Part 382

(Nondiscrimination On The Basis Of Disability In Air Travel)

and

Similar Features in Non-accessible Lavatories

Part 382 requires a carrier –
To PROVIDE aircraft with accessibility features

Part 382 – NONDISCRIMINATION ON THE BASIS OF DISABILITY IN AIR TRAVEL

382.1 What is the purpose of this part?

The purpose of this Part is to carry out the Air Carrier Access Act of 1986, as amended. This rule prohibits both U.S. and foreign carriers from discriminating against passengers on the basis of disability; requires carriers to make aircraft, other facilities, and services accessible; and requires carriers to take steps to accommodate passengers with a disability.

Subpart E – Accessibility of Aircraft

§ 382.63 What are the requirements for accessible lavatories?

(a) As a carrier, you must ensure that aircraft with more than one aisle in which lavatories are provided shall include at least one accessible lavatory.

(3) The lavatory shall provide door locks, accessible call buttons, grab bars, faucets and other controls, and dispensers usable by qualified individuals with a disability, including wheelchair users and persons with manual impairments.

§ 382.71 What other aircraft accessibility requirements apply to carriers?

(a) As a carrier, you must maintain all aircraft accessibility features in proper working order.

Part 382 requires a carrier –
To PROVIDE aircraft with accessibility features
To MAINTAIN accessibility features in proper working order

Part 382 – NONDISCRIMINATION ON THE BASIS OF DISABILITY IN AIR TRAVEL

382.1 What is the purpose of this part?

The purpose of this Part is to carry out the Air Carrier Access Act of 1986, as amended. This rule prohibits both U.S. and foreign carriers from discriminating against passengers on the basis of disability; requires carriers to make aircraft, other facilities, and services accessible; and requires carriers to take steps to accommodate passengers with a disability.

Subpart E – Accessibility of Aircraft

§ 382.63 What are the requirements for accessible lavatories?

(a) As a carrier, you must ensure that aircraft with more than one aisle in which lavatories are provided shall include at least one accessible lavatory.

(3) The lavatory shall provide door locks, accessible call buttons, grab bars, faucets and other controls, and dispensers usable by qualified individuals with a disability, including wheelchair users and persons with manual impairments.

§ 382.71 What other aircraft accessibility requirements apply to carriers?

(a) As a carrier, you must maintain all aircraft accessibility features in proper working order.

PROVIDE - MAINTAIN

- A carrier PROVIDEs aircraft with accessibility features via the modification of existing aircraft or the introduction of new aircraft.

PROVIDE - MAINTAIN

- A carrier PROVIDEs aircraft with accessibility features via the modification of existing aircraft or the introduction of new aircraft.

- A carrier MAINTAINs its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

D072 requires the certificate holder (the operator) to MAINTAIN the aircraft in accordance with the Continuous Airworthiness Maintenance Program (CAMP) included in the certificate holders manual

U.S. Department of Transportation
Federal Aviation Administration

Operations Specifications

D072 . Aircraft Maintenance - Continuous Airworthiness Maintenance Program (CAMP) Authorization.

HQ Control: 09/27/2005
HQ Revision: 01b

a. The certificate holder is authorized to conduct operations under 14 CFR Part 121 of the Federal Aviation Regulations using the aircraft identified in the certificate holder's aircraft listing provided the following conditions are met.

b. Each aircraft listed in the table below is authorized for use and shall be maintained in accordance with the continuous airworthiness maintenance program and limitations specified in these operations specifications.

c. The continuous airworthiness maintenance program must be sufficiently comprehensive in scope and detail to fulfill its responsibility to maintain the aircraft in an airworthy condition in accordance with applicable Federal Aviation Regulations and standards prescribed and approved by the Administrator. The program shall be included in the certificate holder's manual.

The operator's manual (e.g. the MPPM in this case) provides the company's methods to MAINTAIN aircraft in compliance with the requirements of Operations Specification D072.

U·S AIRWAYS **Interoffice Correspondence**

Date: October 1, 2008

To: Whom it may concern

From: Senior Vice President – Technical Services

Subject: Compliance with 14 CFR Parts 119 and 121

The purpose of the Maintenance Policies and Procedures Manual (MPPM) is to provide information relative to the general policy, organization and administration of the Technical Operation Division, and to provide methods, techniques and responsibility for maintenance of aircraft and components.

The MPPM and any documents contained herein reflect US Airways' method of compliance with 14 code of Federal Regulations (CFR) Parts 119 and 121, and Operations Specification D072. Subsequently, it is the responsibility of all maintenance employees to adhere to the policies and procedures set forth in the MPPM.

Part of the operator's CAMP to MAINTAIN the aircraft provides for managing the deferral and subsequent repair of inoperative equipment via the MEL; e.g. -

MPPM Release 59.0 - 02/01/12

Go Up One Level

SUBJECT 53-01-05 INSTALLATION AND REMOVAL OF MELS AND CDLS

1. INTRODUCTION

   A. This section includes the policy and procedures for managing the MEL and CDL from an operational perspective. Included are procedures for installing a new MEL or CDL in a US Airways manned Maintenance Station, installing a new MEL or CDL in a non-US Airways manned Maintenance Station, procedures when SCEPTRE is not operational, closing an existing MEL or CDL and following up on an existing MEL or CDL. This section does not include managing the MEL document itself or tracking MELs and CDLs.

Similarly, an operator's CAMP to MAINTAIN the aircraft also provides for managing the deferral and subsequent repair of inoperative Nonessential Equipment & Furnishings via the NEF Program; e.g. -

NPPM | Release 60.0 - 03/01/12

Go Up One Level

SUBJECT 53-03-10 NON-ESSENTIAL EQUIPMENT AND FURNISHINGS (NEF) POLICY AND PROCEDURE DEFERRED MAINTENANCE

• FAA APPROVED SECTION •

1. INTRODUCTION

A. The NEF Program addresses deferral of Non-Essential Equipment and Furnishings (NEF). The NEF Program is part of the Minimum Equipment List (MEL) Program and is under the authority of the FAA Approved MEL.

B. Identified NEF items must meet the following criteria:

(1) NEF items are installed on the aircraft as part of the original type certification, supplemental type certificate or other forms of alteration that have no effect on the safe operation of flight and would not be required by the applicable certification rules or operational rules.

(2) NEF items if inoperative, damaged or missing, have no effect on the aircraft's ability to be operated safely under all operational conditions. NEF items must not be in a condition that potentially affects the safety of passengers, crew, and/or service personnel.

(3) NEF items may be installed in areas including, but not limited to, the passenger compartment, flight deck area, service areas, cargo areas, lavatories and galley areas.

(4) NEF items are not items already identified in the MEL or CDL of the applicable aircraft. They do not include items that are functionally required to meet the certificaton rule or for compliance with any operational rule.

(5) NEF items shall not provide for deferral of items having prescribed serviceable limits as identified in the manufacturer's maintenance manual or Company's approved maintenance program. Examples are: wear limits, fuel/hydraulic leak rates, oil consumption, etc.

(6) Approved NEF deferrals include:

(a) Items that are listed in the FAA approved Non-Essential Furnishings and Equipment List (NEFL).

(b) Items that have been recorded in the MOC NEF Lotus Notes database as approved by the FAA and have not yet been published to a revised NEF List.

(c) Items that have been reviewed by MOC using the NEF Decision Guide and have been determined to meet the NEF program guidelines and that have been recorded in Lotus Notes NEF database and forwarded to the FAA CMO for review and approval.

§ 382.71 What other aircraft accessibility requirements apply to carriers?

(a) As a carrier, you must maintain all aircraft accessibility features in proper working order.

Managing the deferral and repair of CFR 382 required items via an operator's MEL and/or NEF Program fulfills the requirements of CFR 382 to MAINTAIN these items.

Title 14 CFR 121.628 provides the basis for deferral per an MEL.

- An approved MEL must exist (approved by the FAA Certificate Management Office) plus
- The FAA Certificate Management Office must have issued Operations Specifications authorizing use of the MEL

§ 121.628 Inoperable instruments and equipment.

(a) No person may take off an airplane with inoperable instruments or equipment installed unless the following conditions are met:

(1) An approved Minimum Equipment List exists for that airplane.

(2) The certificate-holding district office has issued the certificate holder operations specifications authorizing operations in accordance with an approved Minimum Equipment List. The flight crew shall have direct access at all times prior to flight to all of the information contained in the approved Minimum Equipment List through printed or other means approved by the Administrator in the certificate holders operations specifications. An approved Minimum Equipment List, as authorized by the operations specifications, constitutes an approved change to the type design without requiring recertification.

Operations Specification D095 authorizes using an MEL, e.g.

D095 . Minimum Equipment List (MEL) Authorization **HQ Control: 08/15/1997**
HQ Revision: 020

The certificate holder is authorized to use an approved Minimum Equipment List (MEL) provided the conditions and limitations of this paragraph are met. The certificate holder shall not use an MEL for any aircraft that is not specifically authorized by this paragraph.

- "The certificate holder is authorized to use an approved Minimum Equipment List (MEL) provided the conditions and limitations of this paragraph are met."
- "Except as provided in subparagraph d, the certificate holder shall have items repaired within the time intervals" identified as Repair Intervals A (as specified in MMEL), B (3 days), C (10 days) & D (120 days).
- "The certificate holder shall develop and maintain a comprehensive program for managing the repair of items listed in the approved MEL."

The combination of an approved MEL plus the authorization to use it constitutes an approved change to the type design of the aircraft without requiring recertification.

§ 121.628 Inoperable instruments and equipment.

(a) No person may take off an airplane with inoperable instruments or equipment installed unless the following conditions are met:

(1) An approved Minimum Equipment List exists for that airplane.

(2) The certificate-holding district office has issued the certificate holder operations specifications authorizing operations in accordance with an approved Minimum Equipment List. The flight crew shall have direct access at all times prior to flight to all of the information contained in the approved Minimum Equipment List through printed or other means approved by the Administrator in the certificate holders operations specifications. An approved Minimum Equipment List, as authorized by the operations specifications, constitutes an approved change to the type design without requiring recertification.

The FAA MMEL provides the basis for deferral of Non-essential Equipment and Furnishings per an Operator's NEF Program.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

MASTER MINIMUM EQUIPMENT LIST

AIRCRAFT: BOEING B-787	REVISION NO: 2 DATE: 01/25/2012	PAGE: 25-1

1. SYSTEM & SEQUENCE NUMBERS / ITEM	2. NUMBER INSTALLED	3. NUMBER REQUIRED FOR DISPATCH	4. REMARKS OR EXCEPTIONS
25 EQUIPMENT/FURNISHINGS			
-00-01 *** Non-Essential Equipment and Furnishings (NEF)	-	0	May be inoperative, damaged or missing provided that the item(s) is deferred in accordance with the operator's NEF deferral program. The NEF program, procedures and processes must be outlined in the operator's appropriate document. (M) and (O) procedures, if required, must be available to the flight crew and included in the operator's appropriate document. NOTE: Exterior lavatory door ash trays are not considered NEF items.

The Operator's MEL Program includes multiple methods of control; e.g.-

Unique MEL Number for each method of deferral
Unique Control Number for managing the repair of each deferred item
Logging of each deferred item within the Aircraft Maintenance Record

(continued next slide)

The following instructions are for completing the MEL/CDL (US-0101) and MEL-FR (US-0102) Placards.

NUMBER	ITEM / STEP / ACTION
1	Enter MEL or CDL Item Number as shown in MEL or CDL document.
2	Enter condition number of the specific MEL or CDL condition you are applying.
3	Enter aircraft number.
4	Enter current station local date.
5	Enter current station for the aircraft.
6	Enter control number given by MOC.
7	Enter FDML page number where discrepancy that caused the MEL is logged on.
8	Enter remarks as instructed in MEL or CDL document.
9	Signature of Mechanic applying the MEL or CDL.
10	Enter employee number.

Continued…

The Operator's MEL Program includes multiple methods of control; e.g.-

Multiple department review concerning initial deferral requirements
Tracking aircraft status changes (when applicable)
Coordination of repetitive maintenance action (when applicable)

(1) **Mechanic**

(a) Troubleshoot the malfunction and correct the item if possible.

(b) If unable to correct the problem within aircraft downtime, determine from the aircraft MEL document if the malfunction can be deferred using a MEL or CDL deferral.

(c) Contact an MOC Technician and request the malfunction be placed on MEL or CDL deferral as appropriate. Review, with the MOC Technician, the discrepancy and the MEL/CDL to ensure the correct MEL/CDL is being applied.

(2) **MOC Technician**

(a) Review appropriate aircraft system history.

(b) Contact Dispatch before applying any MEL or CDL that has a flight planning impact such as weather or weight restrictions.

(c) Assure the Mechanic has completed all required actions prior to issuing an MEL or CDL.

(d) Notify Dispatch (may be electronic notification) of applied MEL or CDL with all the required data.

(e) Notify System Customer Service Manager (SCSM) with information pertaining to inoperative passenger seats or entire inoperative potable waters systems.

(f) MEL or CDL deferrals requiring follow-up actions will be logged on the MOC Follow-up/Repetitive Inspection Tracking Log (MC-0002). Reference MPPM 35-00-30 .

(g) Notify all downline stations of any incoming inspection or maintenance requirements associated with MEL or CDL deferrals until items are closed.

(h) MEL or CDL deferrals requiring aircraft status changes to CAT, RVSM, ETOPS or EOW will require a PLA Placard to be issued by MOC Technician. Reference MPPM 53-02-10 .

An Operator's NEF Program also includes similar methods of control; e.g.-

Multiple department review concerning initial deferral requirements
Unique NEF Number for each method of deferral
Unique Control Number for managing the repair of each deferred item
Logging of each NEF item within the Aircraft Maintenance Record

(1) **Mechanic or Flight Crew**

(a) Contacts Maintenance Control Technician with the discrepancy that the mechanic believes to be a possible NEF deferral.

(2) **Maintenance Control Technician**

(a) Reviews the NEF List for an entry that matches the discrepancy. If no matching entry is found on the NEF List then:

1 Performs a search of the MOC NEF Database (Lotus Notes) for a matching item that has been approved by the FAA and not yet published on the NEFL.

2 If an Approved NEF is found the Technician supplies the Mechanic or Flight Crew with the Approved NEF Reference number found in Lotus Notes NEF database to be included in the logbook deferral corrective action entry.

(Example below)

3 If no Approved NEF is found, the Technician reviews Lotus Notes "Disapproved NEF Deferral Requests" section to ensure requested item was not previously disapproved. If the discrepancy was found to be previously "Disapproved" the item must be either fixed before departure or deferred by a method other than NEF, such as EA and MON or MEL the next higher assembly.

4 If neither an Approved or Disapproved NEF is found the MOC Technician utilizes the NEF Decision Guide (Reference MOC DPM CH 5) to approve/disapprove the NEF deferral request.

5 Discrepancies that meet the guidelines of the NEF Decision Guide will be recorded and approved in the MOC Lotus Notes NEF Database.

6 If the Technician approves a new NEF, the Technician supplies the Mechanic or Flight Crew with the Lotus Notes NEF Reference number and the NEF Control Number to be included in the logbook deferral corrective action entry.

(Example below)

(3) **Mechanic or Flight Crew**

(a) Makes the appropriate NEF deferral entry in the FDML similar to the example below.

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- **Many of these same features are duplicated, or similar equipment is installed, in non-handicapped accessible lavatories, i.e. door locks, call buttons, grab bars, faucets and other controls, and dispensers.**

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- Many of these same features are duplicated, or similar equipment is installed, in non-handicapped accessible lavatories, i.e. door locks, call buttons, grab bars, faucets and other controls, and dispensers.

➡ **Aircraft with handicapped accessible lavatories are also equipped with non-handicapped accessible lavatories; both types of lavatories can be installed in close proximity to each other.**

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- Many of these same features are duplicated, or similar equipment is installed, in non-handicapped accessible lavatories, i.e. door locks, call buttons, grab bars, faucets and other controls, and dispensers.
- Aircraft with handicapped accessible lavatories are also equipped with non-handicapped accessible lavatories; both types of lavatories can be installed in close proximity to each other.

➡ **Requiring an Operator to address the deferral of similar or like features in lavatories located next to each other under two different Programs as is currently implied by PLs 116 (NEF Program) and 128 (Wheelchair Accessible Lavs) only introduces the possibility to incorrectly defer one or more features under the wrong program; it does not contribute to the Operator MAINTAINing these items.**

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- The ability for an operator to utilize a standard procedure for advising its flight crewmembers and concerned maintenance personnel when a flight is to depart with certain features deferred (handicapped accessible or non-accessible) along with the conditions and limitations that apply enhances the Operator's ability to comply with the requirement to MAINTAIN these items.

The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- The ability for an operator to utilize a standard procedure for advising its flight crewmembers and concerned maintenance personnel when a flight is to depart with certain features deferred (handicapped accessible or non-accessible) along with the conditions and limitations that apply enhances the Operator's ability to comply with the requirement to MAINTAIN these items.

➡ Similar precedent is already established by FAA MMEL Policy Letter 81 which clarifies that an operator may elect to apply Configuration Deviation Lists (CDL) procedures in the same manner as established for the operator's MEL procedures for informing the flight crew and other appropriate personnel of the equipment items and limitations associated with missing equipment (even though the AFM CDL may imply otherwise).

SUMMARY

- The Operator's MEL and NEF Programs both provide an acceptable method by which to MAINTAIN its aircraft with accessibility features per the requirements of US DOT/FAA Operations Specifications D072.

- The Operator's ability to utilize STANDARD PROCEDURES associated with its NEF Program, or its MEL Program, or a combination of both Programs contributes to successfully MAINTAINing features in both handicapped and non-handicapped lavatories.

- Delete/revise PL 128 as necessary to permit Operator's to address the requirement to MAINTAIN their aircraft using STANDARD PROCEDURES.

[Federal Register Volume 77, Number 35 (Wednesday, February 22, 2012)]
[Rules and Regulations]
[Pages 10352-10355]
From the Federal Register Online via the Government Printing Office [www.gpo.gov]
[FR Doc No: 2012-3973]

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

14 CFR Part 39

[Docket No. FAA-2010-0956; Directorate Identifier 2010-NM-018-AD; Amendment 39-16951; AD 74-08-09 R3]

RIN 2120-AA64

Airworthiness Directives; Various Transport Category Airplanes

AGENCY: Federal Aviation Administration (FAA), DOT.

ACTION: Final rule.

SUMMARY: We are revising an existing airworthiness directive (AD) for transport category airplanes that have one or more lavatories equipped with paper or linen waste receptacles. That AD currently requires installation of placards prohibiting smoking in the lavatory and disposal of cigarettes in the lavatory waste receptacles; establishment of a procedure to announce to airplane occupants that smoking is prohibited in the lavatories; installation of ashtrays at certain locations; and repetitive inspections to ensure that lavatory waste receptacle doors operate correctly. This new AD extends the time an airplane may be operated with certain missing ashtrays. This AD was prompted by the determination that certain compliance times required by the existing AD could be extended and still address fires occurring in lavatories caused by, among other things, the improper disposal of smoking materials in lavatory waste receptacles. We are issuing this AD to correct this unsafe condition on these products.

DATES: This AD is effective March 28, 2012.

Examining the AD Docket

You may examine the AD docket on the Internet at http://www.regulations.gov; or in person at the Docket Management Facility between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays. The AD docket contains this AD, the regulatory evaluation, any comments received, and other information. The address for the Docket Office (phone: 800-647-5527) is Document Management Facility, U.S. Department of Transportation, Docket Operations, M-30, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue SE., Washington, DC 20590.

FOR FURTHER INFORMATION CONTACT: Alan Sinclair, Aerospace Engineer, Airframe/Cabin Safety Branch, ANM-115, Transport Airplane Directorate, FAA, 1601 Lind Avenue SW., Renton, Washington 98057-3356; phone: 425-227-2195; fax: 425-227-1232.

SUPPLEMENTARY INFORMATION:

Discussion

We issued a notice of proposed rulemaking (NPRM) to amend 14 CFR part 39 to revise AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996). That AD applies to the specified products. The NPRM published in the Federal Register on October 6, 2010 (75 FR 61657). That NPRM proposed to continue to require installation of placards prohibiting smoking in the lavatory and disposal of cigarettes in the lavatory waste receptacles; establishment of a procedure to announce to airplane occupants that smoking is prohibited in the lavatories; installation of ashtrays at certain locations; and repetitive inspections to ensure that lavatory waste receptacle doors operate correctly. That NPRM also proposed to extend the time an airplane may be operated with certain missing ashtrays.

Comments

We gave the public the opportunity to participate in developing this AD. The following presents the comments received on the NPRM (75 FR 61657, October 6, 2010) proposal and the FAA's response to each comment.

Support for the NPRM

Air Line Pilots Association, International (ALPA), Boeing, and Air Transport Association (ATA) supported the intent of the NPRM (75 FR 61657, October 6, 2010).

Request to Credit MPD Task Cards

MNG Airlines reported that some airplane manufacturers' maintenance planning documents (MPDs) include the requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996), in a task card, which the operators add to their own MPDs for their fleet. The commenter requested that we revise the NPRM (75 FR 61657, October 6, 2010) by indicating that, if a manufacturer's and operator's MPDs cover a task card, the AD requirements are automatically satisfied.

We disagree with the request. Operators determine how to track the implementation and compliance of the AD requirements for their fleet. We do not consider it appropriate to include AD provisions that apply only to certain operators. It is not necessary to change the final rule to include this provision.

Request To Clarify Relief Provisions

ATA recommended that we simplify and clarify the proposed relief provisions for airplanes having multiple lavatory doors. For those airplanes, ATA recommended that we revise the NPRM (75 FR 61657, October 6, 2010) to provide MMEL (Master Minimum Equipment List) relief for up to–and including–50 percent of the ashtrays for 10 days. (The NPRM specified only ‘‘up to" 50 percent of the ashtrays.) ATA noted that this recommendation would (1) Remove the proposed requirement to replace half of the missing ashtrays within 3 days; (2) provide a level of safety equal to or exceeding the level proposed for airplanes having only one

lavatory door; (3) simplify the management and oversight of MMEL relief by operators and FAA inspectors; and (4) clarify that the phrase ‘‘up to" includes 50 percent, which would eliminate differing interpretations.

We have reviewed the ATA proposal. While we agree that the proposal has merit, we find that it does not account for all possible scenarios. Paragraph (j) of the AD allows 3 days to install any ashtrays if more than 50 percent of the ashtrays are missing. The commenter's proposed change, on the other hand, could ground airplanes: If, for example, 2 of 2 ashtrays are missing, 1 ash tray must be installed before further flight. We have therefore not changed the final rule regarding this issue. But, according to the provisions of paragraph (m) of this AD, we may approve requests to adjust the compliance schedule if the request includes data substantiating that the new schedule would provide an acceptable level of safety.

Request To Revise Compliance Time

Thomas Edward Young requested that we clarify paragraph (j) of the NPRM (75 FR 61657, October 6, 2010) to address the case of a single ashtray missing on an airplane with multiple lavatory door ashtrays. Mr. Young provided alternative text to address this situation.

We disagree with the request. Paragraph (j) of this AD adequately covers the scenario described by the commenter. We have not changed the final rule regarding this issue.

Request To Clarify Proposed Changes

ALPA requested clarification of the relief proposed in the NPRM (75 FR 61657, October 6, 2010) for two possible scenarios.

First, ALPA was concerned about possible confusion of the AD requirements for airplanes with an odd number of multiple lavatory doors with missing or inoperative ashtrays. In this case, the 50 percent criteria specified in the AD would result in a fractional number. ALPA therefore suggested that we revise the NPRM (75 FR 61657, October 6, 2010) to ensure that a fractional number of ashtrays be rounded to the next higher whole number.

Second, ALPA noted that, if there are groups of lavatories in multiple locations throughout an airplane, compliance with the proposed requirements aircraft-wide could result in all of the ashtrays in a group being missing or inoperative. To ensure that the required extinguishing capability is retained, ALPA therefore recommended an additional requirement to ensure that at least one lavatory door in each group of lavatories has a serviceable ashtray.

We disagree with the requests, although we considered both recommendations during the drafting of this revision of the AD. We determined that the commenter's first recommendation (to address airplanes with an odd number of missing ashtrays) would have only added to the complexity of the AD. If the calculation of ashtrays needing to be replaced results in a fractional number, operators will need to round up this figure. The only way to replace 2.5 ashtrays, for example, is to replace 3 ashtrays. We find that additional clarification is not necessary.

We determined that the commenter's second recommendation (to address airplanes with all ashtrays missing in a group of lavatories) would have resulted in confusing and overly complicated requirements. The AD's more simplified approach adequately addresses the unsafe condition.

We have not changed the AD regarding these issues.

Conclusion

We reviewed the relevant data, considered the comments received, and determined that air safety and the public interest require adopting the AD as proposed.

Costs of Compliance

This action merely extends a certain compliance time and does not add any new additional economic burden on affected operators. The relief provided by this AD allows operators to continue to operate airplanes without the required number of ashtrays for a longer period of time than was previously permitted. This results in reduced costs to affected operators since it reduces the potential interruptions in service to reinstall the ashtrays. The current costs associated with this AD are provided below for the convenience of affected operators. The following table provides the estimated costs for U.S. operators to comply with this AD.

Estimated Costs

Action	Work hours	Average labor rate per hour	Parts	Cost per airplane
Placard installations	1	$85	Negligible	$85
Inspections	2	$85	$0	$170 per inspection cycle

Authority for This Rulemaking

Title 49 of the United States Code specifies the FAA's authority to issue rules on aviation safety. Subtitle I, Section 106, describes the authority of the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the Agency's authority.

We are issuing this rulemaking under the authority described in Subtitle VII, Part A, Subpart III, Section 44701, ‘‘General requirements." Under that section, Congress charges the FAA with promoting safe flight of civil aircraft in air commerce by prescribing regulations for practices, methods, and procedures the Administrator finds necessary for safety in air commerce. This regulation is within the scope of that authority because it addresses an unsafe condition that is likely to exist or develop on products identified in this rulemaking action.

Regulatory Findings

We have determined that this AD will not have federalism implications under Executive Order 13132. This AD will not have a substantial direct effect on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government.

For the reasons discussed above, I certify that this AD:

(1) Is not a ‘‘significant regulatory action" under Executive Order 12866,

(2) Is not a ‘‘significant rule" under DOT Regulatory Policies and Procedures (44 FR 11034, February 26, 1979),

(3) Will not affect intrastate aviation in Alaska, and

(4) Will not have a significant economic impact, positive or negative, on a substantial number of small entities under the criteria of the Regulatory Flexibility Act.

List of Subjects in 14 CFR Part 39

Air transportation, Aircraft, Aviation safety, Incorporation by reference, Safety.

Adoption of the Amendment

Accordingly, under the authority delegated to me by the Administrator, the FAA amends 14 CFR part 39 as follows:

PART 39–AIRWORTHINESS DIRECTIVES

1. The authority citation for part 39 continues to read as follows:

Authority: 49 U.S.C. 106(g), 40113, 44701.

§ 39.13 [Amended]

2. The FAA amends § 39.13 by removing airworthiness directive (AD) 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996), and adding the following new AD:

74-08-09 R3 Transport category airplanes: Amendment 39-16951; Docket No. FAA-2010-0956; Directorate Identifier 2010-NM-018-AD.

(a) Effective Date

This airworthiness directive (AD) is effective March 28, 2012.

(b) Affected ADs

This AD revises AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996).

(c) Applicability

This AD applies to transport category airplanes, certificated in any category, that have one or more lavatories equipped with paper or linen waste receptacles. These lavatories may be on various airplanes, identified in but not limited to the airplanes of the manufacturers included in table 1 of this AD.

Table 1–Affected Airplanes

Airplane manufacturer
328 Support Services GmbH (Type Certificate previously held by AvCraft Aerospace GmbH; Fairchild Dornier GmbH; Dornier Luftfahrt GmbH)
AEROSPATIALE (Societe Nationale Industrielle Aerospatiale)
Airbus
ATR – GIE Avions de Transport Régional
BAE Systems (Operations) Limited
The Boeing Company
Bombardier, Inc.
British Aerospace Regional Aircraft
Cessna Aircraft Company
DASSAULT AVIATION
EADS CASA (Type Certificate previously held by Construcciones Aeronauticas, S.A.)
Empresa Brasileira de Aeronautica S.A. (EMBRAER)
Fokker Services B.V.
Gulfstream Aerospace Corporation

Gulfstream Aerospace LP (Type Certificate previously held by Israel Aircraft Industries, Ltd.)
Hamburger Flugzeugbau GmbH
Hawker Beechcraft Corporation (Type Certificate previously held by Raytheon Aircraft Company; Beech Aircraft Corporation)
Israel Aircraft Industries, Ltd.
Learjet Inc.
Lockheed Aircraft Corporation
Lockheed Martin Corporation / Lockheed Martin Aeronautics Company
Maryland Air Industries, Inc.
McDonnell Douglas Corporation
Mitsubishi Heavy Industries, Ltd.
Saab AB, Saab Aerosystems
Sabreliner Corporation
Short Brothers PLC
Vickers-Armstrongs (Aircraft Limited)
Viking Air Limited (Type Certificate previously held by Bombardier, Inc.)

(d) Subject

Air Transport Association (ATA) of America Code 25: Equipment/furnishings.

(e) Unsafe Condition

This revision to the AD (AD 74-08-09 R2 (61 FR 32318, June 24, 1996)) was prompted by the determination that certain compliance times required by the existing AD may be extended and still address fires occurring in lavatories caused by, among other things, the improper disposal of smoking materials in lavatory waste receptacles. This revision to the AD would continue to prevent possible fires that could result from smoking materials being dropped into lavatory paper or linen waste receptacles.

(f) Compliance

You are responsible for having the actions required by this AD performed within the compliance times specified, unless the actions have already been done.

(g) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996): Placard Installation

Within 60 days after August 6, 1974 (the effective date of AD 74-08-09, Amendment 39-1917 (39 FR 28229, August 6, 1974)), or before the accumulation of any time in service on a new production aircraft after delivery, whichever occurs later–except that new production aircraft may be flown in accordance with sections 21.197 and 21.199 of the Federal Aviation Regulations (14 CFR 21.197 and 21.199) to a base where compliance may be accomplished: Accomplish the requirements of paragraphs (g)(1) and (g)(2) of this AD.

(1) Install a placard on each side of each lavatory door over the door knob, or on each side of each lavatory door, or adjacent to each side of each lavatory door. The placards must contain the legible words ‘‘No Smoking in Lavatory" or ‘‘No Smoking," or contain ‘‘No Smoking" symbology in lieu of words, or contain both wording and symbology, to indicate that smoking is prohibited in the lavatory. The placards must be of sufficient size and contrast and be located so as to be conspicuous to lavatory users. And

(2) Install a placard on or near each lavatory paper or linen waste disposal receptacle door, containing the legible words or symbology indicating ‘‘No Cigarette Disposal."

(h) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996): Announcement Procedures

Within 30 days after August 6, 1974 (the effective date of AD 74-08-09, Amendment 39-1917 (39 FR 28229, August 6, 1974)), establish a procedure that requires that, no later than a time immediately after the ‘‘No Smoking" sign is extinguished following takeoff, an announcement be made by a crewmember to inform all aircraft occupants that smoking is prohibited in the aircraft lavatories; except that, if the aircraft is not equipped with a ‘‘No Smoking" sign, the required procedure must provide that the announcement be made prior to each takeoff.

(i) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996): Ashtray Installation

Except as provided by paragraph (j) of this AD: Within 180 days after August 6, 1974 (the effective date of AD 74-08-09, Amendment 39-1917 (39 FR 28229, August 6, 1974)), or before the accumulation of any time in service on a new production aircraft, whichever occurs later–except that new production aircraft may be flown in accordance with sections 21.197 and 21.199 of the Federal Aviation Regulations (14 CFR 21.197 and 21.199) to a base where compliance may be accomplished: Install a self-contained, removable ashtray on or near the entry side of each lavatory door. One ashtray may serve more than one lavatory door if the ashtray can be seen readily from the cabin side of each lavatory door served.

(j) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996), with Revised Compliance Times: Allowances for Partial Replacement

An airplane with multiple lavatory doors may be operated with up to 50 percent of the lavatory door ashtrays missing or inoperative, provided 50 percent of the missing or inoperative ashtrays are replaced within 3 days and all remaining missing or inoperative ashtrays are replaced within 10 days. An airplane with only 1 lavatory door may be operated for a period of 10 days with the lavatory door ashtray missing or inoperative.

Note 1 to paragraph (j) of this AD: This AD permits a lavatory door ashtray to be missing, although the FAA-approved Master Minimum Equipment List (MMEL) may not allow such provision. In any case, the provisions of this AD prevail.

(k) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996): Inspections

Within 30 days after August 6, 1974 (the effective date of AD 74-08-09, Amendment 39-1917 (39 FR 28229, August 6, 1974)), and thereafter at intervals not to exceed 1,000 hours' time-in-service from the last inspections, accomplish the following:

(1) Inspect all lavatory paper and linen waste receptacle enclosure access doors and disposal doors for proper operation, fit, sealing, and latching for the containment of possible trash fires.

(2) Correct all defects found during the inspections required by paragraph (k)(1) of this AD.

(l) Restatement of Requirements of AD 74-08-09 R2, Amendment 39-9680 (61 FR 32318, June 24, 1996): Adjustments to Inspection Intervals

Upon the request of an operator, the FAA Principal Maintenance Inspector (PMI) may adjust the 1,000-hour repetitive inspection interval specified in paragraph (k) of this AD to permit compliance at an established inspection period of the operator if the request contains data to justify the requested change in the inspection interval.

(m) Alternative Methods of Compliance (AMOCs)

(1) The Manager, Airframe/Cabin Safety Branch, Transport Airplane Directorate, FAA, has the authority to approve AMOCs for this AD, if requested using the procedures found in 14 CFR 39.19. In accordance with 14 CFR 39.19, send your request to your principal inspector or local Flight Standards District Office, as appropriate. If sending information directly to the manager of the ACO, send it to the attention of the person identified in the Related Information section of this AD.

(2) Before using any approved AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local flight standards district office/certificate holding district office.

(n) Related Information

For more information about this AD, contact Alan Sinclair, Aerospace Engineer, Airframe/Cabin Safety Branch, ANM-115, Transport Airplane Directorate, FAA, 1601 Lind Avenue SW., Renton, Washington 98057-3356; phone: 425-227-2195; fax: 425-227-1232; email: alan.sinclair@faa.gov.

(o) Material Incorporated by Reference

None.

Issued in Renton, Washington, on January 27, 2012.
Kalene C. Yanamura,
Acting Manager, Transport Airplane Directorate,
Aircraft Certification Service.

U.S. Department
of Transportation
**Federal Aviation
Administration**

**(Regional Name) Directorate
Aircraft Certification Service**

Directorate Address

MAR 27 2012

In Reply
Refer To: ANM-115-12-001

Mr. Mike Bianchi
Director, Technical Operations
Airlines for America
1301 Pennsylvania Ave. NW, Suite 1100
Washington, DC 20004

Dear Mr. Mike Bianchi:

The Federal Aviation Administration (FAA) has received your letter, dated March 8, 2012 requesting an alternative method of compliance (AMOC) to Airworthiness Directive (AD) 74-08-09 R3. AD 74-08-09 R3 requires installation of placards prohibiting smoking in the lavatory and disposal of cigarettes in the lavatory waste receptacles; establishment of a procedure to announce to airplane occupants that smoking is prohibited in the lavatories; installation of ashtrays at certain locations; and repetitive inspections to ensure that lavatory waste receptacle doors operate correctly. This AD extends the time an airplane may be operated with certain missing ashtrays. This AD was prompted by the determination that certain compliance times required by the existing AD could be extended and still address fires occurring in lavatories caused by, among other things, the improper disposal of smoking materials in lavatory waste receptacles. We issued this AD to correct this unsafe condition on these products.

You are requesting approval of revising paragraph (j) to read as follows.

- "An airplane with multiple lavatory doors may be operated for a period of 10 days with up to and including 50 percent of the lavatory door ashtrays missing or inoperative.

- An airplane with multiple lavatory doors may be operated for a period of three days with more than 50 percent of the lavatory door ashtrays missing or inoperative, or.

- An airplane with only 1 lavatory door may be operated for a period of 10 days with the lavatory door ashtray missing or inoperative".

The proposed change is in keeping with the intent of AD 74-08-09 R3 and as Title 14 Code of Federal Regulations (14 CFR) Part 252 bans smoking on all on air carrier and foreign air

carrier flights in scheduled intrastate, interstate and foreign air transportation on all flights with in the United States therefore this proposal provides an acceptable level of safety.

The Transport Standard Staff Office approves your AMOC proposal to revise paragraph (j) of AD 74-08-09 R3 covering the replacement time for ashtrays that have lost or missing.

All provisions of AD 74-08-09 R3 that are not specifically referenced above remain fully applicable and must be complied with accordingly.

In accordance with FAA Order 8110.103A, dated September 28, 2010, the following conditions apply:

1. All provisions of AD 74-08-09 R3 that are not specifically referenced above remain fully applicable and must be complied with accordingly.

2. This approval is applicable to all 14 CFR part 25 certified aircraft.

3. This approval is transferable with airplane(s) to other operators.

4. Before using this AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local flight standards district office/certificate holding district office.

This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as an AMOC to any AD issued by another civil aviation authority (CAA). Approval of an AMOC to another CAA's AD must come from that CAA.

Should you have any questions, please contact this office or Alan Sinclair at telephone number (425) 227-2195, fax (425) 227-1320, or electronic mail at alan.sinclair@faa.gov.

Sincerely,

Franklin Tiangsing
Manager, Airframe & Cabin Safety Branch (ANM-115)
Transport Standards Staff - Transport Airplane Directorate

cc: EASA: ads@easa.europa.eu
Transport Canada: derek.ferguson@tc.gc.ca

FAA Press Release

Tuesday, July 12,2011:

FAA Authorizes Iridium For Oceanic ATC Communications

Tue, 12 Jul '11

Move A Step Toward "Cost-Effective" Oceanic Controller/Pilot Data Link Communications (CPDLC)

The FAA has authorized aircraft operating in oceanic airspace to use Iridium Communications' satellite data services for critical air traffic control communications. The company says this marks completion of the FAA process of evaluating aircraft flying in airspace under its jurisdiction to use Future Air Navigation System (FANS) 1/A over Iridium (FOI) to meet communications requirements for air traffic control. The decision is considered an important milestone in providing corporate and commercial aircraft a cost-effective alternative for implementing FANS 1/A communications. Iridium's fully global coverage provides the aviation industry with an attractive alternative for long-range voice and data communication systems.

"After five years of study, validation and extensive in-flight testing, we are thankful to all stakeholders that participated in this achievement – including the FAA's Performance-based Operations Aviation Rulemaking Committee Communications Working Group (PARC CWG), our extensive ecosystem of aviation partners, participating airlines, the International Civil Aviation Organization (ICAO) and the Radio Technical Commission for Aeronautics (RTCA)," said Iridium CEO Matt Desch. "We believe the FAA's decision validates our position as the optimal satellite service for aircraft operational communications, and opens up significant new opportunities for Iridium in the aviation market. FOI, when implemented, has the potential to enable aircraft operators to reduce their capital investment by half."

In a letter to the FAA, Dave Nakamura, PARC chairman, wrote, "The global air transportation system will benefit from FANS 1/A over Iridium (FOI) as it provides a practical alternative for Air Navigation Service Providers (ANSPs) to expand data link service and for commercial and business aviation markets to equip their fleets more quickly. FOI hardware is a significantly lower cost solution than other Aeronautical Mobile Satellite (Route) Service (AMS(R)S) alternatives. Iridium-based equipment is easier to retrofit, draws less power, is lighter in weight, and provides global coverage, including the Polar Regions."

In a response to Nakamura, Margaret Gilligan, FAA associate administrator for aviation safety, wrote, “The FAA accepts FOI as a viable means for air traffic service communications, particularly in accordance with performance specifications for reduced oceanic separations based on automatic dependent surveillance-contract (ADS-C).” Gilligan added, “The Air Traffic Organization (ATO) will take appropriate action to remove restrictions on FOI operations in its oceanic airspace. The FAA will also advocate removal of any restrictions imposed by other air navigation service providers. FAA aircraft certification and flight standards offices will continue to certify aircraft with FOI installations…” The FAA accepted the recommendations of the PARC following satisfactory completion of a year-long operational evaluation of FOI technology. Other ANSPs are expected to follow the FAA’s lead and accept Iridium as a viable option to meet communication needs in their own airspace in the near future.

FAR 121.351

Sec. 121.351 — Communication and navigation equipment for extended over-water operations and for certain other operations.

(a) Except as provided in paragraph (c) of this section, no person may conduct an extended over-water operation unless the airplane is equipped with at least two independent long-range navigation systems and at least two independent long-range communication systems necessary under normal operating conditions to fulfill the following functions—

(1) Communicate with at least one appropriate station from any point on the route;

(2) Receive meteorological information from any point on the route by either of two independent communication systems. One of the communication systems used to comply with this paragraph may be used to comply with paragraphs (a)(1) and (a)(3) of this section; and

(3) At least one of the communication systems must have two-way voice communication capability.

(b) No certificate holder conducting a flag or supplemental operation or a domestic operation within the State of Alaska may conduct an operation without the equipment specified in paragraph (a) of this section, if the Administrator finds that equipment to be necessary for search and rescue operations because of the nature of the terrain to be flown over.

(c) Notwithstanding the requirements of paragraph (a) of this section, installation and use of a single LRNS and a single LRCS may be authorized by the Administrator and approved in the certificate holder's operations specifications for operations and routes in certain geographic areas. The following are among the operational factors the Administrator may consider in granting an authorization:

(1) The ability of the flightcrew to navigate the airplane along the route within the degree of accuracy required for ATC,

(2) The length of the route being flown, and

(3) The duration of the very high frequency communications gap.

[Doc. No. 6258, 29 FR 19205, Dec. 31, 1964, as amended by Amdt. 121–253, 61 FR 2611, Jan. 26, 1996; Amdt. 121–254, 61 FR 7191, Feb. 26, 1996; Amdt. 121–333, 72 FR 31682, June 7, 2007]

May 15, 2012

To the Commercial Airline Clients of MedLink,

MedAire, an International SOS company, has been providing its MedLink In-flight Medical Advisory services to airlines since 1987. During that time, the MedLink medical team has responded to more than 200,000 in-flight medical events for airlines around the world. Today, MedLink is averaging more than 22,000 cases a year, serving more than 60 airlines.

The MedLink team documents the details of each case in MedAire's proprietary case management system. MedAire routinely mines the case data collected for statistics and trends. Recently, MedAire conducted a study on the incidence of use of the Emergency Medical Kit (EMK) during a medical event and the probability of needing to use the EMK on two consecutive flights. The following is a discussion of the methods and results of the review.

Assumptions:

- The MedLink data are normalized for the rate of medical events per million passengers carried by the seven U.S. carriers studied for the calendar year 2011. This method enables us to reasonably compare carriers with disparate operations since the passenger is the common denominator.
- The definition of a medical event is based on the crew interpretation of the need to contact MedLink. Airline policies vary widely on when to involve MedLink so this certainly influences the number of incidents overall.
- These data cover only events that involved MedLink. Certainly there are other events where the EMK is opened and used by a medical volunteer on board, without consultation with MedLink. To address this problem we can apply the percentage of cases we know there is a doctor on board and apply it to the model.
- Anecdotally, the MedLink team cannot recall a case where a medical event occurred for which there were insufficient quantities of any of the required items in the EMK.

Question:

Based on MedLink In-flight Medical Advisory data, what is the probability of using an Emergency Medical Kit (EMK) on two consecutive commercial flights?

Answer:

The probability of using a kit in two consecutive flights is 1:6 billion passengers carried.

Explanation:

Passenger Traffic		224,634,188
In-flight Medical Events		8,099
Ratio/thousand pax		0.04
Probability event/pax	1:	27,736
Kits opened		2,905
Ratio/ thousand pax		0.01
Probability kit opened/pax	1:	77,327
Probability kit/opened consecutive flights	1:	5,979,425,161

NOTES:

We know there is a doctor on board in 60% of the cases documented. Assuming the possibility that MedLink is only receiving a percentage of the total volume (which should be greater than 60%, since MedLink receives calls when doctors are on board as well), the chances are still extremely low.

Sincerely,

Paulo Alves, MD
Vice President, Aviation Health
MedAire, an International SOS Company
Paulo.alves@medaire.com

Heidi MacFarlane
Vice President, Strategic Development
MedAire, an International SOS Company
Heidi.macfarlane@medaire.com

MMEL Policy Proposal
Display Units

Carlos Carreiro

MMEL IG 87 – Seattle, WA
August 15-16, 2012

Objectives

- Identify existing relief for Display Units found in various aircraft type MMELs
- Present a proposal of standardized relief

Abbreviations

- DU: Display Unit
- PFD: Primary Flight Display
- MFD: Multifunctional Display
- ND: Navigation Display
- SDU: System Display Unit
- EICAS: Engine Indication and Crew Alerting System
- ESIS: Electronic Standby Instrument System
- ISIS: Integrated Standby Instrument System

Display Unit - Definition

- Flat panel display installed on flight deck to provide pilots with information on:
  - Primary Flight Parameters
  - Navigation
  - Engine Parameters
  - System Status (Synoptic Pages)
- May include reversionary functions and/or compressed modes (e.g. PFD and ND data displayed on the same panel)

Requirements

- 14 CFR 91.205
- 14 CFR 121.305
- 14 CFR 121.307

Existing MMEL Relief

Examples ...

B737-600/700/800/900

Original Configuration	– One Inboard DU	– cat A – One Flight Day
	– Lower DU	– cat C
EFI-890	– One Inboard DU	– cat A – Two Flight Days

A318/A319/A320/A321

PFDU 2 / NDU 1 / NDU 2 – cat C
SDU – cat A – Three Flight Days

B777

Lower Center DU – cat C

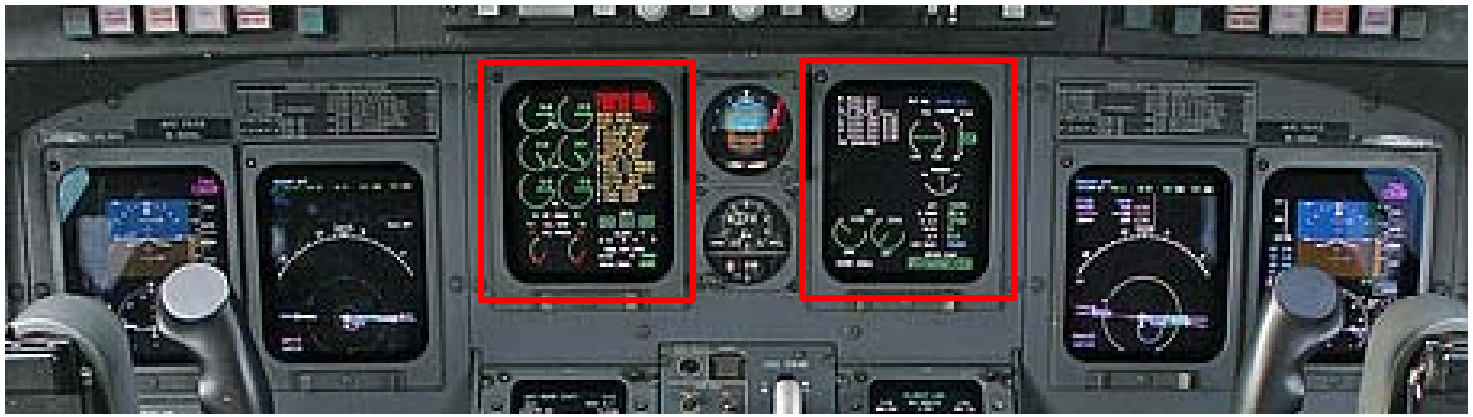
B787

Left Inboard/Outboard DU – cat B
Lower DU – cat C

ERJ-170/175/190/195

RH MFD – cat A – Three Flight Days

CRJ-200/700/900



EICAS Display #1 or #2 – cat B

BD-700
(except Global Vision Flight Deck)

DU #4 – cat B

CE-750

Center DU – cat C

G550

DU #3 – cat C

Issues

- Significant variation of MMEL relief among various aircraft types
- Different reliefs do not appear to be justified based on type design, flight deck configuration or specific component reliability
- Unfair competition among air operators due to different dispatch reliefs
- ATA 31 (Large Airplanes) vs. ATA 34 (Small Airplanes)

MMEL Proposal - Assumptions

- Next worst failure is the remaining DU on same side
- Affected pilot is left with no display of flight/navigation data (he/she becomes a passenger on the flight deck)
- Criticality of such failure is MAJOR
- DU probability of failure in the order of 1×10^{-4}/FH

MMEL Proposal – Criteria (1)

- No relief for displays powered by an emergency bus
- Relief for RH MFD or ND or a secondary EICAS display in a flight deck configuration with at least two DUs capable of displaying flight information on each side
- Relief for RH DU for single pilot operations in a flight deck configuration with two or three DUs across

MMEL Proposal – Criteria (2)

- All remaining display units must be operative
- Reversionary functions must allow flight information to be displayed on the same side operative display unit in a non-compressed mode, unless the compressed mode has been certified as primary means of display
- ESIS/ISIS cannot be used as alleviation for an inoperative MFD/ND

MMEL Relief – Case 1

2 or 3 DUs Across Single Pilot Operations

(e.g. Mustang, Phenom)

Display Units	C	Right DU may be inoperative for single pilot operations provided all remaining DUs are operative.

MMEL Relief – Case 2 (a)

4 DUs Across or

4 DUs Across and Lower DU

(e.g. B787, G550)

RH Inboard DU	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day.

MMEL Relief – Case 2 (b)

4 DUs Across or

4 DUs Across and Lower DU

(e.g. B787)

RH Inboard DU (HUD-equipped airplanes)	A	(O) May be inoperative provided: a) All remaining DUs and HUD are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

MMEL Relief – Case 2 (c)

4 DUs Across or

4 DUs Across and Lower DU

(e.g. B787)

Lower DU	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

MMEL Relief – Case 3 (a)

5 DUs Across or

5 DUs Across and Lower DU

(e.g. B737 NG, A320, B777, ERJ, CE-750)

RH Inboard DU	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day.

MMEL Relief – Case 3 (b)

5 DUs Across or

5 DUs Across and Lower DU

(e.g. B737 NG, A320, B777)

Lower DU	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

MMEL Relief – Case 4 (a)

6 DUs Across

(e.g. CRJ, BD-700)

RH Inboard DU (DU #5)	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day.

MMEL Relief – Case 4 (b)

6 DUs Across

(e.g. CRJ, BD-700)

Center RH DU (DU #4)	A	(O) May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

Thank you

FEDERAL AVIATION ADMINISTRATION

MMEL INDUSTRY GROUP

Master Minimum Equipment List (MMEL)
Agenda Proposal &
Coordination Process

Revision 14: January 2, 2012

Table of Contents

Master Minimum Equipment List (MMEL) Agenda Proposal & Coordination Process

Chapter 1 Introduction

The Air Transport Association of America (ATA) and Federal Aviation Administration (FAA) formed a joint industry Master Minimum Equipment List (MMEL) Subcommittee in January 1991 (NOTE: Subcommittee name changed to MMEL Industry Group in early 2004). The MMEL Industry Group (IG) was formed to develop consensus industry position and make recommendations to the FAA relating to Master Minimum Equipment Lists, FAA Flight Standards letters, FAA Orders, Principal Inspector guidance, related Advisory Circulars (ACs) and other associated documents. As part of their activity, the MMEL IG developed a "lead airline" MMEL revision coordination process to assist the Flight Operations Evaluation Board (FOEB) chairmen develop draft FOEB MMEL agenda items. This document provides guidelines and milestones for developing and submitting proposed MMEL agenda items. However, readers of this document should be aware that MMELs could also be changed by other means such as FAA Global Change Policy Letters and Airworthiness Directives. This document is maintained and revised exclusively by the MMEL IG.

Chapter 2 Background

The objective of this document is to improve the quality of proposed MMEL agenda items and to assist the FAA (FOEB chairmen) develop MMEL revisions on a more timely basis. The document includes assignment of a lead airline to work with the aircraft manufacturers and FOEB chairmen to develop a draft MMEL revision agenda for consideration at an FOEB. The FOEB may be conducted in a formal meeting or "electronically" using the FAA's Flight Standards (AFS-200) web site.

The procedures outlined in this document are intended to reduce the FOEB chairmen's workload, allow early industry involvement with the development of a draft MMEL revision and enable better draft MMEL revisions to be processed sooner. The procedures are intended to enact a proactive and cooperative process that allows the FAA to capitalize on the expertise of both the aircraft manufacturers and operators. Early coordination and interface between the lead airline, the aircraft manufacturer and the FOEB chairman are the cornerstones to make the process successful. Details of the process are described in the following paragraphs.

Chapter 3 MMEL Agenda Item Coordination Process via the Lead Airline

Lead airline assignments for Part 91, 121, 125 and 135 operators will be designated by the MMEL IG in coordination with the ATA and Regional Airline Association (RAA). [Appendix A] provides the lead airline assignments and key personnel for coordinating draft MMEL revisions. The lead airlines will serve as the primary point of contact for the FOEB chairmen, aircraft manufacturers and other operators for a specific airplane MMEL. Since the information in [Appendix A] is dynamic, the MMEL IG will update its contents as required.

3a. The following guidance is provided for determining Lead Airline assignments:

1. Airplane should be operated by the designated Lead Airline.
2. Changing Lead Airline assignments may be made with concurrence of existing Lead Airline. Reason for change may be due to existing Lead Airline workload issues, another airline requesting to assume Lead Airline duties for an airplane type, or the operator retires the airplane type from its fleet, etc.
3. Changes to Lead Airline assignment should be coordinated with the MMEL IG Chairman, the aircraft manufacturer's MMEL representative and the appropriate FOEB Chairman.
4. Disputes over, or petitions for change in lead assignments that cannot be amiably agreed to between the parties will be brought to attention of the MMELIG Chairpersons and will be resolved by membership vote. In response to such petitions, preference should given to the party that has:
    a. The most operational expertise, and/or
    b. The larger percentage of affected equipment in its inventory, and/or
    c. The internal resources and financial ability to support the Lead assignment/ obligation.

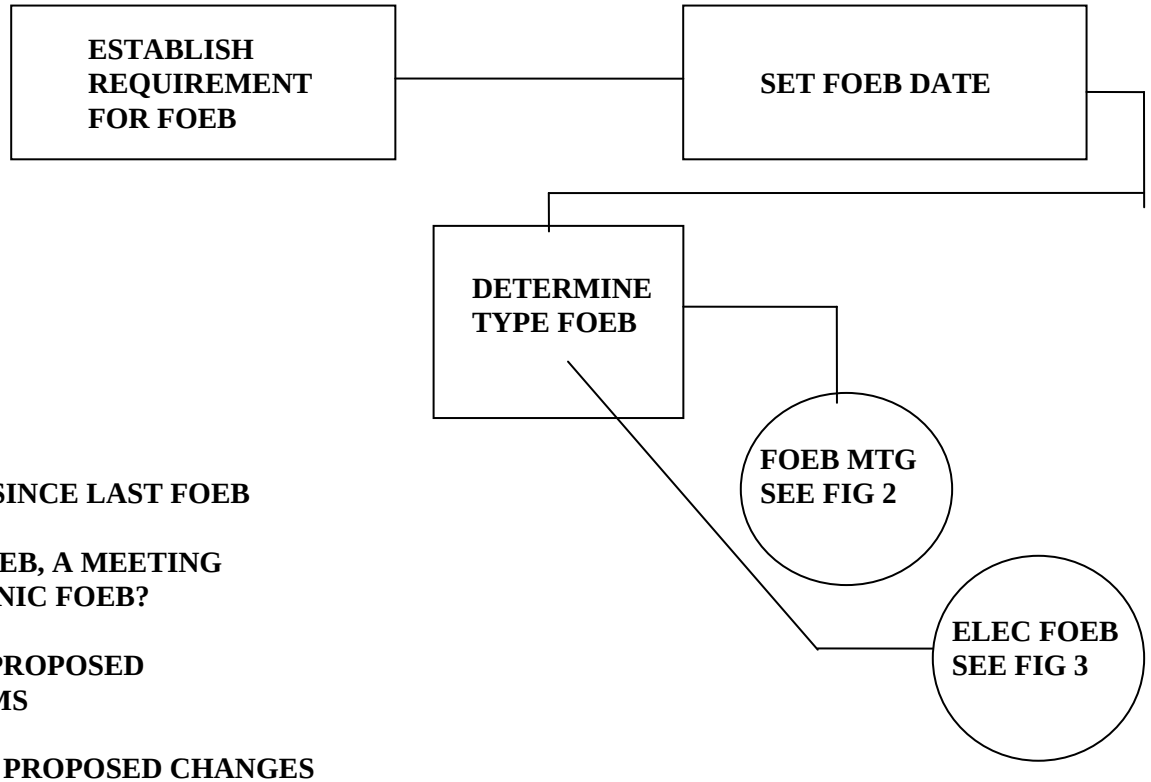
Chapter 4 Formal FOEB Procedure

The following paragraphs provide the procedures and coordination process for submitting draft MMEL agenda items for an FOEB. [Figure 4-1.1] provides the steps and considerations for determining the type of FOEB, meeting or electronic. [Figure 4-1.2] shows the schedule of the lead airline coordination process for developing draft agenda items for an FOEB and for drafting MMEL revisions. [Figure 4-1.3] shows the corresponding, abbreviated process for an electronic FOEB. [Figure 4-1.4] further details the coordination and procedures necessary for FOEBs.

Figures 4-1.1, 4-1.2, 4-1.3 and 4-1.4 on pages 5, 6, 7 & 8.

4-1 Establish proposed FOEB date 210-180 days prior to FOEB

1. The lead airline will coordinate with the aircraft manufacturer and the FOEB chairman to determine a date for the FOEB. In most cases it will take approximately 180-210 days to coordinate the proposals for the FOEB.
2. Once an FOEB date has been coordinated and established between the lead airline, the manufacturer and the FAA FOEB chairman, the lead airline representative or FAA FOEB chairman will notify the FAA AFS-260 in writing as to the date, time and location of the meeting. The FAA AFS-260 will take the necessary action announcing the FOEB meeting. The lead airline will coordinate with the aircraft manufacturer for alerting operators.



CONSIDERATIONS

1. **DATE / TIME SINCE LAST FOEB**

2. **WAS LAST FOEB, A MEETING OR ELECTRONIC FOEB?**

3. **NUMBER OF PROPOSED AGENDA ITEMS**

4. **URGENCY OF PROPOSED CHANGES**

FIGURE 4-1.1 - Determining the Type of FOEB

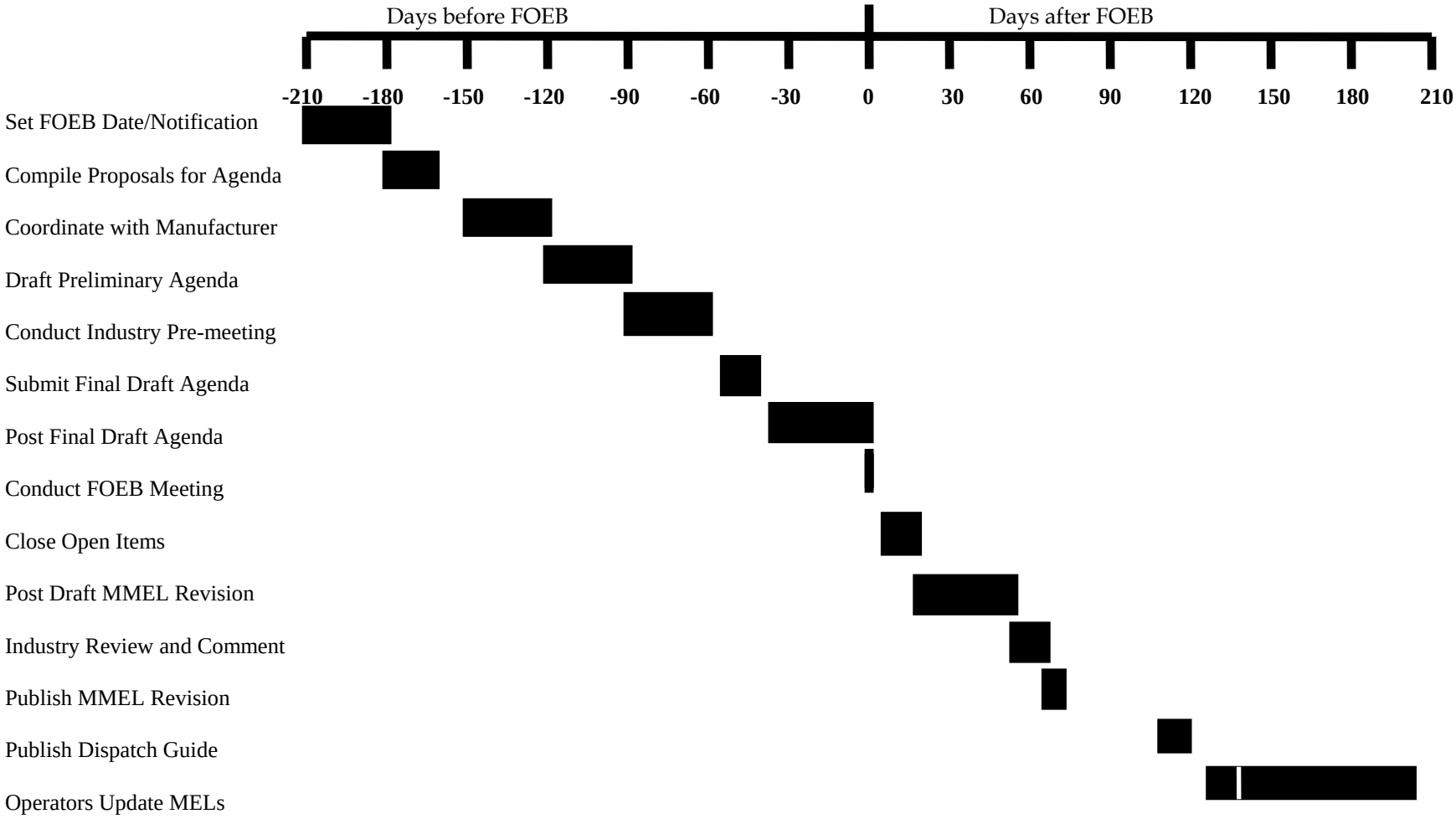


Figure 4-1.2 - FAA FOEB Process

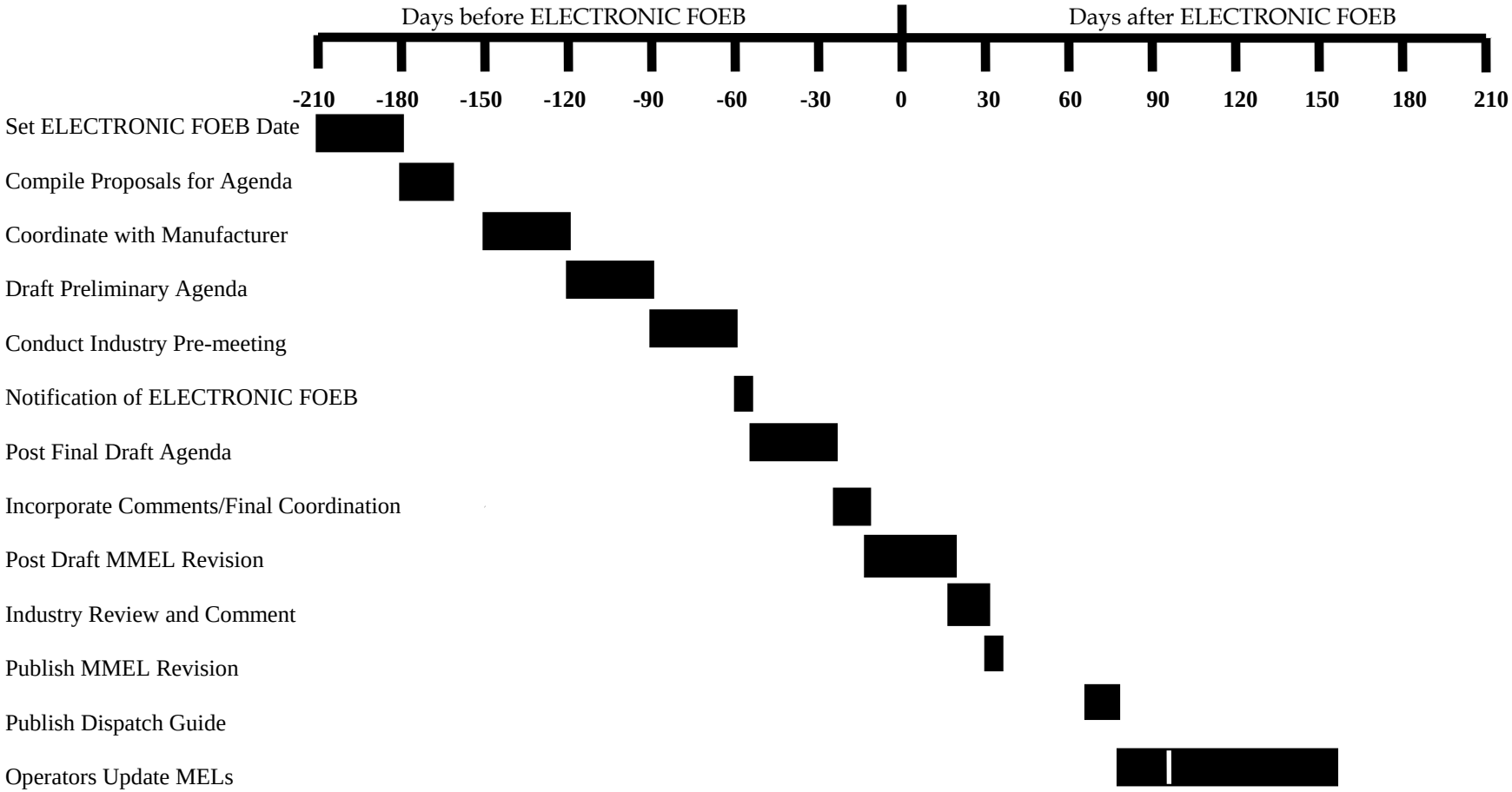
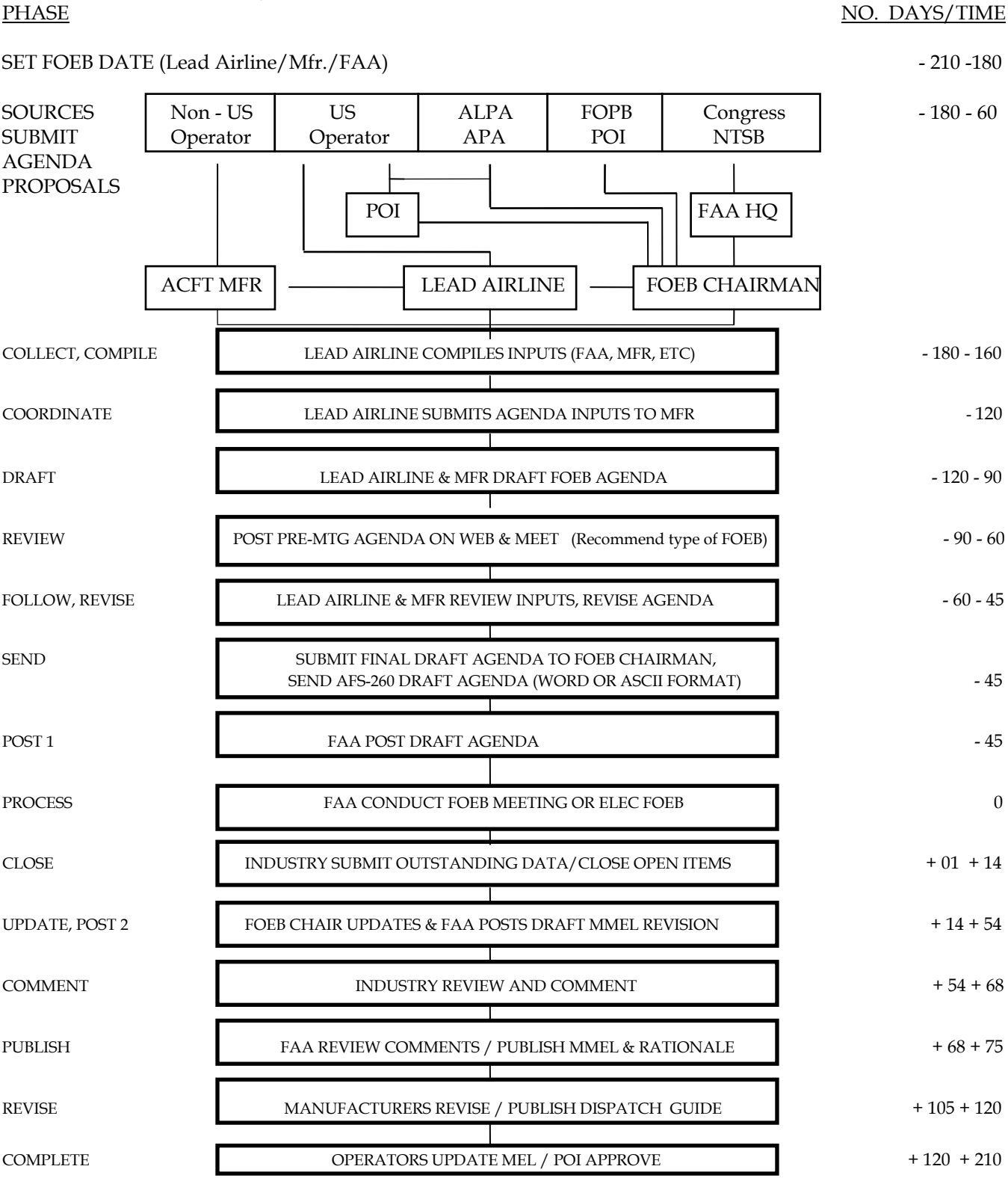


Figure 4-1.3 - FAA ELECTRONIC FOEB Process

Figure 4-1.4 - LEAD AIRLINE MMEL COORDINATION PROCESS



4-2 Collect and compile candidate agenda items 180-160 days prior to FOEB

1. After establishment of the FOEB date, operators should submit proposed agenda items to the lead airline representative at least 160-180 days prior to the FOEB date. Operators should also forward a copy of their agenda items to the FOEB chairman via their Principal Operations Inspector (POI).
2. The aircraft manufacturer will collect and provide other draft MMEL agenda items that have been submitted to the manufacturer to the lead airline at least 160-180 days prior to the FOEB date.
3. Operators are responsible for submitting draft MMEL agenda items to the lead airline and aircraft manufacturer / modifier that pertain to Supplemental Type Certification (STC) systems. Close coordination between the STC holder, operator(s) and the lead airline is critical to ensure that STC MMEL items are properly documented.
4. The lead airline will request a copy from the FOEB chairman of any candidate agenda items that were submitted directly to the FOEB chairman.

4-3 Coordinate draft agenda items with aircraft manufacturer 120 days prior to FOEB

1. The lead airline should submit draft agenda items to the aircraft manufacturer no later than 120 days prior to the FOEB date. To support the draft agenda item(s) operators should include technical data and justification and as appropriate, draft operations (O) and / or maintenance (M) procedures as outlined in [Appendix B]. The lead airline will coordinate with the aircraft manufacturer for a review of technical data, justification and draft procedures.
2. The lead airline should also coordinate with other operators and pilot and labor organizations on proposed agenda items and for additional technical and operator data.
3. The aircraft manufacturer will consolidate technical support recommendations for draft agenda items based on a schedule acceptable to the lead airline and the aircraft manufacturer.
4. Draft MMEL agenda items pertaining to approved STCs / FAA Form 337 should be coordinated between the agenda item originator, the STC / 337 holder and the lead airline. The lead airline should also coordinate with the aircraft manufacturer to ensure continuity for the final draft MMEL agenda package.
5. If it has been determined, in the preparation of the MMEL agenda package, that an O and / or M procedure is required, the lead airline and the aircraft manufacturer will include a draft O and / or M procedure, including provisos, with the draft agenda item. The lead airline and / or manufacturer may also elect to contact the agenda item originator for drafting the O and / or M procedure and provisos. If FAA FOEB input is needed to verify a need for an O and / or M procedure the lead airline and the aircraft manufacturer may provide just the intent / outline of the O and / or M procedure and wait for further guidance at the FOEB.

4-4 Lead airline/manufacturer draft FOEB agenda items 120-90 days prior to FOEB

1. The lead airline and the aircraft manufacturer will develop draft MMEL revision agenda items 90-120 days prior to the FOEB date.
2. Draft MMEL revision agenda items should be developed in the format outlined in [Appendix B]. This format is preferred by the FAA for presentation at the FOEB. Draft agenda items should be completed in Microsoft Word format.
3. Each revision proposal submitted to the FAA may vary in terms of the amount of required data. Simple proposals for typographical errors, minor wording changes, or basic technical changes may be adequately justified by a single sentence or short paragraph. Proposals for which some technical evaluation is necessary may require more substantial written justification as shown in [Appendix B].

4-5 Review draft agenda items at industry pre-meeting 90-60 days prior to FOEB

1. The draft MMEL revision agenda items will be reviewed at an industry pre-meeting 60-90 days prior to the FOEB date. The industry pre-FOEB meeting should be coordinated with the aircraft manufacturer to determine the date and location. ATA or RAA as appropriate may be used to assist in arranging the pre-meeting.
2. The lead airline may also coordinate with FAA AFS-260 and have the draft MMEL revision agenda posted on the FSIMS website for review and access prior to the pre-meeting. The web site address is http://fsims.faa.gov

3. Based on the considerations outlined in [Figure 4-1.1] and related factors discussed at the industry pre-meeting, the lead airline and aircraft manufacturer, in concert with the industry representatives in attendance at the industry pre-meeting, will develop a recommendation as to the type of FOEB (i.e., meeting or electronic). The lead airline may make the recommendation as to the type of FOEB to the FOEB chairman. FOEBs conducted electronically should refer to Chapter 5.
4. Industry representatives unable to participate in the industry pre-meeting may submit comments directly to the lead airline in time for review at the pre-meeting.
5. Contact FOEB Chairman and the Lead Airline to request an FOEB meeting in lieu of an electronic FOEB.

4-6 Follow-up and revise draft agenda 60-45 days prior to FOEB

1. The lead airline and the aircraft manufacturer will compile the agenda items inputs following the industry pre-meeting and develop a final draft MMEL revision agenda.
2. The revision will be accomplished 45-60 days prior to the FOEB date.

4-7 Submit agenda to FOEB chairman and FAA AFS-260 45 days prior to FOEB

1. The lead airline will submit the agenda items to the FOEB chairman NO LATER THAN 45 DAYS PRIOR TO THE FOEB DATE. The FOEB chairman should be provided both a hard copy and electronic media (Word) of the proposed agenda items using the approved FAA format (Ref. [Appendix B]).
2. The lead airline should also forward a hard copy and electronic media of the agenda to:

   Special Programs Branch, AFS-260
   Federal Aviation Administration
   800 Independence Avenue, SW
   Washington, DC 20591
   USA

3. FAA AFS-260 will post the agenda items on the FAA web site upon receipt from the lead airline. FAA AFS-260 will coordinate with the lead airline representative in the event the electronic media is not properly formatted.

4-8 FAA Conducts FOEB - Day 0

1. The lead airline and the aircraft manufacturer may elect to conduct a final industry review prior to the FOEB date and submit additions/revisions to the agenda. The FAA also conducts its own pre-FOEB meeting to review industry agenda items prior to the FOEB.
2. The FAA FOEB chairman will conduct the FOEB meeting and review the agenda items developed under the lead airline process.

4-9 Open agenda items - Submittal of outstanding justification/data 1-14 days

1. The lead airline and aircraft manufacturer will coordinate with the FOEB chairman and conduct a review of FOEB open agenda items and develop an agreement to close out the items within 14 days after the FOEB.
2. Open agenda item justification / data must be submitted to the FOEB chairman within ten working days after the FOEB meeting or the agenda item will be tabled to enable release of the MMEL revision. Incomplete agenda items will be considered for the next MMEL revision.
3. Once tabled open agenda item requirements have been satisfied, the FOEB Chairman may choose to post a draft MMEL revision.

4-10 FOEB updates draft MMEL revision - Post on FAA WEB 14-54 days

1. After receipt of outstanding justification and data from the lead airline and / or manufacturer, the FAA will complete the draft MMEL revision.
2. After updating the draft MMEL revision, the FAA will post the document on the FAA WEB for a period of 14 days for final industry comment.

4-11 Industry review and comment 54-68 days

1. After posting on the FAA WEB, industry will have 14 days to review and submit comments on the draft MMEL revision.
2. Industry comments can be submitted to the FOEB chairman and/or the lead airline. Comments submitted to the FOEB chairman will be reviewed and considered for inclusion in the MMEL revision.
3. To request additional review time notify AFS-260, FOEB Chairman, and the Lead Airline.

4-12. FAA review comments and publish the MMEL revision within 68-75 days after the FOEB

1. After review of industry comments the FAA will post the new MMEL revision on the FAA WEB within 68-75 days after completion of the FOEB.
2. FAA will notify industry of final MMEL revisions.

4-13 Manufacturers revise and publish applicable Dispatch Deviation Guides/ procedures

1. Manufacturers must make every effort to publish a revised Dispatch Deviation Guide (DDG) / procedures in conjunction with the release of a new MMEL.

4-14 Operators revise MEL to reflect changes published in new MMELs

1. In accordance with FAA Policy Letter 86, MMEL changes that are more restrictive than the operator's MEL, are to be submitted to the Principal Operations Inspector (POI) within 90 days of the MMEL revision date, unless the operator and the POI agree that extenuating circumstances preclude adoption of a specific MMEL item. The POI may authorize an additional 90days if deemed necessary.

Chapter 5 Electronic FOEB Procedure

5-1 Coordinate with FOEB Chairman

1. At the industry pre-meeting, held 60-90 days prior to an FOEB, a recommendation will be developed as to the type of FOEB (i.e., meeting or electronic).
2. The lead airline and aircraft manufacturer will coordinate with the FOEB chairman to obtain concurrence and establish a target date for the ELECTRONIC FOEB.

5-2 Coordinate with FAA AFS-260

1. Once a date has been established, the lead airline will notify FAA AFS-260 stipulating that industry and the FAA FOEB chairman have agreed to conduct an electronic FOEB (for type airplane) and to expect a draft MMEL agenda to be forwarded to FAA AFS-260 by a specific date.
2. FAA AFS-260 will take the necessary action to publish the appropriate notification announcing the electronic FOEB, the date the draft MMEL revision will be posted and when comments will be due.

5-3 Post draft MMEL agenda package/Conduct FOEB electronically

1. The FAA will post the draft MMEL agenda items on the FAA AFS-200 web site for 30 days to allow for comment.
2. Industry should access the FAA web site and provide comments on the FAA web. Comments should also be forwarded to the lead airline, FOEB chairman and aircraft manufacturer.

5-4 Lead airline, aircraft manufacturer and FAA (FOEB chairman and AFS-260) coordinate industry comments

1. The lead airline, aircraft manufacturer and the FAA (FOEB Chairman and AFS-260) should review industry comments and agree on follow-on action for draft MMEL agenda items. Options include: revise and report on web site for follow-on review or, promulgates MMEL revision with change recommendations considered and incorporated.
2. Coordination of comments and follow-on action should be completed within 14 days after the comment period is closed.

5-5 FAA AFS-260 post MMEL revision on Web Site

1. The FAA AFS-260 will post the revised MMEL on the FAA AFS-200 web site within seven days after final coordination is completed.
2. A revised draft MMEL that requires additional comment / review will be posted for ten additional working days. Final coordination and dissemination of a revised MMEL will be completed within seven days after the second comment period is completed.

5-6 Other Considerations

1. Requirements pertaining to technical justification and data, O and / or M procedures, agenda format and Microsoft Word are applicable for the electronic FOEB.
2. In cases where an electronic FOEB is to be originated by the FOEB chairman, it is incumbent that the FOEB chairman coordinate with the lead airline and aircraft manufacturer to enable the opportunity to include additional agenda items with the FOEB chairman's electronic FOEB package. The FOEB chairman, lead airline and manufacturer should agree on a timetable and follow the above electronic FOEB procedures as appropriate.

Chapter 6. MMEL Coordination Process Improvement

In order to provide feedback on the effectiveness of the MMEL coordination process and to enable improvements to the MMEL coordination process, lead airlines and aircraft manufacturers are requested to track the MMEL development and publication time using the format outlined in [Appendix D].

Reports by lead airlines will be included in quarterly industry and government MMEL IG meetings with the intent of high-lighting the coordination process steps that worked particularly well or became backlogged or delayed.

Master Minimum Equipment List (MMEL) Agenda Proposal & Coordination Process

Appendix A, as of September, 2010

MMEL LEAD AIRLINES

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
DC-8	ASTAR Air Cargo	Mr. Eric Bergesen Flight Standards ASTAR Air Cargo, Inc. 859-980-1084 / 859-980-1749 (office) Fax: 859-980-3216 Email: MngrFltTrng&Stndrds@astaraircargo.us
DC-9/MD-80	American Airlines	Mr. Donn Reece Flight Operations Technical American Airlines MD 843 PO Box 619617 DFW Airport, TX 75261-9617 817-967-5115 Fax: 817-967-5443 Email: donn.reece@aa.com
DC-10	OPEN	Contact Manufacturer or FOEB Chairman
MD-90	Delta Air Lines	Mr. George M. Roberts Manager – MEL Programs Delta Air Lines, Inc. Department 088 P.O. Box 20706 Atlanta, GA 30320-6001 404-714-6763 Fax: 404-715-7202 Email: george.m.roberts@delta.com
B717	AirTran Airways	Mr. Thomas Young Director of Maintenance Southern Region AirTran Airways 9955 AirTran Blvd. Orlando, FL 32827 407-318-5536 Fax: 407-318-5952 Email: thomas.young@airtran.com

MMEL LEAD AIRLINES (cont.)

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
MD-10 MD-11	Federal Express	Mr. Michael W. Krueger Standards & Tech. Support 901-224-5335 Fax: 901-224-5337 Email: mwkrueger@fedex.com Mr. Carl Krueger Standards & Tech. Support 901-224-5528 Fax: 901-224-5337 Email: carl.krueger@fedex.com Federal Express Delivery Code 0135 3131 Democrat Road Memphis, TN 38133
B727	Federal Express	Mr. Frank Rogers Flight Standards & Tech. Support Federal Express Delivery Code 0135 3131 Democrat Road Memphis, TN 38118 901-224-4979 Fax: 901-224-5537 Email: frank.rogers@fedex.com
B737	Southwest Airlines	Mr. Jim Stieve Sr. Manager Certification and Compliance Southwest Airlines P.O. Box 36611, HDQ 1DP 2702 Love Field Drive Dallas, TX 75235-1611 214-792-3517 Fax: 214-792-3120 Email: jim.stieve@wnco.com
B747 (100-300/SP)	OPEN	Contact Manufacturer or FOEB Chairman
B747-400	Delta Air Lines	Mr. George M. Roberts Manager – MEL Programs Delta Air Lines, Inc. Department 088 P.O. Box 20706 Atlanta, GA 30320-6001 404-714-6763 Fax: 404-715-7202 Email: george.m.roberts@delta.com

MMEL LEAD AIRLINES (cont.)

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
B757	Delta Air Lines	Mr. George M. Roberts Manager – MEL Programs Delta Air Lines, Inc. Department 088 P.O. Box 20706 Atlanta, GA 30320-6001 404-714-6763 Fax: 404-715-7202 Email: george.m.roberts@delta.com
B767	Delta Air Lines	Mr. George M. Roberts Manager – MEL Programs Delta Air Lines, Inc. Department 088 P.O. Box 20706 Atlanta, GA 30320-6001 404-714-6763 Fax: 404-715-7202 Email: george.m.roberts@delta.com
B777	United Airlines	Mr. Tom Atzert Manager, MEL Engineering United Air Lines Network Operations Center 233 S. Wacker Drive, 28th Floor OPBEG Chicago, IL 60606 872-825-1031 Fax: 872-825-0470 thomas.atzert@united.com
B787	United Airlines	Mr. Tom Atzert Manager, MEL Engineering United Air Lines Network Operations Center 233 S. Wacker Drive, 28th Floor OPBEG Chicago, IL 60606 872-825-1031 Fax: 872-825-0470 thomas.atzert@united.com
L1011	OPEN	Contact Manufacturer or FOEB Chairman

MMEL LEAD AIRLINES (cont.)

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
A300 B4	ASTAR Air Cargo	Mr. Steve Capps Flight Standards ASTAR Air Cargo, Inc. 937-302-5864 (office) Fax: 937-655-5111 Email: Steve.Capps@astaraircargo.us
A300-600/310	Federal Express	Mr. Jason Bohannan Flight Standards and Tech Support Federal Express Delivery Code 0135 3131 Democrat Road Memphis, TN 38133 901-224-5338 Fax: 901-224-5359 Email: jason.bohannan@fedex.com
A318/319/320/321	Delta Air Lines	Mr. George M. Roberts Manager – MEL Programs Delta Air Lines, Inc. Department 088 P.O. Box 20706 Atlanta, GA 30320-6001 404-714-6763 Fax: 404-715-7202 Email: george.m.roberts@delta.com
A330	US Airways	Mr. Bob Taylor Manager - MEL Administration US Airways Operations Control Center – PIT OPS MCL 150 Hookstown Grade Road Moon Township, PA 15108 412 474-4355 Fax: 412-474-4396 E-mail: rtaylor@usairways.com
A350 XWB	United Airlines	Mr. Tom Atzert Manager, MEL Engineering United Air Lines Network Operations Center 233 S. Wacker Drive, 28th Floor OPBEG Chicago, IL 60606 872-825-1031 Fax: 872-825-0470 thomas.atzert@united.com
F-28 Mk 1000 F-28 Mk 2000 F-28 Mk 4000	OPEN	Contact Manufacturer or FOEB Chairman
F100/F70	OPEN	Contact Manufacturer or FOEB Chairman

RAA OPERATOR LEAD AIRLINES

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
ATR 42/72	Mountain Air Cargo	Captain Matthew Riley Assistant Director of Operations Mountain Air Cargo 3524 Airport Rd. Maiden, NC 28650 Phone: 828-464-8741, ext. 214 Email: mriley@mtaircargo.com
Bae 146/RJ	OPEN	Contact Manufacturer or FOEB Chairman
Beechcraft 1900D	OPEN	Contact Manufacturer or FOEB Chairman
CRJ 100/200/700/900	Mesaba/Piedmont	Mr. Roger Lien CRJ Fleet Manager 1000 Blue Gentian Road, Suite 200 Eagan, MN 55121 Phone: 612-794-9417 Fax: 612-794-9495 Email: roger.lien@mesaba.com
DHC-6	Scenic Airlines	Mr. Glenn R. Nicoll Scenic Airlines 2705 Airport Drive North Las Vegas, NV 89032 Phone: 520-638-2463 Email: Gnicoll@scenic.com
DHC-8-100/200/300	Piedmont Airlines	Mr. Andrew Wills Dash 8 Program Manager Piedmont Airlines 4800 Hangar Road Charlotte, NC 28208 Phone: 704-359-1432 FAX: 704-359-2748 Email: Andy.Wills@usairways.com
DHC-8-400	Horizon Air	Mr. Jeff Sparks Project Pilot Horizon Air Email: jeff.sparks@horizonair.com
DOR 328	OPEN	Contact Manufacturer or FOEB Chairman

RAA OPERATOR LEAD AIRLINES (cont.)

AIRPLANE	AIRLINE	AIRLINE POINT OF CONTACT
DO-328JET	Skyway	Mr. Doug Myers Phone: 414-570-2380 Email: dmyers@midwest-express.com
EMB 120	SkyWest	Mr. Bill Boice SkyWest Airlines 444 South River Road St. George, Utah 84790 Phone: 435-634-3730 Email: bboice@skywest.com
EMB 135/140/145	American Eagle Airlines	Capt. Chip Bearden - EMB Fleet Manager 972-425-1450 / Email: curtis.bearden@aa.com OR Capt. Ed Korzun - CRJ Fleet Manager 972-425-1776 / Email: ed.korzun@aa.com American Eagle Airlines 1700 West 20th Street DFW Airport, TX 75261-2527 Fax: 972-425-1938
EMB 170/190	OPEN	Contact Manufacturer or FOEB Chairman
Jetstream 31/32	Corporate Airlines	Mr. Kevin J. Cline Phone: 615-223-5644 ext. 114 Email: kcline@corporateairlines.com
Jetstream 41	Trans States Airlines	Mr. Matt Conrad Phone: 314-222-4357 Email: conradm@transstates.net
Metro II	Big Sky	Mr. Craig Denney Big Sky Airlines 1601 Aviation Place Billings, MT 59105 Phone: 406-247-3912 Email: craig.denney@bigskyair.com
Saab 340	Mesaba Airlines, Inc.	Mr. Dan Sauter Saab 340 Fleet Manager Mesaba Airlines, Inc. Phone: 651-367-5106 FAX: 651-367-5125 Email: Daniel.sauter@mesaba.com

ASSOCIATION CONTACTS

Air Transport Association

Mr. Joe White
Managing Director, Maintenance & Engineering
Air Transport Association
1301 Pennsylvania Avenue, NW - Suite 1100
Washington, DC 20004-1701
202-626-4036
Fax: 202-626-4159
Email: jwhite@airlines.org

Regional Airline Association

Mr. Dave Lotterer
Vice President, Technical Services
Regional Airline Association
2025 M Street, NW
Washington, DC 20036
202-367-1252
Fax: 202-367-2252
Email: dlotterer@smithbucklin.com

Air Line Pilots Association

Captain Dennis Landry
Chairman ALPA MMEL Committee
Air Line Pilots Association
563 Cotton Lane
Ramer, TN 38367
662-415-1863
Email: Dennis.landry@alpa.org

Allied Pilots Association

Captain Dave Stewart
Union Representative
APA
14600 Trinity Blvd, Suite 500
Fort Worth, TX 76155-2512
800-323-1470 ext. 2150
Fax: 817-302-2152
Email: sandy2772dvs@sbcglobal.net

Independent Pilots Association

Mr. Bob Esham
IPA
2000 High Rise Drive - Suite 199
Louisville, KY 40213
502-968-0341 ext. 858
Fax: 502-968-0470
Email: 73101.204@compuserve.com

Association of Flight Attendants

Mr. Chris Witkowski
Ms. Candace Kolander
Association of Flight Attendants
501 Third Street NW
Washington, DC 20001
Phone: 202-434-0595
Fax: 202-434-1105
Email: cwitkowski@afanet.org
Email: ckolander@afanet.org

National Business Aviation Association (NBAA)

Mr. Eli Cotti
Director, Technical Operations
National Business Aviation Association (NBAA)
1200 18th St., NW, STE. 400
Washington, DC 20036
Off : 202-737-4479
Fax : 202-331-8364
Email: ecotti@nbaa.org

AIRCRAFT MANUFACTURER CONTACTS

Airbus A300B4, A300-600/310	Mr. Lionel LESTRUHAUT Head of Flight Operations Support for A300/A310 Family Flight Operations Support and Services Airbus S.A.S. 1 rond-point Maurice Bellonte 31707 Blagnac Cedex France Tel: +33-5-6211-0912 Fax: +33-5-6193-2968 Email: lionel.lestruhaut@airbus.com
Airbus A318/319/320/321, a330, A350XWB	Mr. Andre SOL Head of Dispatch Standards MMEL and MMOSEL Flight Operations Support and Services Airbus S.A.S. 1 roun-point Maurice Bellonte 31707 Blagnac Cedex France Tel: +33-5-6193-4968 Fax: +33-5-6193-2968 Email: andre.sol@airbus.com
Airbus Americas	Mr. Rudy Canto Director, Flight Operations Technical Airbus Americas 1909 K Street, NW, Suite 720 Washington, DC 20006 Office: 202-331-2237 Fax: 202-467-5492 Email: Rudy.Canto@airbus.com
Boeing-Seattle/Long Beach	Mr. Robert Borst Manager, Dispatch Requirements Flight Operations Engineering Boeing Commercial Airplane Group PO Box 3707 MS 20-88 Seattle, WA 98124-2207 206-662-4295 (office) 253-653-6831 (mobile) Email: robert.g.borst@boeing.com
Bombardier	Mr. Jean-Pierre Dargis Core Engineering/Aircraft Program Development Center P.O. Box 6087, Station Centre-ville Montreal, Quebec, Canada H3C 3G9 514-855-8516 FAX: 514-855-7970 Email: jean-pierre.dargis@aero.bombardier.com

AIRCRAFT MANUFACTURER CONTACTS (Cont.)

British Aerospace	Mr. Brian G. Statham Principal Reliability Engineer British Aerospace Regional Aircraft Woodford, Stockport Cheshire SK7 1QR England 161-439-5050 ext. 3724 Fax: 161-955-3028
Cessna Aircraft Company	Mr. Mike Veley Supervisor MMEL Group 316-517-8131 (office) mveley@cessna.textron.com MMEL@cessna.textron.com Mr. Todd Schooler MMEL Specialist 316-517-2658 (office) tmschooler@cessna.textron.com MMEL@cessna.textron.com
Dassault Aviation	C.GIRAUDEAU MMEL Expert 54 Avenue Marcel Dassault 33 701 Merignac Cedex, France Tel: 33 556 139 289 Email: christophe.giraudeau@dassault.com
Embraer (EMB 135/140/145/Legacy)	Mr. Marcelo Chan 55 12 3927 5526 Email: marcelo.chan@embraer.com.br
(EMB 170)	Mr. Kleber Salomao 55 12 3927 5524 Email: ksalomao@embraer.com.br Mr. Luciano Saraiva Resende 55 12 3927 5524 Email: luciano.saraiva@embraer.com.br Mr. Thiago Luis Viana de Santana Flight Operations Engineering 55-12-3927-2476 Thiago.viana@embraer.com.br
Fokker	Mr. Hans Wareman Fokker Services B.V. PO Box 75047 NL 1117 2N Schipol-Oost The Netherlands 31-20-605-2167 Fax: 31-20-605-2000

AIRCRAFT MANUFACTURER CONTACTS (Cont.)

Gulfstream	Bruce L. Barefoot Sr. Production Test Pilot 912-965-2802 Email: bruce.barefoot@gulfstream.com
Hawker Beechcraft Corporation	Mr. Dean Hartschen Principal Product Technical Expert Hawker 4000 10511 E. Central Wichita, KS 67206 Office: 316.676.2645 Email: dean_hartschen@hawkerbeechcraft.com
Lockheed	TBD Commercial Flight Ops Lockheed-Martin Aeronautical 120 Orion Street Greenville, SC 29605 864-236-3647 Fax: 864-236-3622 Email: TBD
Saab	Mr. Bob Roth Chief Pilot / Flight Operations Advisor SAAB Aircraft of America LLC 21300 Ridgetop Circle Sterling, VA 20166 Office: 703-406-7232 Cell: 817-368-6288 Email: Bob.Roth@saaius.com

FEDERAL AVIATION ADMINISTRATION, WASHINGTON HEADQUARTERS CONTACTS

AFS-1

Mr. John Allen, Director
Flight Standards Service, AFS-1
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591
Office: 202-267-8237

AFS-200

Mr. John Duncan, Manager
Air Transportation Division, AFS-200
Federal Aviation Administration
800 Independence Avenue, SW (Room 831)
Washington, DC 20591
Office: 202-267-3833
Fax: 202-267-5299

AFS-220

Mr. Richard Clark, Manager
Air Carrier Operations Branch, AFS-220
Federal Aviation Administration
800 Independence Avenue, SW (Room 831)
Washington, DC 20591
Office: 202-493-5581
Fax: 202-267-5229

AFS-260

Mr. Bob Davis, Manager
Technical Programs Branch, AFS-260
Federal Aviation Administration
800 Independence Avenue, SW (Room 831)
Washington, DC 20591
Office: 202-267-3567
Fax: 202-267-5229
Email: robert.davis@faa.gov

FEDERAL AVIATION ADMINISTRATION, AEG CONTACTS

Seattle AEG
Northwest Mountain Region
(Transport Airplane Cert. Directorate)

Mr. Keeton Zachary, Manager
Seattle Aircraft Evaluation Group
1601 Lind Avenue, SW
Renton, WA 98055-4056
425-917-6600
Fax: 425-917-6638
Email: keeton.zachary@faa.gov

Boston AEG
New England Region
(Engine and Propeller Cert. Directorate)

Mr. Gilbert J. DaCosta, Manager
Boston Aircraft Evaluation Group
12 New England Executive Park
Room 212, FSDO-07
Burlington, MA 01803
617-238-7201
Fax: 617-238-7898
Email: gilbert.j.dacosta@faa.gov

Long Beach AEG
Northwest Mountain Region
(Transport Airplane Cert. Directorate)

Mr. Eugene F. Huettner, Manager
Long Beach Aircraft Evaluation Group
3690 Paramount Boulevard
Lakewood, CA 90712-4137
562-627-5270
Fax: 562-627-5281
Email: gene.huettner@faa.gov

Kansas City AEG
Central Region
(Small Airplane Directorate)

Mr. Walt Hutchings, Manager
Kansas City Aircraft Evaluation Group
901 Locust, Room 332
Kansas City, MO 64106
816-329-3234
Fax: 816-329-3241
Email: walt.hutchings@faa.gov

Fort Worth AEG
Southwest Region
(Rotorcraft Directorate)

Mr. Mark C. Fletcher, Manager
Fort Worth Aircraft Evaluation Group
DOT / FAA / SW Region / FTW
Ft. Worth, TX 76193-02709
Phone: (817) 222-5269
FAX: (817) 222-5295
Email: mark.c.fletcher@faa.gov

FORMAT FOR PROPOSED FOEB AGENDA ITEMS

Appendix B

I. **Summary Page**. Document and justify proposed MMEL agenda items in a summary page formatted as follows below. The magnitude and complexity of the proposed revision will determine the scope of the justification data:

1. Subject – Title and number of proposed MMEL item.
2. Proposal – Summary of proposed MMEL relief.
3. Justification – Provide data substantiating proposal.
4. System(s) Description - should include a description of the system or equipment under consideration, its function and other details that will aid in evaluating the proposal. If possible, any variations within the fleet should also be defined, such as different numbers installed on aircraft, etc. If possible, a schematic diagram or other system drawing should be included for clarification.
5. Certification Basis (optional) - This may be included to explain any certification requirements, or lack thereof associated with the agenda item.
6. Effect of Failure - the effect of the failure on the aircraft/system should be clearly explained. Consideration must be given to the possible interaction of the inoperative system or equipment with other systems. A clear description of the effects will avoid any misconceptions and improper conclusions by the evaluator.
7. Effects of Additional Enroute Failures - in addition to including an evaluation of the potential outcome of operating with items that are inoperative, documentation should consider the subsequent failure of the next critical component, the interrelationships between items that are inoperative, the impact on aircraft flight manual procedures (AFM) and the increase in flight crew workloads.
8. Procedures - any operations (O) and/or maintenance (M) procedures required for the proposed dispatch condition should be defined. It is preferred that the detailed O and/or M procedure be identified. However, in some cases a general outline and description of the functions to be accomplished by the procedure should be adequate for presentation at the FOEB. The intent of providing this information is to help support the agenda item and in no way means that the FAA is approving the procedure(s).

II. **Submit existing and proposed MMELs using MMEL Proposal - Record Summary Template Appendix D**. Examples of Summary Page and associated submittals follow:

Appendix C

FAA Websites - Draft and Final MMELs

FAA Aviation Safety Draft Documents Open for Comment Website

Draft MMELs will be posted on the FAA “Aviation Safety Draft Documents Open for Comment” Website (http://www.faa.gov/aircraft/draft_docs/).

Once on the Website, under the heading of Flight Standards Service (AFS) Draft Documents, select “Master Minimum Equipment List (MMEL)”, and then locate the desired document.

Draft MMELs may be downloaded for viewing or printing; comments may be submitted to the FOEB Chairman via e-mail; comments, when posted, may be viewed via the Draft Document Comment Grid.

FAA FSIMS Website

Final MMELs will be posted on the FAA's Flight Standards Information System (FSIMS) Website (http://fsims.faa.gov/).

Once on the Website, select “Publications”, then “Master Minimum Equipment List (MMEL)”, and then navigate to the desired document.

Posted MMELs may be downloaded for viewing or printing.

MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

Record Summary

Subject:

21-33-03 Cabin Rate-of-Climb Indicator

Proposal:

Delete "M" from first set of provisos.

Justification:

Relief may be given provided all other components of the cabin pressurization control system are operative, or if flight is conducted in an unpressurized configuration and the Cabin Air Outflow Valve remains OPEN.

For this proposal, which concerns dispatch option 01, there is no additional maintenance procedure required for this item.

System Description:

Provides Cabin Rate-of-Climb Indication.

Effect of Failure:

Cabin Rate-of-Climb Indication not available.

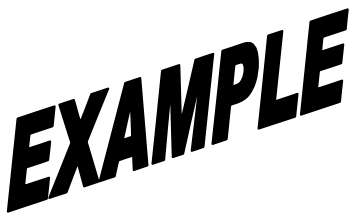
Effect of Additional Enroute Failures:

Redundant features of cabin pressurization control system will be available.

Procedures:

For dispatch option 01, none required.

For dispatch option 02, (M) procedures required to position Cabin Air Outflow Valve OPEN; (O) procedures required to configure and operate the airplane unpressurized.



MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

U.S. Department Of Transportation Federal Aviation Administration — Master Minimum Equipment List

Aircraft MD-90 — Revision Number: — Page: 21-X

Proposed By: ABC Air Lines — Date: 3/20/00

Present

21 Air Conditioning

Sequence Number 21 33 01	Name / Description	Repair category	Number Installed	Number Required for Dispatch	Maintenance Procedure Required	Operations Procedure Required	Remarks or Exceptions
01	Cabin Rate-of- Climb Indicator	D	1	0	M		May be inoperative provided all other components of the cabin pressurization control system are operative.
02	Cabin Rate-of- Climb Indicator	C	1	0	M	O	May be inoperative provided: a) Flight is conducted in an unpressurized configuration, and b) The Cabin Air Outflow Valve remains OPEN.

EXAMPLE

MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

U.S. Department Of Transportation Federal Aviation Administration — Master Minimum Equipment List

Aircraft MD-90 — Revision Number: — Page: 21-X

Proposed By: ABC Air Lines — Date: 3/20/00

Proposed

21 Air Conditioning

Sequence Number 21 33 01	Name / Description	Repair category	Number Installed	Number Required for Dispatch	Maintenance Procedure Required	Operations Procedure Required	Remarks or Exceptions
01	Cabin Rate-of- Climb Indicator	D	1	0			May be inoperative provided all other components of the cabin pressurization control system are operative
02	Cabin Rate-of- Climb Indicator	C	1	0	M	O	May be inoperative provided: a) Flight is conducted in an unpressurized configuration, and b) The Cabin Air Outflow Valve remains OPEN.

EXAMPLE

MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

Record Summary

Subject:

Proposal:

Justification:

System Description:

Effect of Failure:

Effect of Additional Enroute Failures:

Procedures:

MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

U.S. Department Of Transportation Federal Aviation Administration — Master Minimum Equipment List

Aircraft XXXXX — Revision Number: — Page: XX-X

Proposed By: XXXXXX — Date: XX/XX/XXXX

ATA Number / Chapter Name Item	Present Repair category	Number Installed	Number Required for Dispatch	(M) Procedure	(O) Procedure	Remarks or Exceptions

TEMPLATE

MMEL PROPOSAL – RECORD SUMMARY TEMPLATE (Appendix D)

U.S. Department Of Transportation Federal Aviation Administration — Master Minimum Equipment List

Aircraft XXXXX — Revision Number: — Page: XX-X

Proposed By: XXXXXXX — Date: XX/XX/XXXX

ATA Number / Chapter Name Item	Proposed Repair category	Number Installed	Number Required for Dispatch	(M) Procedure	(O) Procedure	Remarks or Exceptions

TEMPLATE

Intentionally Blank

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 87

July 26, 2012

2012

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
Jan 4 - 5				**MMEL IG 85**	**Jet Blue**			**Orlando**
Apr 11 - 12				**MMEL IG 86**	**FAA/A4A**			**Washington DC**
TBD				MD 10/11 FOEB	Fed-X			Electronic
Aug 15 - 16				**MMEL IG 87**	**Boeing**			**Seattle**
Sept 19				DC3 FOEB				LGB AEG
Oct 10 - 11				CL-300				Electronic G. Hartmann - Chrmn.
Oct 23 - 25				CL-600				LGB AEG S. Ford – Chrmn.
Oct 24 - 25				DHC-400				Electronic G. Hartmann - Chrmn.
Nov 7 - 8				**MMEL IG 88**	**UPS**			**Louisville**

Provide changes to MMEL IG Industry Chairman - Robert.Taylor2@usairways.com

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 87

July 26, 2012

2013

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
Jan 9-10				MMEL IG 89	US Airways			PHX
April 17-18				MMEL IG 90	Cessna			Wichita
TBD				MMEL IG 91	OPEN			TBD
Oct 23-24				MMEL IG 92	FAA			Washington DC

Provide changes to MMEL IG Industry Chairman - Robert.Taylor2@usairways.com

AIRLINE INDUSTRY MMEL INDUSTRY GROUP

MMEL IG/FOEB Calendar Rev. 87

July 26, 2012

2014

Currently Scheduled Date	Originally Planned Date(s)	Cause of Delay	Pre-Meeting	Type Meeting	Host / Lead Airline	MMEL Rev Date	DDG Pub Date	Remarks
TBD				MMEL IG 93	OPEN			TBD
TBD				MMEL IG 94	OPEN			TBD
TBD				MMEL IG 95	OPEN			TBD
TBD				MMEL IG 96	OPEN			TBD

Provide changes to MMEL IG Industry Chairman - Robert.Taylor2@usairways.com

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

NOTICE
N 8000.320

Effective Date:
4/12/06
Cancellation Date:
4/12/07

SUBJ: MMEL RELIEF FOR EMERGENCY MEDICAL EQUIPMENT

1. PURPOSE. This notice provides standardized Master Minimum Equipment List (MMEL) guidance for the deferral of emergency medical equipment required by Title 14 of the Code of Federal Regulations (14 CFR) part 121, subpart X - Emergency Medical Equipment and Training. This guidance accompanies the issuance of MMEL Policy Letter (PL-73), which provides MMEL relief of first aid kit(s), an emergency medical kit (EMK), and an automated external defibrillator.

2. DISTRIBUTION. This notice is distributed to the division level in the Flight Standards Service in Washington headquarters; to the branch level in the regional Flight Standards divisions; to the Flight Standards District Offices; and to the Regulatory Standards Division at the Mike Monroney Aeronautical Center. This notice is also distributed electronically to the division level in the Flight Standards Service in Washington headquarters and to all regional Flight Standards divisions and district offices. This information is also available on the Federal Aviation Administration's (FAA) Web site at: http://www.faa.gov/library/manuals/examiners_inspectors/8000/media/N8000-320.doc.

3. BACKGROUND.

(1) On April 12, 2001, the FAA issued a final rule, 14 CFR part 121, subpart X - Emergency Medical Equipment and Training. This rule requires that passenger-carrying airplanes are equipped with approved first aid kit(s), an approved EMK, and an approved automated external defibrillator. Until the issuance of MMEL PL-73, no MMEL relief has been available for this equipment.

(2) Data collected from major air carriers, beginning in 1998, shows extremely rare use of an EMK on back-to-back flights (three occurrences in almost 6 million flights). This equates to one occurrence in 1,941,443 flight cycles or once every 27.4 months. On two of these occurrences, the EMK was replaced between flights; on the other occurrence, medical care provided by the crewmembers was not compromised because the medical supplies used on the previous flight were not needed on the subsequent fight. Diversions for medical emergencies have, in some cases, caused extreme distress on the remaining passengers due to the lack of facilities and support. The requirement for a full EMK has resulted in large delays in moving the passengers to their original destinations until a new kit could be procured.

(3) Also, recently the European Joint Aviation Authorities (JAA) has developed and implemented JAA MMEL relief for first aid kits and emergency medical kits.

4. GUIDANCE. Based upon this data, the FAA has determined that a large number of passengers may be at more risk at a diversion airport than they would be if MMEL relief for the medical equipment were provided and the aircraft was allowed to dispatch to its destination. Therefore, the FAA, within PL-73, provides MMEL relief for up to three flight cycles (three takeoffs and landings) for automated external defibrillators and an EMK. For airplanes requiring more than one first aid kit, MMEL relief is limited to only one of the required first aid kits for up to three flight cycles.

5. ACTION. Principal inspectors should review PL-73 (which can be found on the following Web site: http://www.opspecs.com/) and, upon request of their assigned operator, amend their MMEL to incorporate this guidance.

6. DISPOSITION. The material in this notice will not be incorporated into Order 8400.10, Air Transportation Operations Inspector's Handbook. Questions regarding this notice should be directed to the Air Transportation Division, AFS-200, at (202) 267-8166.

ORIGINAL SIGNED BY:

James J. Ballough
Director, Flight Standards Service

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.192

National Policy

Effective Date:
07/09/12

Cancellation Date:
07/09/13

SUBJ: Swapping Compatible Component Positions to Apply Minimum Equipment List Relief

1. Purpose of This Notice. This notice advises all principal inspectors (PI) and other assigned aviation safety inspectors (ASI) of an operator maintenance practice to swap positions of compatible components within the same aircraft to meet Master Minimum Equipment List (MMEL) dispatch configuration requirements.

2. Audience. The primary audience for this notice is certificate-holding district office (CHDO) PIs and ASIs. The secondary audience includes Flight Standards branches and divisions in the regions and at headquarters (HQ).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee Web site at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this notice on the Federal Aviation Administration's (FAA) Web site at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. A common practice of airline operators is to swap positions of compatible components within the same aircraft in order to meet their minimum equipment list (MEL) dispatch requirements. Manufacturer maintenance procedures such as the Aircraft Maintenance Manual (AMM), troubleshooting procedures, etc., may include this procedure or prohibit it. This practice should only be used until the aircraft arrives at a station where parts, equipment, and personnel are available to correct the deferred item.

5. Guidance. In the "Remarks and Exceptions" column of the MEL, a statement such as "May be inoperative on the non-flying pilot side" is an example of when the operator may swap component positions to meet MEL requirements. If the manufacturer does not publish such procedures, the operator must develop appropriate maintenance and operations procedures for their MEL management program and submit them to their PI for review. Maintenance and operations procedures must include troubleshooting (to verify that a component failure rather than a system failure caused the component to fail), operational checks, and/or deactivation and security of installed components to put the aircraft into an Airworthy condition and follow MEL deferral requirements for that item. As with all items on the MEL, the operator must correct

discrepancies within the time or calendar limit as stated in the repair category for that particular item.

> **Note:** The FAA does not permit the use of this policy for the purpose of extending MEL deferral time.

6. Action. PIs will review this notice and provide a copy to each certificate holder.

7. Disposition. We will incorporate the information in this notice into a FAA Policy Letter and FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Carrier Maintenance Branch (AFS-330) at 202-385-6425.

ORIGINAL SIGNED by

/s/ John M. Allen
Director, Flight Standards Service

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
1	4	Feb 27, 2010	Wide-Body Passenger Airplane Door/Slide Relief	X		
2	1	Aug 15, 1997	Aural and Visual Speed Warning Policy	X		
3	1	Aug 15, 1997	DME Systems MMEL Policy	X		
4			ARCHIVED – Notice 8330 – MELs for Flight Ops under Part 121 and 135 – AEA 200 Letter dated 7-7		X	
5	1	Aug 15, 1997	Takeoff Warning Systems	X		
6			ARCHIVED - Certification Guidance for Digital Engine Tachometers		X	
7			ARCHIVED - Definition of International Flight		X	
8			ARCHIVED - Minutes - Flight Ops Evaluation Policy Board		X	
9	10	Jan 18, 2012	Public Address System, Crewmember Interphone and Alerting Systems	X		
10			ARCHIVED - Magnetic Compass System		X	
11			ARCHIVED - FAR Part 23.1305g Fuel Pressure Indicators		X	
12			ARCHIVED - Request for Policy Guidance- ACE-270 memo		X	
13	1	Aug 15, 1997	Oil Temperature and Pressure Instrument MEL Policy	X		
14			ARCHIVED - Letter Singapore Airlines MEL		X	
15			Transferred to 8900.1 - Policy Regarding Continued Operations with Inoperative or Missing Equipment			X
16			Transferred to 8900.1 - Operations and Maintenance Procedures and Standardization			X

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
17			ARCHIVED - Flight Ops Policy Board Action on Agenda Items		X	
18			ARCHIVED -		X	
19			ARCHIVED - Standard Proviso for FA Seats in MMELs applicable to Part 121 Operators		X	
20			ARCHIVED - Fwd Observer Seat on Flight Deck - Oxygen Requirements - FAR Parts 121-125-135		X	
21			ARCHIVED		X	
22			ARCHIVED - Audio Control panel - Fwd Observer Seat Position - FAR Parts 121-125-135		X	
23			ARCHIVED - Approval of MEL by Principal Operations Inspectors for Part 121 and 135 Operators		X	
24	4	Nov 02, 2009	Lavatory Fire Protection	X		
25	17	Jan 20, 2011	Policy Concerning MMEL Definitions	X		
26	1	Aug 15, 1997	Thrust Reversers On Small Turbojet Airplanes	X		
27			ARCHIVED - Electrical System Requirements for Two-engine Airplanes		X	
28			ARCHIVED - Minutes of flight Ops Policy Board meeting		X	
29	5	Aug 10, 2010	MMEL Requirements for Cockpit Voice Recorder (CVR)	X		
30			ARCHIVED - Flight Instruments in the Basic T MMEL Policy		X	
31	3	Jan 20, 2011	MMEL Format Specification	X		
32	7	July 07, 2006	Traffic Alert and Collision Avoidance System (TCAS)	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
33			ARCHIVED - Policy Regarding MMEL Relief for Passenger Convenience		X	
34	4	Aug 15, 1997	MMEL and MEL Preamble	X		
35			ARCHIVED - Approval of MELs by POIs for Part 121 and 135 Operators		X	
36	2	Aug 15, 1997	FAR Part 91 MEL Approval (includes Part 91 Preamble)	X		
37			ARCHIVED - Relief for Wing-Illumination Ice Lights		X	
38	1	Aug 15, 1997	MMEL Relief for Primary Thrust Setting Instruments on Two-Engine Airplanes	X		
39	5	Jan 29, 2010	Altitude Alerting Systems	X		
40	2	Dec 3, 2009	ETOPS and Polar Operations	X		
41			ARCHIVED - Use of change bars in MEL Preparation		X	
42			ARCHIVED		X	
43	2	Dec 18, 2011	Crewmember Protective Breathing Equipment (PBE) Relief	X		
44			ARCHIVED - Items deleted from MMEL		X	
45	2	Mar 4, 2004	Time Limited Dispatch (TLD) Authorization for Full Authority Digital Electronic Control (FADEC) Engines	X		
46			Transferred to 8900.1 - Standard and Interim Revisions			X
47	2	Oct 17, 2011	Megaphone MMEL Requirements	X		
48			ARCHIVED -		X	

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
49			ARCHIVED		X	
50			ARCHIVED - Standard and Interim Revisions - Action Notice 8430-68		X	
51			ARCHIVED -		X	
52			ARCHIVED - Category D Repair Interval		X	
53			ARCHIVED - CVR MMEL Relief - No FDR Required		X	
54	10	Oct 31, 2005	Terrain Awareness and Warning System (TAWS)	X		
55			ARCHIVED – Notice Automation Process for Part 91 Operators		X	
56	5	Jan 1, 2012	Flight Deck FWD Observer Seat Relief	X		
57			ARCHIVED - Cargo Operators - Passenger Convenience Items		X	
58	4	Mar 24, 2012	Flight Deck headsets and Hand Microphones	X		
59	3	June 20, 2008	Global Change Revisions	X		
60			ARCHIVED – Test Upload		X	
61			ARCHIVED - Removal of Asterisk		X	
62			ARCHIVED - New Equipment Installation MMEL Requirements		X	
63	4	July 5, 2012	Equipment Required For Emergency Procedures	X		
64	1	Aug 15, 1997	Electrical Power MMEL Policy - Four Engine Cargo Airplanes	X		
65	1	Aug 15, 1997	Policy Regarding Cargo Provisions in the MMEL for Cargo Operations	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
66			ARCHIVED - Day of Discovery - Policy DEF		X	
67	4	Jan 15, 2012	Windshear Warning and Flight Guidance System (RWS) Windshear Detection and Avoidance System (PWS)	X		
68			Transferred to 8900.1 - Policy Regarding Use of Additional M and O			X
69	2	Sep 24, 2003	External Door Indication System	X		
70	3	Jan 20, 2011	Definitions Required in MELs	X		
71			Transferred to 8900.1 - Policy Concerning Configurations and Fleet Approval			X
72	4	Mar 12, 2012	Wing Icing Detection Lights	X		
73	5	Jun 15, 2011	MMEL Relief for Emergency Medical Equipment	X		
74			ARCHIVED - Flight Profile Advisory System		X	
75	1	Aug 15, 1997	Portable Fire Extinguisher	X		
76	5	Mar 24, 2008	ATC Transponders and Automatic Altitude Reporting Systems	X		
77	3	July 5, 2012	Cockpit and Instrument Lighting System MMEL Requirements	X		
78			ARCHIVED - MMEL Definition 23 Revision		X	
79	8	Mar 12, 2012	Passenger Seats Relief	X		
80			ARCHIVED - TCAS I Relief		X	
81	1	Aug 15, 1997	MEL CDL Operator Procedures	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
82	1	Aug 15, 1997	Use of "Operative" Terminology in MELs	X		
83	5	Jan 18, 2012	Water and Waste Relief on Air Carrier Aircraft	X		
84	1	Aug 15, 1997	Master Minimum Equipment List (MMEL) for Reduced Separation Minimum (RVSM) Operations	X		
85	4	July 5, 2012	Lavatory Door Ashtray Policy	X		
86	5	Jan 29, 2010	Policy Regarding Air Carrier Compliance with Master Minimum Equipment List (MMEL) Revisions	X		
87	10	Aug 10, 2010	Flight Data Recorder (FDR)	X		
88			Transferred to 8900.1 - Air Carrier Handling Of Equipment Discrepancies			X
89	2	Jan 31, 2009	FASTEN SEAT BELT WHILE SEATED Signs or Placards	X		
90	1	Sep 20, 2001	Pitot Heat Indicating System	X		
91			ARCHIVED - Position Lights and Strobe Lights		X	
92			ARCHIVED - Parking Brakes		X	
93	1	Sept 11, 2006	Autopilot Disconnect MMEL Policy	X		
94	1	Oct 8, 2004	Liquid or Paste Propeller Deicer	X		
95	2	Jan 15, 2012	VHF Communications MMEL Requirements	X		
96	2	Jan 29, 2010	Galley/Cabin Waste Receptacles Access Doors/Covers	X		
97	4	Sep 06, 2007	Flight Attendant Seat(s)	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
98	0	Jan 20, 1999	Navigation Databases	X		
99	2	Feb 26, 2010	Door/Slide Relief Policy	X		
100	2	Jan 20, 2009	MMEL/MEL Relief vs "Weight & Balance Manual" Limitation Statements	X		
101	2	Dec 15, 2011	Autopilot Relief	X		
102	1	Oct 17, 2011	Cargo Compartment Smoke Detection and Fire Suppression Systems	X		
103	0	Mar 21, 2000	MEL policy for 14 CFR 129 and 129.14 Foreign Air Operators	X		
104	5	Jun 15, 2011	Storage Bins /Cabin, Galley and Lavatory Storage Compartments/Closets	X		
105	1	Jan 20, 2009	Automatic Dependent Surveillance-Broadcast System	X		
106	4	Jan 18, 2012	High Frequency (HF) Communications MMEL Requirements	X		
107	1	May 22, 2001	MMEL Relief for Inoperative APU Generator	X		
108	1	Oct 17, 2011	Carriage of Empty Cargo Handling Equipment	X		
109	0	Dec 13, 2001	Supplemental Type Certificate (STC) MMEL Relief Process	X		
110			ARCHIVED - Supplemental Flight Deck Door Security Devices		X	
111	1	Jan 29, 2004	MMEL Policy for Inoperative Standby Attitude Indicator	X		
112	2	Jan 18, 2012	Relief for 14 CFR 25.795 Compliant Flight Deck Doors	X		
113	0	Dec 20, 2002	MMEL Relief for Anti-Skid Inoperative	X		
114	0	Feb 6, 2004	MMEL Policy for Inoperative Rudder Pedal Steering	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

MMEL POLICY LETTERS (PL) STATUS SUMMARY
Revision 87 (July 20, 2012)

PL	Rev.	Date	Subject	Current	Archived	XFR'd to 8900.1
115			ARCHIVED - MMEL for Chelton EFIS Equipped Aircraft		X	
116	2	Oct 17, 2011	Non-Essential Equipment and Furnishings (NEF)	X		
117	0	Oct 7, 2005	Selective Call System (SELCAL)	X		
118			ARCHIVED - Policy Regarding Nitrogen Generation System (NGS)		X	
119	3	Oct 17, 2011	Two-Section MMELs (Part 91 and Part 135)	X		
120	1	Jan 20, 2009	Emergency Locator Transmitters (ELT)	X		
121	0	Sept 06, 2007	(EFB) Electronic Flight Bag	X		
122	0	Apr 04, 2008	Flight Deck Door Surveillance Systems	X		
123	1	Apr 30, 2010	Passenger Notice System (Lighted Information Signs)	X		
124	0	Jan 20, 2009	Damaged Window/Windshield Relief	X		
125	0	Apr 1, 2010	Equipment Relief without Passengers	X		
126	0	May 28, 2010	Chelton Flight Logic Electronic Flight Instrument Systems (EFIS)	X		
127	0	June 7, 2010	Night Vision Imaging systems (NVIS)	X		
128	1	Aug 15, 2011	Wheelchair Accessible Lavatories	X		
129	0	Mar 24, 2012	Cockpit Smoke Vision Systems (CSVS)	X		

Provide changes to MMEL IG Chairman at Robert.Taylor2@usairways.com

Phone: 412-474-4355

Lead: Darrel W. Sheets, dsheets@netjets.com, 614-239-4893

Federal Aviation Administration

MMEL Policy Letter 24 Revision 5 GC D01

Date: MMM,DD,YYYY

To: All Region Flight Standards Division Managers
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply To Attn Of: Manager, Technical Programs Branch, AFS-260

MMEL GLOBAL CHANGE (GC)

This is an approved addendum to the MMEL of all aircraft. The operator may seek use of the specific relief contained in the PL by revising the Minimum Equipment List (MEL). In doing so, the applicable sample proviso stating the relief in this PL must be copied verbatim in the operator's MEL. Approval of the MEL is gained utilizing established procedures, through the assigned Principal Operations Inspector (POI). This GC expires mm/dd/yyyy.

Subject: Lavatory Fire Protection

MMEL CODE: 26 (FIRE PROTECTION)

REFERENCE: PL-24, Revision 4, dated November 02, 2009
PL-24, Revision 3, dated October 15, 2001
PL-24, Revision 2, dated August 12, 1999
PL-24, Revision 1, dated August 15, 1997
PL-24, Original, dated May 14, 1987

PURPOSE:
The purpose of this policy letter is to provide guidance to the Flight Operations Evaluation Board (FOEB) for standardized Master Minimum Equipment List (MMEL) relief for Lavatory Fire Protection systems.

DISCUSSION:

Revision 5 adds relief for lavatory fire protection that is installed in excess of regulation (14 CFR 25.854), and establishes a global change designation.

Revision 4 clarifies relief for aircraft in cargo configuration and removes the Global Change designation.

Revision 3 establishes lavatory use requirements by crewmembers due to enhanced security requirements adopted by air carriers. This revision provides guidance to crewmembers enabling them to

utilize lavatory with an inoperative smoke detection or fire extinguishing system.

Revision 2 deletes the first proviso previously incorporated under Lavatory Smoke Detection System. This revision was the result of a safety recommendation that pointed out that the fire extinguisher system was not effective in all areas of the aircraft lavatory.

Revision 1 reformatted policy letter 24 with no change to policy.

The original PL-24 was based on Amendment 121-185 to 14 CFR dated April 29, 1985, which established equipment requirements to improve cabin fire protection for passenger-carrying transport category airplanes.

POLICY:
The following revised standardized policy is established to accommodate all equipment configurations.

26 FIRE PROTECTION	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
-XX Lavatory Fire Extinguisher System				
1) Passenger Configuration	C	-	0	For each lavatory, the lavatory fire extinguisher system may be inoperative provided the associated lavatory smoke detection system operates normally. (M)(O) For each lavatory, the lavatory fire extinguisher system may be inoperative provided: a) Lavatory waste receptacle is empty, b) Associated lavatory door is locked closed and placarded, "INOPERTIVE - DO NOT ENTER", and c) Lavatory is used only by crewmembers. NOTE: These provisos are not intended to prohibit lavatory use or inspections by crewmembers.
	D	-	0	Any in excess of that required by 14 CFR may be inoperative.
2) Cargo Configuration	D	-	0	

-XX Lavatory Smoke Detection System				
1) Passenger Configuration	C	-	-	(M)(O) For each lavatory, the lavatory smoke detection system may be inoperative provided: a) Lavatory waste receptacle is empty, b) Associated lavatory door is locked closed and placarded, "INOPERTIVE - DO NOT ENTER", and c) Lavatory is used only by crewmembers. NOTE: These provisos are not intended to prohibit lavatory use or inspections by crewmembers.
	D	-	0	Any in excess of that required by 14 CFR may be inoperative.
2) Cargo Configuration	D	-	0	

Each Flight Operations Evaluation Board (FOEB) chairman should apply this policy to affected MMELs through the normal FOEB process.

/s/

(Name), Manager,
Air Transportation Division, AFS-200

Lead: Todd Schooler, TMSchooler@cessna.textron.com , 316-517-7746

Federal Aviation Administration

MMEL Policy Letter (PL) 25 Revision 18 GC D9

Date:	April 25, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply To Attn Of:	Manager, Technical Programs Branch, AFS-260

MMEL GLOBAL CHANGE (GC)

This GC is an approved addendum to all existing MMEL documents. Operators may seek use of the definitions contained in this policy letter by revising their Minimum Equipment List (MEL). In doing so, each definition must be copied as appropriate in the Operator's MEL. Approval of a revised MEL is gained utilizing established procedures, through the Operator's assigned Principal Operations Inspector (POI). **GC expiration date 4/25/2016.**

Subject: MMEL and MEL Definitions

MMEL CODE: 00 (GENERAL)

REFERENCE:
Policy Letter 25, Revision 17, dated January 20, 2011
Policy Letter 25, Revision 16, dated April 2, 2010
Policy Letter 25, Revision 15, dated November 2, 2009
Policy Letter 25, Revision 14, dated August 26, 2008
Policy Letter 25, Revision 13, dated September 11, 2006
Policy Letter 25, Revision 12, dated June 5, 2006
Policy Letter 25, Revision 11, dated July 5, 2005
Policy Letter 25, Revision 9, dated August 15,1997
Policy Letter 25, Revision 8, dated January 31, 1995

PURPOSE:

To provide a list of definitions for use in MMEL and MEL development.

DISCUSSION:

Revision 18: Removes 14 CFR Part 382 items from NEF definition #21 and adds accessible lavatory items, definition #1, listing 14 CFR Part 382 general items, and specific 382.63 and 382.71 items. Places definitions in alphabetical order. Consolidates PL-70 into Appendix B of this PL. Also adds the following definitions: Air Transport Association (ATA) System Page (#3), operative (#22), and takeoff (#25). Adds Appendix B, MEL Definition Requirements. Aligns the definitions of this PL with the definitions found in FAA Order 8900.1, volume 4, chapter 4, Section 1.

Revision 17: Adds a Note to definition 3, adds the Boeing model 747-8 to definition 23a and adds Appendix A. Definitions 22 and 24 are also modified for clarity.

Revision 16: Corrected revision bar requirement in definition #1e; deletes the Passenger Convenience definition #21; revises the Electronic Fault Alerting System for Airbus aircraft (definition #23c.); adds new MMEL definition #31 for HMV.

Revision 15: Revised definition 22.A. "Category A Repair Interval" by including a reference to "calendar days", aligning the criteria for Day of Discovery with definition 27 "Day of Discovery". A-380 aircraft added to definitions, 23c.

DISCUSSION (continued):

Revision 14: Revised definition #1a to include the listing of the repair interval categories (A, B, C and D) in column 1, revises definition #7 to align with recent ETOPS rulemaking, adds day of discovery to definition #22 Category A, adds MEL repair interval extensions information to definition #22, adds "787" to definition #23a, adds G-150 and G-200 to definition #23g, corrects NEF Definition #30 to align with FSIMS 8900.1

Volume 4 (Aircraft Equipment and Operational Authorizations) Chapter 4 (MEL and CDL) Section 11 (NEF) paragraph 4-898.

Revision 13: Added clarification to definition 10. Icing Conditions for aircraft (structural) and engines (induction) icing.

Revision 12: Added definitions for “considered Inoperative”, “is not used” and “Nonessential equipment and furnishings (NEF)”. Added the term “14 CFR” to Definition 3 (As required by FAR).

Revision 11: Added the Boeing 717 and MD-10 aircraft to the definitions Paragraph 23-b. as both aircraft are Electronic Instrument Systems (EIS) equipped aircraft. Definition 23-c (Airbus) has been revised to add A-318 to the fleet listing and clarify requirements for MAINTENANCE status (Class II) messages. Definition 23-f (Embraer EMB-145) has been revises to add applicable models EMB-135/145 and ERJ-170/190. Definition 23-g (Gulfstream) has also been revised to add applicable models G-IV, GV-SP, and GIV-X. This revision also changes MMEL Definition to Revision #11.

POLICY:

The following definitions will be used in MMELs. For MELs, certain MMEL definitions may be edited and/or not required. MEL definitions, including format issues, will be tailored, as appropriate, dependent upon the aircraft operator’s make/model of aircraft, type of installed instrument and equipment items, and specific operation. However, the intent of the definition must be the same and cannot be less restrictive than the MMEL. See FAA Order 8900.1, volume 4, chapter 4 for further information.

Note: For MEL development, Appendix A may be used to identify the applicable CFRs for MMEL items that use terms such as “As required by 14 CFR” or “Any in excess of those required by 14 CFR may be inoperative”. Appendix A is not a complete list of CFRs and is not to be included in the aircraft operator’s MEL.

Note: See Appendix B for specific MEL definition requirements. Appendix B is not required to be included in the aircraft operator’s MEL.

1. Accessible Lavatory Items. Under 14 CFR § 382.63, accessible lavatory items include: ability to enter lavatory and maneuver by means of on-board wheelchair. The lavatory shall provide accessible door locks, call buttons, grab bars, faucets, other controls, and dispensers. As an air carrier, you must maintain all aircraft accessibility features in proper working order, per 14 CFR § 382.71 The accessible lavatory requirement, in part, applies to aircraft with more than one isle in which lavatories are provided per § 382.63(a). Aircraft operators are not required to retrofit cabin interiors of existing aircraft to comply with the requirements of § 382.63.

2. Administrative Control Item (ACI). An ACI is listed by the aircraft operator in the MEL for tracking and informational purposes. As an example, ACI may be used to track ETOPS accomplishment of required APU cold-soak, or in-flight verification starts. An ACI may be added to an aircraft operator’s MEL by approval of the POI provided no relief is granted, or provided conditions and limitations are contained in an approved document (e.g., Structural Repair Manual (SRM) or Airworthiness Directive (AD)). If relief other than that granted by an approved document is sought for an ACI, a request must be submitted to the Administrator. If the request results in review and approval by the FOEB, the item becomes an MMEL item rather than an ACI.

3. Air Transport Association (ATA) System Page. The ATA system page is divided into four (4) columns and contains: item; number installed; number required for dispatch; and remarks or exceptions. Standard ATA categories are used. Items are numbered sequentially.

A. Item. This column depicts the equipment, system, component, or function listed in the “Item” column.

B. Repair Category. See definition #24.

C. Number Installed. This column depicts the number (quantity) of instrument and equipment items normally installed in the aircraft. This number represents the aircraft configuration considered in developing this MMEL. Should the number be a variable (e.g., fleet configuration differences, cockpit lighting items, cabin lighting items, cargo restraint components) a number is not required and the "-" symbol is used.

D. Number Required for Dispatch. This column depicts the minimum number (quantity) of instrument and equipment items required for operation provided the conditions specified in the "Remarks or Exceptions" column are met.

E. Remarks or Exceptions. This column may include a statement(s) either prohibiting or permitting operation with a specific number of instrument and equipment items inoperative, provisos (conditions and limitations) for such operation, and appropriate notes.

F. Provisos. Provisos are indicated by a number or a lower case letter in "Remarks or Exceptions". Provisos are conditions or limitations that must be complied with for operation with the listed instrument or equipment item inoperative.

G. Notes. Notes provide additional information for crewmember or maintenance consideration. Notes are used to identify applicable material, which is intended to assist with compliance, but do not relieve the aircraft operator of the responsibility for compliance with all applicable requirements. **Additional notes may be amended, deleted, or added to the MEL by the** aircraft operator**, as appropriate.** Notes are not a part of the provisos.

H. Vertical Bar (change bar). Indicates a change, addition, or deletion in the adjacent text for the current revision of that page only. All change bars applicable to the previous revision of the MMEL are removed prior to the release of the next revision.

4. Airplane Flight Manual (AFM), Rotorcraft Flight Manual (RFM). The FAA-approved AFM/RFM is the document approved by the responsible FAA Aircraft Certification Office (ACO) during type certification. The approved flight manual for the specific aircraft is listed on the applicable Type Certificate Data Sheet (TCDS). The approved flight manual is the source document for operational limitations and performance parameters for an aircraft. The term "approved flight manual" can apply to either an AFM or an RFM. The FAA requires an approved flight manual for aircraft type certification.

5. As Required by 14 CFR. When the MMEL states, "As Required by 14 CFR," the listed instrument or equipment item is subject to certain provisions (restrictive or permissive) expressed in the 14 CFR operating rules. The number of items required by 14 CFR must be operative. When the listed item is not required by 14 CFR, it may be inoperative for the time specified by repair category. The term "14 CFR" has replaced "FAR" as the current reference to Federal Regulations pertaining to aviation. However, many, if not most, MMELs still contain the acronym "FAR"; therefore, this acronym is acceptable and retained in PL-025 and this definition.

6. Code of Federal Regulations (CFR) and Federal Aviation Regulations (FAR). CFR, the current term, and FAR both refer to the applicable portions of the Federal Aviation Act and Code of Federal Regulations.

7. Considered Inoperative. The phrase, "Considered Inoperative", as used in the provisos, means that an instrument and equipment item must be treated for dispatch, taxi and flight purposes as though it were inoperative. The item will not be used or operated until the original deferred item is repaired. Additional actions include: documenting the item on the dispatch release (if applicable), placarding, and complying with all remarks, exceptions, and related MMEL provisions, including any (M) and (O) procedures and observing the repair category.

8. Continuing Authorization – Single Extension. An aircraft operator who has the authorization to use an FAA-approved MEL may also have the authority to use a continuing authorization to approve a single (one-time) extension to the maximum repair interval for category B or C items (3 days and 10 days, respectively) in accordance with Operations Specification D095. Continuing Authourization – Single Extension is not authorized for category A and D items.

9. Dash (-). Indicates a variable number (quantity) of the instrument and equipment items may be installed or required for dispatch. This is common when a fleet MEL is used since aircraft of the same make and model may have differing numbers of specific instrument and/or equipment items installed.

10. Day of Discovery. This is the calendar-day an equipment/instrument malfunction was recorded in the aircraft maintenance record/logbook. This day is excluded from the calendar-days or flight-days specified in the MMEL for the repair interval of an inoperative instrument and/or equipment item. This provision is applicable to all MMEL items; i.e., categories A, B, C, and D.

11. Deactivated and/or Secured. When the MMEL refers to an instrument and/or equipment item as deactivated and/or secured, the specified component must be put into an acceptable condition for safe flight. An acceptable method of deactivating and/or securing will be established by the aircraft operator.

12. Deleted. "Deleted" in the remarks column after a sequence item indicates that the item was previously listed but is now required to be operative if installed in the aircraft.

13. Extended Range Operations (ER). ER refers to extended range operations (ETOPS) of an airplane with operational approval to conduct ETOPS in accordance with the applicable regulations.

14. Excess Items. Excess items are those instrument and equipment items that have been installed that are redundant to the requirements of the 14 CFR.

15. Flight Day. A flight-day is a 24-hour period (from midnight to midnight) either universal coordinated time (UTC) or local time, as established by the aircraft operator, during which at least one flight is initiated for the affected aircraft.

16. Heavy Maintenance Visit (HMV). HMV is a scheduled C-check/D-check or airworthiness maintenance program inspection where the aircraft is scheduled to be out of service for 4 or more days.

17. Icing Conditions. An atmospheric environment that may cause ice to form on the aircraft (structural) or in the engine(s) (induction).

18. Inoperative. A system and/or component malfunction to the extent that it does not accomplish its intended purpose and/or is not consistently functioning normally within its approved operating limit(s) and/or tolerance(s).

19. Inoperative Components of an Inoperative System. Inoperative instrument and equipment items, which are components of a system that is inoperative, are usually considered components directly associated with and having no other function than to support that system (warning/caution systems associated with the inoperative system must be operative unless relief is specifically authorized per the MMEL).

20. Is Not Used. The phrase "Is Not Used" in the provisos, remarks or exceptions for an MMEL instrument or equipment item may specify that another item in the MMEL "is not used". In such cases, crewmembers must not activate, actuate, or otherwise utilize that item under normal operations. It is not necessary for the aircraft operators to accomplish the (M) procedures associated with the instrument or equipment item. However, operational requirements must be complied with, and an additional placard must be affixed, to the extent practical, adjacent to the control or indicator for the item that is not used. This informs crewmembers that an instrument or equipment item is not to be used under normal operations.

21. Nonessential Equipment and Furnishings (NEF). NEFs are those items installed on the aircraft as part of the original type certification, STC, or other form of alteration that have no effect on the safe operation of flight and would not be required by the applicable certification rules or operational rules. They are those items that, if inoperative, damaged, or missing, have no effect on the aircraft's ability to be operated safely under all operational conditions. NEF items are not instrument and equipment items already identified in the MEL or CDL of the applicable aircraft. They do not include instrument and equipment items that are functionally required to meet the certification rule or for compliance with any operational rule.

22. Operative. An operative system and/or component will accomplish its intended purpose and is consistently functioning normally within its design operating limit(s) and tolerance(s). When an MMEL item specifies that an item of equipment must be operative, it does not mean that it's operational status must be verified; it's to be considered operative unless reported or known to be malfunctioning. When an MMEL item specifies that an item of equipment must be verified operative, it means that it must be checked and confirmed operative at the interval(s) specified for that MMEL item. When an MMEL item specifies that an item of equipment must be verified but no interval is specified, verification is required only at the time of deferral.

Other terminology sometimes used interchangeably with "operative" within the MMEL is "operates normally", "fully operative", and "considered operative". The aircraft operator's MEL may incorporate standardized terminology of the aircraft operator's choice to specify that an item of equipment must be operative, provided the aircraft operator's MEL definitions indicate that the selected "operative" terminology means that the required item of equipment will accomplish its intended purpose and is consistently functioning normally within its design operating limit(s) and tolerance(s).

23. Placarding. Each inoperative instrument or equipment item must be placarded to inform and remind the crewmembers and maintenance personnel of the item condition. To the extent practical, placards should be located adjacent to the control or indicator for the item affected; however, unless otherwise specified, placard wording and location will be determined by the aircraft operator.

24. Repair Category. All users of an MEL approved under parts 91K, 121, 125, 129, 135 and 142 must effect repairs of inoperative instrument and equipment items, deferred in accordance with the MEL, at or prior to the repair times established by the following letter designators. Part 91 MEL users (D095/D195 LOAs) are not required to comply with the repair categories, but will comply with any provisos defining a repair interval (flights, flight legs, cycles, hours, etc):

A. Repair Category A. This category item must be repaired within the time interval specified in the "Remarks or Exceptions"column of the aircraft operator's approved MEL.

B. Repair Category B. This category item must be repaired within 3 consecutive calendar-days (72 hours) excluding the day the malfunction was recorded in the aircraft maintenance record/logbook. For example, if it were recorded at 10 a.m. on January 26th, the 3-day interval would begin at midnight the 26th and end at midnight the 29th.

C. Repair Category C. This category item must be repaired within 10 consecutive calendar-days (240 hours) excluding the day the malfunction was recorded in the aircraft maintenance record/logbook. For example, if it were recorded at 10 a.m. on January 26th, the 10-day interval would begin at midnight the 26th and end at midnight February 5th.

D. Repair Category D. This category item must be repaired within 120 consecutive calendar-days (2880 hours), excluding the day the malfunction was recorded in the aircraft maintenance record/logbook.

25. Takeoff. The act of beginning a flight in which an aircraft is accelerated from a state of rest to that of flight. For the purposes of MEL relief, this translates to the point at which power is applied to begin the takeoff roll from the end of the runway or takeoff surface.

26. Triple Asterisk (***). Indicates an item which is not required by regulation but which may have been installed on some models of aircraft covered by this MMEL. This item may be included on the **aircraft operator**'s MEL after the approving office has determined that the item has been installed on one or more of the **aircraft operator**'s aircraft. The symbol, however, must not be carried forward into the **aircraft operator**'s MEL. It should be noted that neither this policy nor the use of this symbol provides authority to install or remove an item from an aircraft.

27. Visible Moisture. An atmospheric environment containing water, in any form, that can be seen in natural or artificial light; for example, clouds, fog, rain, sleet, hail, or snow.

28. Visual Flight Rules (VFR). VFR is as defined in 14 CFR Part 91. This precludes a pilot from filing an Instrument Flight Rules (IFR) flight plan.

29. Visual Meteorological Conditions (VMC). VMC means the atmospheric environment is such that would allow a flight to proceed under the visual flight rules applicable to the flight. This does not preclude operating under Instrument Flight Rules.

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.

31. (O). This symbol indicates a requirement for a specific operations procedure which must be accomplished in planning for and/or operating with the listed item inoperative. Normally, these procedures are accomplished by the flightcrew; however, other personnel may be qualified and authorized to perform certain functions. The satisfactory accomplishment of all procedures, regardless of who performs them, is the responsibility of the aircraft operator. Appropriate procedures are required to be produced as a part of the aircraft operator's manual or MEL.

32. Electronic Fault Alerting System. New generation aircraft display system fault indications to the flight crew by use of computerized display systems. Aircraft manufacturers incorporate individual design philosophies when determining the data that is represented. The following are customized definitions (specific to each manufacturer) to help determine the level of messages affecting the aircraft's dispatch status.

A. AIRBUS (A300-600, A310, A318/319/320/321, A330, A340, A380)

Airbus aircraft equipped with Electronic Centralized Aircraft Monitoring (ECAM) provide different levels of system condition messages {WARNING (red), CAUTION (amber)}. On A318/319/320/321, A330 and A340, the ECAM STATUS page also provides MAINTENANCE STATUS messages. Any message that affects airplane dispatch is displayed at the WARNING or CAUTION level. For A318/319/320/321, MAINTENANCE STATUS messages may also affect airplane dispatch. System faults that result only in messages on the Central Maintenance System (CMS) (for A330, A340 and A380) or on the Centralized Fault Display System (CFDS) (for A318/319/320/321) do not affect airplane dispatch and do not require action other than as addressed within the aircraft operator's standard maintenance program.

B. BOEING (B-717, MD-10, MD-11)

These aircraft are equipped with an alerting function which is a subsystem within the Electronic Instrument System (EIS). The alerting function provides various levels of system condition alerts (WARNING, CAUTION, ADVISORY, MAINTENANCE and STATUS). Alerts that affect aircraft dispatch will include WARNING, CAUTION, STATUS or MAINTENANCE level. MAINTENANCE alerts are displayed on the status page of the EIS display panel under the maintenance heading. A MAINTENANCE alert on the EIS indicates the presence of a system fault which can be identified by the Central Fault Display System (CFDS) interrogation. The systems are designed to be fault tolerant, however, for any MAINTENANCE alert, the MEL must be verified for dispatch purposes.

C. BOEING (747-400, 747-8, 757, 767, 777, 787)

Boeing airplanes equipped with Engine Indicating and Crew Alerting Systems (EICAS) provide different priority levels of system messages (WARNING, CAUTION, ADVISORY, STATUS and MAINTENANCE). Any messages that affect airplane dispatch status will be displayed at a STATUS message level or higher. The absence of an EICAS STATUS or higher level (WARNING, CAUTION, ADVISORY) indicates that the system/component is operating within its approved operating limits or tolerances. System conditions that result only in a maintenance level message, i.e. no correlation with a higher level EICAS message, do not affect dispatch and do not require action other than as addressed within an aircraft operator's standard maintenance program.

D. CANADAIR (CL-65, CL-604)

Canadair aircraft equipped with Engine Indication and Crew Alerting Systems (EICAS) provide four classes of messages (WARNING, CAUTION, ADVISORY, and STATUS). Any message that affects aircraft dispatch will be at the WARNING, CAUTION, or STATUS level. System conditions that only require maintenance are not visible to the flight crew. These maintenance indications/messages are only activated by maintenance personnel using the Maintenance Diagnostics Computer.

E. De-HAVILLAND (DASH 8 SERIES 400)

Lead: Todd Schooler, TMSchooler@cessna.textron.com , 316-517-7746

Series 400 aircraft are equipped with a Caution/Warning Panel that annunciates all cautions and warnings. Advisory messages are displayed by the Electronic Indication System (EIS) or individual advisory lights supplied in the cockpit. "Class 1 failures" are failures that prevent continued operation of a specific Line Replacement Unit or channel and are annunciated via advisory messages: caution, warning or advisory lights in the flight compartment. Dispatch with such posted failures are to be in accordance with the MMEL. "Class 2 failures" are failures which do not prevent continued system function. These faults will not be annunciated to the flight crew and the absence of the higher level alert (warning, caution, advisory) indicates that the system/component is operating within its approved operating limits or tolerances. Such faults would be evident during maintenance interrogation performed during maintenance activities. Class 2 faults do not affect dispatch and will be listed in the Fault Isolation Manual (FIM). Class 2 faults will be left to the discretion of the aircraft operators when these faults are to be rectified.

F. EMBRAER (EMB-135/145, ERJ-170/190 Series)

The EMB-135/145 and ERJ-170/190 are equipped with an Engine Indicating and Crew Alerting System (EICAS) that provides three different message levels: WARNING, CAUTION, and ADVISORY. The ERJ-170/190 Series add STATUS messages. Failures that effect dispatchability are presented to the flight crew at one of these levels. Other failures may be presented only to the maintenance personnel on the Multi Function Display (MFD) maintenance pages or through the download of the Central Maintenance Computer (CMC). System conditions that result only in a maintenance level message, i.e. no correlation with a higher level EICAS message, do not affect dispatch and do not require action other than as addressed within an aircraft operator's standard maintenance program.

G. FOKKER (FK-100)

Fokker aircraft are equipped with Multi Function Display System (MFDS) which provides electronic message referring to the different priority levels of system information (WARNING (red), CAUTION (amber), AWARENESS (cyan) AND STATUS (white). Any messages that affect aircraft dispatch will be at the WARNING, CAUTION or AWARENESS level. In these cases, the MEL must be verified for dispatch capability and maintenance may be required. System conditions that only require maintenance are not presented on the flight deck. These maintenance indications/messages may be presented on the Maintenance & Test Panel (MAP) or the Centralized Fault Display Unit (CFDU) and by dedicated Built-In Test Evaluation (BITE) of systems.

Lead: Todd Schooler, TMSchooler@cessna.textron.com , 316-517-7746

H. GULFSTREAM G-IV, G-V, GV-SP,GIV-X, GVI

Gulfstream airplanes equipped with EICAS provide different priority levels of system messages: WARNING (red), CAUTION (amber), ADVISORY, STATUS and MAINTENANCE (cyan or blue). STATUS messages on the GVI EICAS are white. Any WARNING or CAUTION message affects airplane dispatch status and requires that the Airplane Flight Manual or the MEL be used to determine dispatch capability. STATUS messages which indicate a system failure (e.g., FMS 1 fail) require that the Airplane Flight Manual or the MEL be used to determine dispatch capability. MAINTENANCE messages do not affect airplane dispatch status. They indicate the presence of a system fault which can be identified by Maintenance Data Acquisition Unit (MDAU on the G-V) interrogation, Central Maintenance Computer (CMC on the GV-SP/GIV-X/VI) interrogation or by reference to the Airplane Flight Manual.

I. GULFSTREAM G-150, G-200

Gulfstream airplanes equipped with EICAS provide different priority levels of system messages: WARNING (red), CAUTION (amber), ADVISORY (green), and STATUS (white). The Airplane Flight Manual prohibits take off with any WARNING message displayed. CAUTION, ADVISORY and STATUS messages may affect airplane dispatch status and requires the Airplane Flight Manual or the MEL be used to determine dispatch capability. The airplane may dispatch with CAUTION, ADVISORY and STATUS messages that indicate proper system operation and are not illuminated due to a system failure (i.e. FUEL STBY PUMP ON when the pump is selected ON, GND A/B OUT with LAND selected on the ground, or APU GEN OFF with the switch OFF). MAINTENANCE and MAINTENANCE DATA STATUS messages do not affect airplane dispatch status. They indicate the presence of a system fault which can be retrieved from the Maintenance Diagnostics Computer. In all cases, the Airplane Flight Manual must be referenced and procedures compiled with for the displayed message prior to applying MEL dispatch relief.

J. GULFSTREAM G280

Gulfstream airplanes equipped with EICAS provide different priority levels of system messages: WARNING (red), CAUTION (amber), ADVISORY and MAINTENANCE (cyan or blue), and STATUS (white). Any WARNING or CAUTION message affects aeroplane dispatch status and requires that the Aeroplane Flight Manual or the MEL be used to determine dispatch capability. ADVISORY messages which indicate a system failure (e.g., FMS 1 fail) require that the Aeroplane Flight Manual or the MEL be used to determine dispatch capability. MAINTENANCE messages do not affect aeroplane dispatch status. They indicate the presence of a system fault which can be identified by Onboard Maintenance System (OMS) interrogation or by reference to the Aeroplane Flight Manual. STATUS messages do not affect the dispatch status. They indicate the status of a system.

John S. Duncan
Manager, Air Transportation Division

PL-025 Appendix A Applicable Sections in 14 CFR Parts 91, 121, 125, 129, 135 Current as of June 7, 2010 **THIS LISTING IS FOR GUIDANCE ONLY.** Any questions regarding the applicability of a particular regulation should be resolved by a review of the regulation involved.			
ATA CH. #	**PL-#**	**ITEM**	**14 CFR REFERENCES**
ATA 21		Ozone Converters	121.578
ATA 23	029	Cockpit Voice Recorder (CVR) System	91.609, 91.1045, App E 121.359 125.227 129.24 135.151
	058	Flight Deck Headsets/Headphones	91.511 121.318, 121.349, 121.359 125.203, 125.227 135.151, 135.165
	106	High Frequency (HF) Communication Systems	91.511 121.345, 121.347, 121.349, 121.351 125.203 135.98, 135.165
		Passenger Address System	121.318
	SATCOM	Satellite Communication System	121.99, 121.122, 121.345, 121.347, 121.349, 121.351 125.203 135.98, 135.165
	095	VHF and UHF Communications Systems	91.126, 91.127, 91.129, 91.130, 91.131, 91.135, 91.205, 91.511 121.345, 121.347, 121.349, 121.351 125.203 129.17 135.161 135.165
ATA 25		Crash Ax/Crow Bar	91.513 121.309 125.207 135.177
	120	Emergency Locator Transmitter (ELT)	91.205, 91.207 121.353, 121.339
	073	Emergency Medical Equipment (AED, EMK, FAK)	91.513 121.803 125.207 135.177
		Extended Overwater Equipment (Emergency, Flotation, Survival)	91.205, 91.509 121.339, 121.340 125.209 135.167
		Flashlight Stowage/Charger Assemblies (Including Flashlights)	121.310, 121.549 135.107, 135.178
	097	Flight Attendant Seat Assembly (Single or Dual Position)	91.533 121.391 125.269 135.107

ATA 25 (cont'd)	047	Megaphones	91.513 121.309 125.207
	056	Observer Seat	Aircraft operated under Part 91 are not required to have an observer seat 135.75
ATA 26	075	Portable Fire Extinguishers	91.513, 91.525 121.309 125.119 135.155
ATA 31		Clocks	91.205
	087	Flight Data Recorder (FDR) System	91.609, 91.1045, App E 121.343, 121.344, 121.344a 125.225, 125.226 129.20 135.152
ATA 33	123	Passenger Notice System (Lighted Information Signs)	91.517 125.207, 125.217 135.127, 135.177
	72	Wing Icing Detection Lights	91.527 121.321, 121.341
ATA 34		ADF Systems	91.205 121.347, 121.351 125.203
	039	Altitude Alerting System	91.219, App G
	076	ATC Transponder/Automatic Altitude Reporting Systems	91.130, 91.131, 91.135, 91.215, App G (RVSM)
	105	Automatic Dependent Surveillance - Broadcast (ADS-B) System	None
	003	Distance Measuring Equipment (DME)	91.205 121.349 125.203 129.17
		Flight Management Computer System (FMCS	91.205 121.347, 121.349, 121.351 125.203 129.17 135.161, 135.165
	054, 067	Ground Proximity Warning System (GPWS)	91.223, 91.1045 121.354, 121.358 135.154
		Instrument Landing System (ILS)	121.347, 121.349 129.17 135.165
		Long Range Navigation Systems (GPS, INS, Loran, Omega)	121.351, 121.355 125.267
		Marker Beacon System	Part 91 App A (Cat II Operations) 121.349 125.203 129.17 135.165
	111	Standby Attitude Indicator	91.205, 91.507 121.305 135.149, 135.159

ATA 34 (cont'd)		Thunderstorm Detection	14 CFR 135.173
	032	Traffic Collision and Avoidance System (TCAS)	91.221, 91.1045, App G (RVSM) 121.356 125.224 129.18 135.180
		VOR Navigation Systems	91.131, 91.205, 91.511 121.345, 121.347, 121.349, 121.351 125.203 129.17 135.161 135.165
	067	Weather Radar System	91.1045 121.357, 121.358 125.223 135.175
ATA 35		Oxygen System (Chemical or Gaseous)	91.211 121.329, 121.333, 121.574 125.219 135.157
		Portable Oxygen Dispensing Units (Or Equivalent) (Bottle and Mask)	121.329, 121.333
	043	Protective Breathing Equipment (PBE)	121.337

Lead: Todd Schooler, TMSchooler@cessna.textron.com , 316-517-7746

PL-025 Appendix B
MEL Definition Requirements

NOTE: This appendix is not required to be in an aircraft operator's MEL

Definition	Requirement	Notes*
1. Accessible Lavatory Items	Required*	Refer to § 382.63(c)
2. Administrative Control Item (ACI)	Optional	Definition is required only if used in the MEL.
3. Air Transport Association (ATA) System Page	Required	
3A. Item	Required	
3B. Repair Category	Required	14 CFR Part 91 aircraft operators are not required to use Repair Categories
3C. Number Installed	Required	
3D. Number Required for Dispatch	Required	
3E. Remarks or Exceptions	Required	
3F. Provisos	Required	Must be carried over either verbatim from the MMEL into the MEL or by using equivalent terminology.
3G. Notes	Required	
3H. Vertical Bar (change bar)	Required	
4. Airplane Flight Manual (AFM) or Rotorcraft Flight Manual (RFM)	Required*	The appropriate document (AFM or RFM) must be indicated.
5. As required by 14 CFR	Not Used*	The current term is 14 CFR. This term is not used in MELs. MELs must contain the appropriate regulatory requirement and procedures supporting it.
6. Code of Federal Regulations (CFR)	Optional	
7. Considered Inoperative	Required	
8. Continuing Authorization	Required	
9. Dash (-)	Optional*	Definition is required only if the (-) is used in the MEL.
10. Day of Discovery	Required	
11. Deactivated and/or Secured	Required	
12. Deleted	Optional	
13. Extended Range Operations (ER)	Required*	For aircraft operated under ETOPS rules.
14. Excess Items	Optional*	Definition is required only if used in the MEL.
15. Flight Day	Required	
16. Heavy Maintenance Visit (HMV)	Optional*	Required only if used in the MEL. The definition should indicate the type of maintenance program the airplane is under.

17. Icing Conditions	Required	
18. Inoperative	Required	
19. Inoperative Components of an Inoperative System	Required	
20. Is Not Used	Required	
21. Nonessential Equipment and Furnishings (NEF)	Required	
22. Operative	Required*	The aircraft operator's MEL may incorporate standardized terminology of their choice, to specify that an item of equipment must be operative, provided their MEL definitions indicate that the selected "operative" terminology means that the required item of equipment will accomplish its intended purpose.
23. Placarding	Required	
24. Repair Category	Required*	Required for part 121, 125, 129, 135 and 142; not required for part 91 & 137
24A. Repair Category A	Required*	Required for part 121, 125, 129, 135 and 142; not required for part 91 & 137
24B. Repair Category B	Required*	Required for part 121, 125, 129, 135 and 142; not required for part 91 & 137
24C. Repair Category C	Required*	Required for part 121, 125, 129, 135 and 142; not required for part 91 & 137
24D. Repair Category D	Required*	Required for part 121, 125, 129, 135 and 142; not required for part 91 & 137
25. Takeoff	Required	
26. Triple Asterisk (***)	Not used	
27. Visible Moisture	Required	
38. Visual Flight Rules (VFR)	Required	
29. Visual Meteorological Conditions (VMC)	Required	
30. (M)	Required	
31. (O)	Required	
32. Electronic Fault Alerting System – General	Optional*	When preparing the MEL document, aircraft operators are to select the proper Definition No. 32 for their aircraft, if appropriate.

* See Notes

Federal Aviation Administration

MMEL Policy Letter (PL) 56, Revision 5

Date:	January1, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Flight Deck FWD Observer Seat

MMEL CODE: 25 (EQUIPMENT & FURNISHINGS)

REFERENCE: **PL-56, Revision 4 GC, dated September 15,2004**
PL-56, Revision 3, dated January 16, 2001, signed by Gregory L. Michael
PL-56, Revision 2, dated August 15, 1997
PL-56, Revision 1, dated June 29, 1995, signed by David R. Harrington
PL-22, Revision Original, dated July 19, 1985, signed by John S. Kern
PL-20, Revision Original, dated May 17, 1985

PURPOSE:
To establish standardized Master Minimum Equipment List (MMEL) relief for the flight deck observer seat(s).

DISCUSSION:

Revision 5 omits the Global Change (GC) designation for this PL. If the MMEL used by operators as an MEL, or used to create an MMEL has not been revised since 01/01/2000, operators may continue to use PL-56 Rev 4 in their MEL.

Revision 4 adds additional MMEL relief for the flight deck observer seat(s) installed on aircraft operated under 14 CFR 91. Aircraft operated under 14 CFR 91 are not required to have an observer seat(s), therefore, the Remarks/Exceptions need to reflect these differences.

Revision 3 standardized the “Purpose” statement, deleted "OR" and "(2)" from provisos, revised previous proviso e) into two provisos and deleted "May be inoperative" from sub-item 2).

Revision 2 reformatted and incorporated previous policy letters 20 and 22 regarding the observer seat associated equipment, oxygen system and audio control panel.

The standard MMEL proviso for the Forward Observer Seat (14 CFR 121.581) as contained in Notice 8430.40 dated June 19, 1991, is amended as set forth in the new proviso herein. During the period when the MMEL proviso as described in Notice 8430.40 dated June 19,1991, was in effect, a number of inquiries were made by the Federal Aviation Administration (FAA) field offices and some air carriers which required explanation. Based on those inquiries and requests from the air carrier industry, changes have been made as clarifying in nature. This change provides standard relief for aircraft with a single forward observer seat and aircraft with a forward and second observer seat on the flight deck. Any additional seats or equipment on the flight deck not encompassed by this proviso will be reviewed by the Flight Operations Evaluation Board (FOEB) for inclusion in the MMEL. Also, this change provides for the inspector to decide whether to occupy an observer seat by accepting certain defects, such as lights or other non-safety item(s) that would not adversely affect the performance of official duties.

POLICY:

The following standard MMEL proviso is established to provide limited relief for the forward observer seat, the observer seat (primary), or the observer seat selected by the Administrator, including associated equipment. Observer seat associated equipment is defined as all systems or components used in support of or in conjunction with the seat, i.e., audio selector panel, oxygen system, microphone, headset, lights, etc. This change provides the inspector an option, to occupy the forward observer seat or the second observer seat (if installed) with certain non-safety equipment inoperative when the inspector has determined that the official duty can be accomplished.

The pilot in command (PIC) will determine if either observer seat may be occupied with certain non-safety equipment inoperative for persons, other than FAA inspectors, authorized by the air carrier.

Air carrier check airman may occupy an observer seat with certain non-safety equipment inoperative when it has been determined by the PIC that the flight check can be accomplished safely.

The described options to occupy the forward or second observer seat do not in any way alter the established repair interval.

Each FOEB chairman is to take appropriate action to have all applicable MMELs amended to include the following proviso for the forward observer seat as provided by 14 CFR 121.581, 125.317(b), and 135.75(b). The FOEB will also review any additional observer seats and equipment on the flight deck not encompassed by this proviso for inclusion in the MMEL. Except as provided herein, it is not intended that any existing MMEL relief for certain equipment on the flight deck be removed as a result of this proviso. Principal inspectors may amend assigned air carrier MELs in accordance with this policy letter when requested by the certificated operator/air carrier.

25 (EQUIPMENT &
FURNISHINGS)

25-XX Observer Seat(s)

1)	Primary Observer Seat (including associated equipment)	A	-	-	May be inoperative provided: a) A passenger seat in the passenger cabin is made available to an FAA inspector for the performance of official duties, and b) Repairs are made within two flight days.
		A	-	-	May be inoperative provided: a) Secondary observer's seat is available to the FAA inspector for the performance of official duties, and b) Repairs are made within two flight days.
		A	-	-	May be inoperative provided: a) Required minimum safety equipment (safety belt and oxygen) is available, b) Seat is acceptable to the FAA inspector for performance of official duties, and c) Repairs are made within two flight days. NOTE 1: These provisos are intended to provide for occupancy of the above seats by an FAA inspector when the minimum safety equipment (oxygen and safety belt) is functional and the inspector determines the conditions to be acceptable. NOTE 2: The pilot-in-command will determine if the minimum safety equipment is functional for other persons authorized to occupy any observer seat(s).
*** 2)	Additional Observer Seat(s) (including associated equipment)	D	-	0	NOTE: The pilot-in-command will determine if the minimum safety equipment is functional for other persons authorized to occupy any observer seat(s).
3)	Observer Seat Not Required by FAR (including associated equipment)	D	-	0	NOTE: The pilot-in-command will determine if the minimum safety equipment is functional for other persons authorized to occupy any observer seat(s).

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ G Kirkland for
John S. Duncan
Manager, Air Transport Division

Federal Aviation Administration

MMEL Policy Letter (PL) 67, Revision 4

Date:	**January 15, 2012**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply To Attn Of:	Manager, Technical Programs Branch, AFS-260

Subject: Windshear Warning and flight Guidance System (RWS) Windshear Detection and Avoidance System (PWS)

MMEL CODE: 34 (NAVIGATION) or 22 (AUTO FLIGHT)

REFERENCE: **PL-67, Revision 3, dated December 5, 2005**
PL-67, Revision 2, dated November 20, 2000
PL-67, Revision 1, dated August 15, 1997
PL-67, Original, dated December 23, 1993
14 CFR § 121.358

PURPOSE:

To establish standardized Master Minimum Equipment List (MMEL) relief for RWS and PWS Systems.

DISCUSSION:

Revision 4 omits the Global Change (GC) designation for this PL.

Revision 3 adds limited relief when the PWS and the Ground Proximity Warning System (GPWS) Windshear Mode (Reactive) are inoperative at the same time. Revision 3 also clarifies that the windshear systems may not be part of the GPWS or the Weather Radar system.

Revision 2 combined information and policy for approved airborne detection and avoidance systems (Predictive Windshear).

Revision 1 reformatted the original PL- 67 with no change to policy.

Title 14 of the Code of Federal Regulations (14 CFR) § 121.358, sets forth requirements for part 121 operators to have their aircraft equipped with either an approved airborne RWS (reactive system), an approved airborne PWS (predictive system), or an approved combination of these systems. This PL provides minimum equipment list relief for low-altitude windshear system on air carrier aircraft.

Some RWS (Reactive) have been designed to be a function of the GPWS. While some PWS (Predictive) have been designed to be a function of the Weather Radar System, not all windshear system designs are a function of the GPWS or Weather Radar system. The Flight Operations Evaluation Board (FOEB) Chairmen should determine the appropriate ATA chapter location for the MMEL provisions.

Windshear has contributed to aircraft accidents. Windshear accidents peaked in the mid-1970's and early 1980's. In the late 1980's, the FAA took steps to reduce the rate of windshear accidents by mandating windshear training and the implementation of RWS. Although the combined effect of the training and RWS usage has significantly reduced the rate of windshear accidents, RWS does not provide visibility prior to entering windshear. RWS provides flight crews with a way to positively identify a windshear after entering it, but does not provide a way to avoid it.

Ground based systems that can detect windshear before an aircraft enters it, such as Low Level Windshear Avoidance (LLWAS) and Terminal Doppler Weather Radar (TDWR), are limited to airports where they are installed. Recent technology improvements have led to the development and introduction of airborne Doppler weather radar systems known as PWS that can detect windshear and provide warnings (aural and visual) before the airplane enters it. Predictive windshear is expected to further reduce accidents attributed to windshear.

POLICY:

FOEB chairmen should provide MMEL relief for those aircraft that have low-altitude windshear system equipment installed in accordance with 14 CFR § 121.358. They should review the various windshear system designs applicable to the airplane model and list the MMEL provisions as appropriate. If the RWS (Reactive) is a function of the GPWS (Windshear Mode), refer to MMEL Policy Letter 54.

The Principal Operations Inspector (POI) will ensure an operator's alternate procedures are comprehensive and appropriate for dispatch with Windshear Systems inoperative. An operator's alternate procedures and preflight briefings must include and emphasize:

1. Use of established procedures to assess and minimize the probability of encountering windshear during takeoff/departure and approach/landing.
2. Use of established procedures (windshear escape/recovery maneuvers) to minimize the effects of unexpected windshear encounter during takeoff/departure and approach/landing.

The following is the standard proviso assigned for the windshear system for Reactive and/or predictive systems:

WIND SHEAR DETECTION, GUIDANCE AND AVOIDANCE SYSTEM

34 (NAVIGATION) or 22 (AUTO FLIGHT)	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX-X Windshear Warning and Flight Guidance System (Reactive) ***	B	-	0	(O) May be inoperative provided alternate procedures are established and used. NOTE: Operator's alternate procedures should include reviewing windshear avoidance and windshear recovery procedures.
	C	-	0	(O) May be inoperative provided: a) Alternate procedures are established and used, and b) Windshear Detection and Avoidance system (Predictive) operates normally.

34 (NAVIGATION) or 22 (AUTO FLIGHT)	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX-X Windshear Detection and Avoidance System (Predictive) ***	B	-	0	(O) May be inoperative provided alternate procedures are established and used. NOTE: Operator's alternate procedures should include reviewing windshear avoidance and windshear recovery procedures.
	C	-	0	(O) May be inoperative provided: a) Alternate procedures are established and used, and b) Windshear Warning and Guidance System (Reactive) operates normally.
INSTALLATIONS NOT REQUIRED BY CFR				
XX-X Windshear Warning and Flight Guidance System (Reactive) ***	C	-	0	(O) May be inoperative provided alternate procedures are established and used.
XX-X Windshear Detection and Avoidance System (Predictive) ***	C	-	0	(O) May be inoperative provided alternate procedures are established and used.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter (PL) 73, Revision 5

Date:	June 15, 2011
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: MMEL Relief for Emergency Medical Equipment

MMEL CODE: 25 (Equipment & Furnishings)

REFERENCE: PL-73, Revision 4, dated April 18, 2006
PL-73, Revision 3, dated September 24, 2004
PL-73, Revision 2, dated September 19, 2001
PL-73, Revision 1, dated August 15, 1997
PL-73, Original, dated March 4, 1994

PURPOSE:
To provide standardized Master Minimum Equipment List (MMEL) requirements for the deferral of approved emergency medical equipment, including Emergency Medical Kits (EMK), First Aid Kits (FAK), and Automated External Defibrillators (AED).

DISCUSSION:
Revision 5 reduces the number of cycles/flights to one cycle/flight for incomplete, missing, or inoperative EMKs, FAKs, and AEDs.

Revision 4 provided limited dispatch authority for EMKs, FAKs and/or AEDs that do not meet minimum FAA requirements.

Revision 3 provided clarifies that equipment in excess of FAR associated with Emergency Medical Equipment can be missing or inoperative.

Revision 2 expanded previous MMEL relief for FAKs to include relief for all Emergency Medical Equipment.

Revision 1 reformatted policy letter 73 with no change to policy.

Emergency Medical Equipment is required by Title 14 Code of Federal Regulations (14 CFR) which set forth the required number of EMKs, FAKs, and AEDs.

In order to support operational issues associated with the use of Emergency Medical Equipment, operators may elect to have additional equipment installed associated with CFR required equipment. Examples of associated equipment includes: additional items in the EMK, FAK or AEDs, kit seals, Sharps Container, Infection Control Kit, etc.

In response to the Aviation Medical Assistance Act of 1998, the FAA issued a final rule dated April 12, 2001, titled Emergency Medical Equipment. The final rule requires that air carrier operators carry AEDs on passenger carrying aircraft and augment current EMKs. The final rule required operators to comply by April 12, 2004.

After diversion due to an in-flight medical event, replacement and replenishment of the Emergency Medical Equipment may be hindered by factors beyond the operator's control. This situation has the potential to expose a large number of passengers to more risk at the diversion airport than there would be if the aircraft was dispatched i/a/w the MMEL.

POLICY:

This policy authorizes continued operation for a maximum of **one flight** to a location where Emergency Medical Equipment repairs or replacements can be made.

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

25 Equipment & Furnishings

25-XX	Automatic External Defibrillator (AED) and/or Associated Equipment	A	-	0	(O) May be incomplete, missing or inoperative provided: a) AED is resealed in a manner that will identify it as a unit that can not be mistaken for a fully serviceable unit, and b) Repairs or replacements are made **with-in 1 flight.**
		D	-	-	Any in excess of those required by CFR may be incomplete, missing, or inoperative**.**
	Emergency Medical Kit (EMK) and/or Associated Equipment	A	-	0	(O) May be incomplete, missing or inoperative provided: a) EMK is sealed in a manner that will identify it as a unit that can not be mistaken for a fully serviceable unit, and b) Repairs or replacements are made **within 1 flight**.
		D	-	-	Any in excess of those required by CFR may be incomplete, missing, or inoperative**.**

First Aid Kit (FAK) and/or Associated Equipment	A	-	-	(O) If more than one is required by CFR, only one of the required FAKs may be incomplete, missing or inoperative provided: a) FAK is resealed in a manner that will identify it as a unit that can not be mistaken for a fully serviceable unit, and b) Repairs or replacements are made within **1 flight.**
	D	-	-	Any in excess of those required by CFR may be incomplete, missing, or inoperative.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ Greg Kirtland for 7/18/2011

John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter (PL) 85, Revision 3

Date:	**January 1, 2012**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Lavatory Door Ashtray

MMEL CODE: 25 (EQUIPMENT & FURNISHINGS)

REFERENCE: **PL-85, Revision 2, dated February 7, 2000**
PL-85, Revision 1, dated August 15, 1997
PL-85, Revision Original, dated August 27, 1996

PURPOSE:
To establish standardized Master Minimum Equipment List (MMEL) relief for ashtrays installed on or near the entry side of each lavatory as provided by Airworthiness Directive (AD) 74-08-09 R2 and establish standard provisos for affected Minimum Equipment Lists (MEL).

DISCUSSION:
Revision 3 omits the Global Change (GC) designation for this PL. If the MMEL used by operators as an MEL, or used to create an MMEL has not been revised since 01/01/2000, operators may continue to use PL-85 Rev 2 in their MEL.

Revision 2 revises policy letter 85 to clarify that only ashtrays installed on or near the entry side of each lavatory are affected by this policy (per AD 74-08-09 R2).
Revision 1 reformatted policy letter 85 with no change to policy.

The FAA AD 74-08-09 R2 is applicable to all transport category airplanes, certificated in any category, that have one or more lavatories equipped with paper or linen waste receptacles. This amendment revises an existing AD prompted by fires occurring in lavatories which were caused by smoking materials deposited by passengers or crew. AD 74-08-09 R2 provides for the airplane to be operated for a period of 10 days with a lavatory door ashtray missing, provided that not more than one such ashtray is missing. For airplanes on which only one lavatory ashtray is installed, the airplane may be operated for a period of 3 days if the lavatory door ashtray is missing.

POLICY:

To ensure standardization in administering the provisions of AD 74-08-09 R2, the Flight Operations Policy Board has established the following provisos as appropriate, for the dispatch relief in the MMEL/MELs.

25 (EQUIPMENT & FURNISHINGS)

XX-X	Exterior Lavatory Door Ashtrays				
1)	Airplanes with more than one exterior lavatory door ashtray installed	A	-	-	One may be missing provided it is replaced within 10 calendar days.
2)	Airplanes with only one exterior lavatory door ashtray installed	A	1	0	May be missing provided it is replaced within 3 calendar days.

Each Flight Operations Evaluation Board (FOEB) Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ G Kirkland for
John S. Duncan
Manager, Air Transportation Division,

Federal Aviation Administration

MMEL Policy Letter (PL) 95, Revision 2

Date:	**January 15, 2012**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: VHF Communications MMEL Requirements

MMEL CODE: 23 (COMMUNICATIONS)

REFERENCE: **PL-95, Revision 1, dated March 20, 2002**
PL-95, Original, dated August 15, 1997
PL-17, Original, dated August 30, 1985

PURPOSE:
To establish standardized Master Minimum Equipment List (MMEL) relief for VHF communications equipment.

DISCUSSION:
Revision 2 omits the Global Change (GC) designation for this PL.

Revision 1 deletes the High Frequency (HF) relief from this PL. Policy for HF MMEL relief is currently addressed in Policy Letter 106, Titled "High Frequency MMEL Requirements."

In the past, many MMELs stated, As required by FAR, with no other qualifications for various communications Systems. However, safety can be impacted if an aircraft is dispatched with an inoperative communication system that is powered by an emergency bus and subsequent in-flight events require the flightcrew to switch to emergency power. Thus relief should not be permitted if that communications system or component is powered by an emergency bus. In addition, subordinate components such as Frequency Transfer Lights, Frequency Transfer Switches, etc. should be listed as part of the MMEL relief, if appropriate.

POLICY:

MMEL communications relief should not be permitted if the communications system or component is powered by an emergency bus, or equivalent, and is required to accomplish an emergency procedure. While there are significant differences in electrical power distribution between various airplanes, the following MMEL example is intended to provide general communications system guidance to Flight Operations Evaluation Board (FOEB) Chairmen. It should be customized, as appropriate, for each airplane type.

23 (COMMUNICATIONS)		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
23-X	Communications Systems (VHF and UHF)	D	-	-	Any in excess of those required by CFR may be inoperative provided it is not powered by the Emergency AC Bus, Emergency DC Bus, Battery Bus, Battery Direct Bus, or the DC Transfer Bus and not required for emergency procedures.
1)	VHF Communication Control Panels				
	a) Frequency Transfer Light	C	-	0	
	b) Frequency Transfer Switch	C	-	0	
	c) Frequency Selector Knob	C	-	2	
	d) Frequency Indication	C	-	2	

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter (PL) 101, Revision 2

Date:	**December 15, 2011**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Autopilot Relief

MMEL CODE: 22 (AUTOFLIGHT)

REFERENCE: PL-101, Revision 1, dated Sep 13, 2001
PL-101, Original, dated Aug 12, 1999

PURPOSE:

To establish standardized Master Minimum Equipment List (MMEL) relief for autopilot(s).

DISCUSSION:

Revision 2 omits the Global Change (GC) designation for this PL. If the MMEL used by operators as an MEL, or used to create an MMEL has not been revised since 01/01/2000, operators may continue to use PL-101 Rev 1 in their MEL.

Revision 1 provides category C relief for non transport category aircraft where operations do not require use of autopilot(s).

Autopilots have increased in importance to safe flight compared to the days when they were considered a convenience item. Flight crew training and procedures for Transport Category Aircraft now take full advantage of the benefits that autopilots can offer. An operational autopilot, particularly one capable of maintaining a constant altitude and direction, offers significant advantages in view of increased traffic, all-weather operations, and flight crew training factors. The risk of exposing the flight crew to excessive workloads and fatigue is increased while operating without certain autopilot capabilities. Although autopilot functions and their importance to safe flight vary considerably from one airplane model to the next, standardization can provide a common approach to relief. Relief granted by the MMEL and the operator's approved MEL must take into account the continued safe operation considering the next failure.

The intent of this PL is to provide, at dispatch whenever possible, at least one operating autopilot, specifically, one capable of maintaining a constant altitude and direction.

POLICY:

GENERAL POLICY CONSIDERATIONS LEADING TO SPECIFIC RELIEF

1. Flight Standards Board (FSB) members should, in consultation with the manufacturer, assess the suitability and limitations of inoperative autopilot systems and include their assessments in the FSB report. Attention should be given to requirements for flight crew training with other significant system failures where the absence of an autopilot would be disadvantageous.

2. The FOEB should consider the following in order to establish appropriate MMEL relief for autopilot systems:

a. The inherent stability of the airplane model/series.

b. Establish specific relief for specific functions or modes of the autopilot subsystems according to their utility in the event of another system failure.

c. The potential effect of other inoperative systems, specifically those that incur additional flight crew workload, such as an inoperative automatic cabin pressurization controller.

d. Specific relief policies necessary in ETOPS environments.

e. Specific relief policies necessary in certain navigation environments (e.g., RVSM, RNP-5, and RNP-10 type operations).

The principal operations inspector (POI) will ensure that the operator incorporates FSB requirements in its approved training program. The checking and training requirements developed by the FSB must be carefully reviewed to ensure the adequacy of training in failures requiring manual manipulation of aircraft flight controls.

In all cases, the final decision to accept the aircraft rest with the flight crew. The decision should be based on the specific dispatch factors such as weather, traffic density, the effects of other inoperative components, the experience level of the crew and the level of training in operations with inoperative autopilot.

SPECIFIC RELIEF POLICY

FOEB Chairman should review MMELs under their cognizance and revise them as appropriate to adhere to the following criteria:

** Flight Operations Evaluation Board (FOEB) Chairman should establish provisos (including M and/or O procedures) as appropriate for the specific aircraft considering the items listed in paragraphs 1 or 2 above.

The term "AUTOPILOT" in the following provisos refers to a system that has functions which are intended to maintain constant altitude and a constant direction, both of which are operable and operating within acceptable limits. Other autopilot functions or modes are not the subject of the following provisos but should be addressed and, if applicable, listed in separate provisos by FOEB Chairmen.

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

34 NAVIGATION		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
1)	Transport Category Aircraft with Only One Autopilot Installed	B	1	0	**
2)	Transport Category Aircraft with Two or More Autopilots Installed	C	-	1	**
		B	-	0	**
3)	Non Transport Category Aircraft	C	-	0	May be inoperative provide operations do not require its use

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ G Kirkland for
John S. Duncan
Manager, Air Transportation Division

PL-106, Revision 5, Draft 1, Scott Hofstra, UPS Airlines, shofstra@ups.com, (502) 386-4565

Federal Aviation Administration

MMEL Policy Letter (PL) 106, Revision 5, d1 GC

Date:	**xxxx xx. 2012**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply To Attn Of:	Manager, Technical Programs Branch, AFS-260

MMEL GLOBAL CHANGE (GC)

This GC is an approved addendum to all existing MMEL documents. The operator may seek use of the specific relief contained in the PL by revising the Minimum Equipment List (MEL). In doing so, the sample proviso stating the relief in the PL must be copied verbatim in the operator's MEL. Approval of the revised MEL is gained through the assigned Principal Operations Inspector (POI) utilizing the established procedure. **This GC expires 11/18/2015**.

Subject: High Frequency (HF) Communications

MMEL CODE: 23 (COMMUNICATIONS)

REFERENCE: PL-106, Revision 4, dated January 18, 2012
PL-106, Revision 3, dated October 7, 2005
PL-106, Revision 2, dated March 16, 2004
PL-106, Revision 1, dated January 18, 2001
PL-106, Original, dated October 18, 2000

PURPOSE:

To provide standards for MMEL relief for HF communication systems.

DISCUSSION:

Revision 5; removed note from column 5.

Revision 4 revised proviso (d) - clarifying statements regarding short codes (INMARSAT) or Public Switch Telephone Network (PSTN), normally referred to as commercial direct dial numbers (IRIDIUM), must be available for the intended route of flight. ATS facility has been clarified by adding FIR (Flight Information Region).

Revision 3 revised proviso (d) to clarify that coordination of INMARSAT Codes is only required when SATCOM Voice is used.

Revision 2 revises DISCUSSION and MMEL provisions to address acceptability of using SATCOM Voice as a backup when one HF is inoperative.

Revision 1 revises the subject title to clarify that more than one HF may be inoperative. The purpose statement is revised to clarify that the PL also addresses HF relief when HF is not required by Title 14 of the Code of Federal Regulations (14 CFR). The (O) procedure was deleted in the first proviso since no changes to flight crew procedures are needed. In the second proviso, the phrase "while conducting extended overwater" was deleted since the requirement for two Long Range Communication System (LRCS) can exist over land. Proviso a) was changed to delete "and ACARS" since the term "data link" includes ACARS and other sub systems on the airplane needed to communicate data. Proviso b) was revised to clarify that data link communication must be operational, not just SATCOM coverage. FAA MMEL relief is provided for HF communication systems. The current proviso states: "Any in excess of those required by FAR may be inoperative."

In 1996, the FAA recognized technological advances in communications by a rule change that included use of a new term: Long Range Communication System (LRCS). 14 CFR Section 1.1 defines LRCS as "A system that uses satellite relay, data link, high frequency, or other approved communication system which extends beyond line-of-sight." Examples of systems that meet this definition are: HF-voice, HF-data link, SATCOM-voice, and SATCOM-data link.

The regulations, therefore, now address long-range communication requirements in terms of LRCS. With that as a basis, an aircraft on extended range segments unable to utilize line-of-sight systems must have at least two operational LRCSs to honor regulatory communication requirements (unless specifically excepted under the operational rules).

At present most ATS facilities are not adequately equipped to handle SATCOM data or voice as the primary means of communication. Most however are capable and willing to accept SATCOM data or voice as a backup to normal HF communication systems. HF-voice is the only LRCS currently available for Air Traffic Control communications in many areas. Therefore, in areas requiring two operational LRCSs, at least one must be HF-voice and in areas requiring one LRCS, that system must be HF-voice.

POLICY:

With the foregoing as a basis, and in order to take advantage of the technology improvements recognized by 14 CFR, the following MMEL policy is established.

ATA 23 COMMUNICATIONS	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
23-XX High Frequency (HF) Communications System	D	-	-	Any in excess of those required by FAR may be Inoperative.
	C	-	1	(O) May be inoperative while conducting operations that require two LRCS provided: a) SATCOM Voice or Data Link operates normally, b) Alternate procedures are established and used, c) SATCOM Voice coverage is available over the intended route of flight, and d) If SATCOM Voice is to be used over the intended route of flight, SATCOM Voice short codes (INMARSAT) or direct dial commercial numbers (IRIDIUM) must be available. If not available, prior coordination with appropriate ATS (FIR) facility is required. ~~NOTE: SATCOM Voice is to be used only as a backup to normal HF communications.~~

Each FOEB Chairman should apply this PL to affected MMELs through the normal FOEB process.

/s/ G Kirkland for
John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter 121, Revision 0

Date:	September 06, 2007
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: (EFB) Electronic Flight Bag

MMEL CODE: 46 (INFORMATION SYSTEMS)

REFERENCE:

PURPOSE:
The purpose of this policy letter is to establish guidelines for Master Minimum Equipment List (MMEL) relief for Electronic Flight Bags (EFB).

DISCUSSION:

Revision Original: Provides MMEL guidance for installed Electronic Flight Bags and associated software applications. Recent industry requests have identified the need for standardizing MMEL relief for Electronic Flight Bags. There are currently numerous retrofitted EFBs available to operators. This policy letter is meant to standardize relief to incorporate retrofitted installations as well as manufacturer installed Electronic Flight Bags.

FAA Advisory Circular 120-76A contains current information and guidance relating to the definition and certification of Electronic Flight Bags and their software applications, as well as an AEG requirement to publish an FSB report for Class 2 & 3 and Type B and C software applications. The FAA N8200.98, Electronic Flight Bag Job Aid also provides guidance to the FOEB Chairmen and CHDO Managers concerning EFB information for review during the EFB MMEL/MEL approval process.

This Policy Letter is written to give the FOEB Chairmen and CHDOs guidance related to inserting relief for Electronic Flight Bags into the MMELs and individual operator's MELs.

EFB systems having Class 1 hardware are generally commercial-off-the-shelf (COTS) based computer systems used for aircraft operations, are portable, are not attached to an aircraft mounting device, are considered as Portable Electronic Devices (PEDs) such as PDAs (Personal Data Assistants), tablet PCs (portable tablet computers), laptop computers, etc., may connect to ship's power and/or obtain read-only data through a certified power/data source, and, if using only a Type A software application, are not required to go through an administrative control process for use on an aircraft.

EFB systems having Class 2 hardware are generally COTS based computer systems used for aircraft operations, are portable, are considered a PED, are required to go through an administrative control process to add, remove, or use in the aircraft, and are attached by means of a mounting device either

directly to the aircraft (albeit removable) or by use of devices such as a knee-board, cradle, docking-station, etc. These devices may connect to ship's power and/or obtain read-only data through a certified aircraft power/data source.

EFB systems having Class 3 hardware are mounted and electrically connected to the aircraft as permanently installed equipment and require Aircraft Certification Service (AIR) design approval. These devices may be connected to essential and/or critical aircraft data busses and may be used for other aircraft data communication applications.

Type A software applications are pre-composed, fixed presentations of data that are also currently presented in paper format. These software applications may consist of manuals relating to the operation of the aircraft including an operator's MEL. Additional examples of Type A software applications may be found in AC 120-76A, Appendix A.

Type B software applications include dynamic, interactive applications that can manipulate data and presentation. These applications may consist of terminal charts, electronic logbook, electronic weight & balance, aircraft performance data including calculation capability for takeoff, enroute, and landing operations, electronic checklists, air to ground data links, aeronautical weather data, etc. Additional examples of Type B software applications may be found in AC 120-76A, Appendix B.

Type C software applications may include primary flight displays, TCAS, ADSB, moving map displays, own-ship position, etc. These applications require AIR design approval unless the software is user modifiable, which may be utilized to host Type A or B applications.

The purpose of this Policy Letter is not to exclude Class 1 & 2 EFBs from the operator's MELs. If desired, relief for Class 1 & 2 EFBs may be negotiated with an operator's CHDO for inclusion as Administrative Control Items in that operator's MEL.

POLICY:

This policy letter specifically addresses relief for Class 3 EFBs and mounting devices, data connectivity, and power connections associated with Class 1, and 2 EFBs

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

46 (INFORMATION SYSTEMS)

***	Electronic Flight Bag Systems (EFBs)				
****	Class 3 EFBs	C	-	-	(O) May be inoperative provided alternate procedures are established and used. NOTE: Any function, program or document which operates normally may be used.
		D	-	0	May be inoperative provided procedures do not require its use.
****	Data Connectivity (Class 2)	C	-	-	(O) May be inoperative provided alternate procedures are established and used.

		D	-	0	May be inoperative provided procedures do not require its use.
****	Power Connection (Class 1 & 2)	C	-	-	(O) May be inoperative provided alternate procedures are established and used.
		D	-	0	May be inoperative provided procedures do not require its use.
****	Mounting Device (Class 2)	C	-	0	(M) (O)May be inoperative provided: a) Associated EFB and hardware is secured by an alternate means or removed from the aircraft, b) Alternate procedures are established and used.
		D	-	0	(M) May be inoperative provided: a) Associated EFB and hardware is secured by an alternate means or removed from the aircraft, b) Procedures do not require its use.

Each Flight Operations Evaluation Board (FOEB) Chairman should apply this Policy to affected MMELs through the normal FOEB process.

Thomas Toula, Manager,
Air Transportation Division, AFS-200

PL-121 reformatted 02/04/2010 with no change in policy.

Lead: Kevin Peters, FEDEX, 901-224-5337, knpeters@fedex.com
D1 12/1/2011, D2, D3 06/28/2012

Federal Aviation Administration

MMEL Policy Letter (PL) 122, Revision 1 GC D3

Date:	xx xx, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

MMEL GLOBAL CHANGE (GC)

This Global Change is an approved addendum to all existing MMEL documents. The operator may seek use of the specific relief contained in the policy letter by revising their Minimum Equipment List (MEL). In doing so, the sample proviso stating relief in the policy letter must be copied verbatim in the operator's MEL. Approval of the revised MEL is gained using established procedure, through the assigned Principle Operations Inspector (POI). This GC expires 6/25/2016.

SUBJECT: Flight Deck Door Surveillance Systems

MMEL CODE: 25 (Equipment and Furnishings)

REFERENCE: PL-122, Original, dated April 04, 2008.
14 CFR §§ 25.795, 121.313, 121.547, 121.583

PURPOSE:

To provide standardized Master Minimum Equipment List (MMEL) relief for Flight Deck Door Visual Surveillance Systems.

DISCUSSION:

Revision 1 revises relief for cargo aircraft operating with Intrusion Resistant Cockpit Doors (IRCD) that have view ports installed, and/or are operated with a Flight Deck Door Visual Surveillance System.

The September 11, 2001 terrorist attacks prompted the design and installation of intrusion resistant doors on the vast majority of the Transport Category Airplanes operated within the United States and many other parts of the world. The FAA and other aviation regulatory agencies examined equipment options which would enhance security in operations. Aviation regulatory agencies also reexamined crew procedures~~, specifically those crew procedures~~ associated with monitoring and controlling access to the flight deck.

On passenger carrying aircraft coordination between the flight and cabin crews must occur before the flight deck door is opened during flight. Crew coordination procedures must communicate both normal and abnormal conditions in the cabin to the flight crew. The flight crew should also perform a thorough and deliberate viewing of the area aft of the flight deck door before the door is opened.

Lead: Kevin Peters, FEDEX, 901-224-5337, knpeters@fedex.com
D1 12/1/2011, D2, D3 06/28/2012

Viewing the area aft of the flight deck door, before it is opened, may be accomplished effectively using an electronic visual surveillance system or a viewing port mounted within the flight deck door panel. Procedures for the use of electronic visual surveillance systems or viewing ports should ensure the area aft of the flight deck door is secure and cabin crews requesting entry are not doing so under duress.

The International Civil Aviation Organization (ICAO) has also called for increased in-flight security standards by issuing Amendment 27 to ICAO Annex 6, Part 1, International Commercial Air Transport – Aeroplanes, Operation of Aircraft. Other regulatory agencies have agreed that operational procedures must be in place to ensure that flight deck access is coordinated with the flight crew before the flight deck door is opened.

All-cargo operated aircraft are specifically exempt by regulation (14 CFR §§ 25.795 and 121.313) from requiring lockable flight deck door. Some however, have been certified with Intrusion Resistant Cockpit Doors (IRCD) that has locks and view ports installed. Similarly, some passenger configured aircraft may be modified to the freighter configuration that includes an IRCD and systems such as video surveillance. In these cases the IRCD and other related systems do not need to be removed or replaced.

If a cargo aircraft has an operable IRCD, then the aircraft aft of the door is considered crew rest, courier, or supernumerary compartments that can be occupied in flight by persons per § 121.583. If the door is not an IRCD, or is an IRCD but is inoperative, the entire aircraft is considered a flight deck and only those authorized by § 121.547 may be aboard.

POLICY:

On passenger carrying aircraft, POIs may approve relief for Flight Deck Door Visual Surveillance Systems in operator MELs provided (O) Procedures developed by the operator are adequate to ensure flight deck security when the flight deck door is opened during flight.

On cargo aircraft with an operable IRCD, the aircraft aft of the door is considered crew rest, courier, or supernumerary compartments that can be occupied in flight by persons per § 121.583. If the door is not an IRCD, or is an IRCD but is inoperative, the entire aircraft is considered a flight deck and only those authorized by § 121.547 may be aboard.

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

Flight Deck Door Visual Surveillance Systems	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
1) Electric System ***	A	1	0	(O) May be inoperative provided: a) Alternate procedures are established and used, and b) Repairs are made within three flight days.
	C	1	0	(O) May be inoperative provided: a) A flight deck door viewing port is installed and operates normally, and b) Alternate procedures are established and used.
	D	1	0	May be inoperative provided procedures do not require its use.

	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
a) Cargo Configuration	C	1	0	May be inoperative provided the aircraft aft of the flight deck door is occupied by authorized flight crews only.
	D	1	0	May be inoperative provided procedures do not require its use.
2) Viewing Ports ***	A	1	0	(O) May be inoperative provided: a) Alternate procedures are established and used, and b) Repairs are made within three flight days.
	C	1	0	(O) May be inoperative provided: a) An electronic flight deck door visual surveillance system is installed and operates normally, and b) Alternate procedures are established and used.
	D	1	0	May be inoperative provided procedures do not require its use.
a) Cargo Configuration	C	1	0	May be inoperative provided the aircraft aft of the flight deck door is occupied by authorized flight crews only.
	D	1	0	May be inoperative provided procedures do not require its use.

Each Flight Operations Evaluation Board (FOEB) Chairperson should apply this Policy to affected MMELs through the normal FOEB process.

Leslie Smith
Manager, Air Transportation Division

PL 125, Revision 1 Draft 2
Lead – Bob Taylor, US Airways
412-474-4355 Robert.Taylor2@usairways.com

Federal Aviation Administration

MMEL Policy Letter 125, Revision 1

Date:	**XX / XX / XX**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Equipment Relief without Passengers

MMEL CODE: 00 (GENERAL)

REFERENCE:

PURPOSE:
The purpose of this Policy Letter is to allow items that are normally required for passenger carrying operations to be inoperative provided no passengers are carried.

DISCUSSION:
Certain 14 CFRs require specific equipment to be onboard airplanes for passenger carrying operations. Providing MMEL relief for these items allows operators the ability to position the airplane to another location and still carry cargo, crew members and other authorized persons.
14 CFR Section 121.583 states that when authorized by the certificate holder, certain persons may be carried aboard an airplane without complying with the passenger-carrying airplane requirements in Sections 121.309(f), 121.310, 121.391, 121.571, and 121.587; the passenger-carrying operation requirements in Sections 121.157(c) and 121.291; and the requirements pertaining to passengers in Sections 121.285, 121.313(f), 121.317, 121.547, and 121.573. 14 CFR Section 121.583 further states the persons authorized to be carried and the requirements for allowing the authorized persons to be carried.

It has been determined that an acceptable level of safety is maintained by this policy since it is allowed by 14 CFR Sections 121.583, 125.331 and 135.85.

POLICY:
Operator's alternate procedures must provide for the safe carriage of authorized persons and include a safety briefing on smoking, seat belts, emergency exits, oxygen, and if applicable, flotation equipment for EOW operations.

1)	Megaphones	C	-	0	(O) May be missing or inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.
2)	Door Slides	C	-	1	(M)(O) May be missing or inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, c) Alternate procedures are established and used, d) Each person has unobstructed access from their seat to an operative regular or emergency exit, e) Inoperative exits are conspicuously identified as inoperative, f) Any Emergency exit sign and floor proximity lights associated only with the inoperative exits are covered to obscure the sign and lights, and g) Safety briefing includes the location of the inoperative exit(s) and instructions not to use the inoperative exit(s).
3)	Interior Emergency Lighting	C	-	0	(O) May be inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.
4)	Exterior Emergency Lighting	C	-	0	(O) May be inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.
5)	Escape Path Markings	C	-	0	(O) May be inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.

6)	Exit Markings	C	-	0	(O) May be inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.
7)	Flash Lights	C	-	0	(O) May be missing or inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.
8)	Flight Attendant Seats	C	-	0	(O) May be inoperative provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, c) Alternate procedures are established and used, and d) Inoperative Seat/Seat position is not occupied.
9)	Printed Supplemental Safety Information	C	-	0	(O) May be missing provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used.

The Flight Operations Evaluation Board (FOEB) Chairman should incorporate this policy through the normal FOEB MMEL revision process.

John Duncan, Manager,
Air Transportation Division, AFS-200

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
17 Jan 12	P Nordstrom		First statement after "Revision 18:" should be deleted. Statement is not used on other CG PLs and it is not needed since the GC PL provides the applicability of GCs		Agreed. Sentence removed
			Revision 18 highlights have incorrect definition numbers in statement, "Also adds the following definitions: Air Transport Association (ATA) System Page (#3), operative, (#23), and takeoff (#26)". Numbers should be 22 and 25.		Corrected
			Definition 1 typo in last sentence, "The accessible lavatory requirement applies to aircraft with more than one (1) isle." Should be "aisle		Corrected
			Definition 3A should also have statement: "Repair interval categories (A, B, C and D are listed on the right side of this column."		Changed title to Repair Category to reflect actual language on MMEL template. Added sub-item B. Repair Category that states to refer to definition #24.
			Definition 3E title, "Lower Case Letter in Remarks or Exceptions" does not seem to be a definition and sometimes numbers are used for conditions and limitations. Suggest definition be: "Provisos. Are indicated by lower case letter or a number in the Remarks or Exceptions column. Provisos are conditions or limitations that must be complied with for operation with the listed instrument or equipment item inoperative."		Reserve comment for post AFS-260 consultation. Concur with comment. Changes made. GJ
			Definition 3G Vertical Bar last sentence, "The change bar is dropped at the next revision of that page." is not correct. As stated in PL-31 specification 3, "All change bars applicable to the previous revision of the MMEL are to be removed prior to release of the next revision. This applies to all pages, including those not affected by the new revision."		This is being changed in 8900.10. The change bar may be dropped at the next number revision.
			Definition 12 Deleted is missing a period at end of sentence.		Corrected
			Definition 22 Operative, add sentence that "operative", "must be operative", "must be fully operative", "operates normally", and "considered operative" can be used interchangeably		Definition 22 has been re-written. Please review the drafted language and re-asses the comment.

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
			Definition 28 Visual Flight Rules (VFR) states, "VFR is as defined in FAR Part 91." Shouldn't this be "VFR is as defined in 14 CFR Part 91."		Corrected
			Definition 32 Electronic Fault Alerting System – General "-General" can be deleted.		Agreed
			Appendix B definition 1 has typo "isle". Should be "aisle".		Corrected
			Appendix B definition 3E – see comment 5).		Definition added
			Appendix B definition 3G – Why has this changed from previous policy. Operators should be able to use a revision system that is approved by their regulators and not just the MMEL method. Modern publishing formats may provide a much better system for tracking revisions, especially when using EFBs with XML formatted MELs.		This is being changed in 8900.10. The change bar may be dropped at the next number revision.
			Appendix B definition 13 ER? Definition 14 is "Extended Range Operations (ER)".		Corrected
			There should probably be a statement somewhere that Appendix B is not required to be in an operator's MEL		Agreed. The following note has been added to the document: **NOTE: This appendix is NOT required to be in an operators MEL**
01/31/12	S. Hofstra UPS		**G. Notes:** Can we change the last sentence to read; *"Notes may be added to Remarks or Exceptions column but are not part of the provisos."*? We've had concerns from our CMO over our ability to place notes in this column.		Language added to both the PL and the draft 8900.1 v4c4s3: **Additional notes may be added to the MEL by the aircraft operator, as appropriate.**
			20. Is Not Used Typo; the word "be" between "Not" and "necessary" needs to be removed in the third sentence.		concur
			A. Repair Category A. Can we add the words "or Exceptions" after the word "Remarks" as this is how the MMEL is worded?		concur

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
			A. Repair Category A. Can we add the words "or Exceptions" after the word "Remarks" as this is how the MMEL is worded?		concur
			D. Repair Category D. Can we delete the (2880 hours) as it isn't used as a standard reference for A, B or C relief and may confuse an operator into believing that they have an hour limit instead of the calendar day limit?		No.
			26. Triple Asterisk (***). Typo in sentence two. Need to add "certificate h" before "olders/program manager/operator's aircraft."		Concur
02/02/12	J.P. Dargis		**3 (H) VERTICAL Bar (change bar)** **PL-31 Spec3 will need to be revised to harmonize with this definition.**		agreed
			21. NEF **The last sentence is redundant. It's already addressed in the first sentence of the definition.** { They do not include instrument and equipment items that are functionally required to meet the certification rule or for compliance with any operational rule}.		agreed
			24. Repair Category B **Should add "Day of Discovery" in the following text "**day the malfunction was recorded".		No, this is addressed under the Day of Discovery definition
			24. Repair Category C **Should add "Day of Discovery" in the following text "**day the malfunction was recorded".		No, this is addressed under the Day of Discovery definition
			24. Repair Category D **Should add "Day of Discovery" in the following text "**day the malfunction was recorded".		No, this is addressed under the Day of Discovery definition
			Appendix B item 22 OPERATIVE **We should add that the selected terminology be used throughout the MEL.**		Implied.
02/13/12	Bob Taylor US Airways		The 3rd sentence in the paragraph under POLICY lists specific reasons why MEL definitions will be tailored, as appropriate. This sentence eliminates "format issues" which was previously included		Added: MEL definitions (including format issues) will be tailored,

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
			under the DISCUSSION section in PL 70. Add "format issues" to the 3rd sentence in the POLICY paragraph of PL 25.		
02/13/12	Bob Taylor US Airways		The 2nd sentence of the "Note" under POLICY states "Appendix B is not to be included in the operator's MEL" while the Note in Appendix B itself states "This appendix is NOT required to be in an operators MEL." Align both Notes by adding the word "required" to the 2nd sentence in the "Note" under POLICY.		Concur GJ
02/13/12	Bob Taylor US Airways		1. Accessible Lavatory Items – The 2nd sentence states "The lavatory shall provide **accessible door locks, call buttons,** grab bars…" while the referenced CFR 382.63 states "The lavatory shall provide **door locks, accessible call buttons**, grab bars…". Align use of the word "accessible" with CFR 382.63.		Agreed. Changed sentence to read, "The lavatory shall provide accessible door locks, call buttons, grab bars, faucets, other controls, and dispensers. 14 CFR § 382.71 requires accessible features to be maintained in proper working order
02/13/12	Bob Taylor US Airways		1. Accessible Lavatory Items – The 3rd sentence states "14 CFR § 382.71 requires accessible features **to be in** proper working order…" while CFR 382.71 states "As a carrier you must **maintain** all aircraft accessibility features in proper working order." Align the 3rd sentence with the referenced CFR by changing it to read "14 CFR § 382.71 **requires a carrier to maintain** accessible features in proper working order…"		Concur GJ
			1. Accessible Lavatory Items – The parenthetical portion of the 3rd sentence states "(§ 382.41 requirements include an onboard wheelchair and certain armrests to be movable)." If the intent here is to identify the CFRs which **require aircraft to be equipped** with these items change the CFR references **to 382.61 (armrests) and 382.65 (onboard wheelchair)**; 382.41 only defines the requirement for carriers to provide information regarding these items to qualified individuals.		Concur. Reference and information removed. GJ
			1. Accessible Lavatory Items – The 4th sentence states "The accessible lavatory requirement applies to aircraft with more than one (1) aisle. Add "as defined by CFR 382.63" to the end of the		Concur GJ

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
			sentence to ensure the definition is not prematurely required to be applied to carriers with existing aircraft with more than one aisle and without an accessible lavatory, as is provided for in CFR 382.63 (c).		
			3.D. Number Required for Dispatch – Change "…provided the conditions specified in column 4 are met" to provided the conditions specified in the Remarks or Exceptions column are met"; this aligns definition 3.D. with the other draft definitions by eliminating references to specific column numbers.		Concur. GJ
			3.D. Number Required for Dispatch – This definition previously contained the Note "Where the MMEL shows a variable number required for dispatch, the MEL must reflect the actual number required for dispatch or an alternate means of configuration control approved by the Administrator." Has this information been relocated? If not, replace the Note.		Nonconcur. The previous language was taken from PL-70 upon initial merge of the two PLs. That information was deemed excessive for this PL and included in the 8900 v4c4 rewrite. GJ
			7. Considered Inoperative – The previous definition referenced "item" (singular) four times; the revised definition replaced "item" with "items" (plural) once, leaving three references to "item" (singular). Change new text "instrument and equipment **items**" to "instrument and equipment **item**".		Concur. GJ
02/13/12	Bob Taylor US Airways		24. Repair Category – The proposed definition deletes "For time intervals specified in calendar days or flight days, the day the malfunction was recorded in the maintenance record/logbook is excluded" from A. Repair Categroy A (I assume because it is addressed in new def. 10 Day of Discovery), but it does not delete the same information from Repair Category B, C, or D. Recommend aligning all four Repair Category definitions by reinstating deleted text in Repair Category A.		Nonconcur. Repair category B, C, and D apply to days only; category A may apply to days, hours, cycles, ect., and thus, does not explicitly apply. GJ
			Appendix B - 1. Accessible Lavatory Items		Nonconcur with recommendation to add regulatory language. Added "Refer to § 382.63(c)." GJ

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
			Change Note from "Required in the MEL of aircraft with more than one (1) aisle" to Required in the MEL of aircraft with more than one (1) aisle when equipped with an accessible lavatory" in consideration of CFR 382.63(c).		
			Appendix B - 3.F. is identified as "Lower Case letters in Remarks or Exceptions"; the actual title of definition 3.F. is "Provisos". Change App. B to reflect actual title; change Requirement column to "Required".		Concur GJ
02/13/12	Bob Taylor US Airways		Appendix B - 3.A., B., C., D., E., F., and G. - PL 70 clearly identifies these definitions as editable by the operator due to MEL format; propose adding current PL 70 language "Operator must include explanation describing format" to the Notes column.		Nonconcur. The information in PL-70 is not necessarily correct. Definitions cannot be changed as you indicate, only the MEL format.
			Appendix B - 3.B. Repair Category – change "used" to "use."		Concur GJ
			Appendix B - 3.H. Vertical Bar (change bar). - Not all operators use a bar to identify changes. Add current PL 70 language to the Notes column indicating "Operator must indicate the revision identification method; may be a bar or other suitable method."		Nonconcur. Definition does not indicate a requirement to use a change bar. GJ
			Appendix B - 12. Deleted – In addition to the definition being identified as Optional, add current PL 70 language "Operator format issue" to the Notes column which will enable those who do not use columns in their MEL to edit the reference to "column" out of the definition.		Nonconcur. PL-70 does not define what "operator format issue" means. Definitions may not be altered in the MEL to suit individual Aircraft operators. GJ
			Appendix B - 15. Flight Day – Add current PL 70 language "Operator may edit to define when clock time starts and ends" to the Notes column.		Nonconcur. Definition reflects operator flexibility. GJ
			Appendix B – 24. Repair Intervals – Current PL 70 identifies this as a format issue; add current PL 70 language " Definition may be edited to conform to MEL format. Limitations cannot be changed and examples need not be included" to the Notes column.		Nonconcur. Definitions may not be edited to suit the operator, only the format. GJ

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		
02/13/12	Bob Taylor US Airways		Appendix B - 30 (M) – Some MELs use an alternative to the (M) symbol [e.g. the words "Maintenance Procedure" in place of (M)]. Add language to the Notes column indicating the title of the definition may be edited to that which the operator uses in place of the (M) symbol.		Nonconcur. Nothing says (M) symbols must be used, only that they indicate a maintenance procedure. The flexibility to spell it out is already there with concurrence of the POI. GJ
			Appendix B - 31 (O) – Some MELs use an alternative to the (O) symbol [e.g. the words "Operations Procedure" in place of (O)]. Add language to the Notes column indicating the title of the definition may be edited to that which the operator uses in place of the (O) symbol.		Nonconcur. Nothing says (O) symbols must be used, only that they indicate a maintenance procedure. The flexibility to spell it out is already there with concurrence of the POI. GJ
02/15/2012	T Atzert UAL		Def #1 should be deleted until all 14CFR 382 issues are resolved. There are many open/unresolved issues raised by MMEL IG members Def #2: The following statement was added at R17: **As an example, ACI may be used to track ETOPS accomplishment of required APU cold-soak, or in-flight verification starts.** This statement should be reinserted as there was as specific reason for its addition at R17. Def #3C: Since passenger cabin items are NEF items, suggest: Should the number be a variable (e.g., fleet configuration differences, cockpit lighting items, cabin lighting items, cargo restraint components) a number is not required and the "-" symbol is used. Def #3D: Add the following: "-" symbol may be used for fleet configuration differences, cockpit lighting items, cabin lighting items, cargo restraint components. For these cases the dispatch requirements will be specified in the Remarks or		Nonconcur. The 382 accessible lavatory is a current requirement. There definition is correct. GJ Concur. The definition reflects what is currently in 8900.1 v4c4s1 and should have kept the example as indicated. The example is added back-in the definition. GJ Concur. Recommendation incorporated. GJ Concur with the information but not with where it should be added. This is information in excess of the basic definition and should be located in the 8900.1 order. I've added this to the 8900.1 rewrite, specifically section 3. GJ

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

			Exceptions column.		
			Def #3H: This should be aligned with PL-31, which says rev bars for the entire MMEL are deleted at each revision.		Cncur. The language reflects what is currently in 8900.1 v4c4s1. However, this definition is removed from the 8900.1 rewrite. Aligning the definitions between PL-25 and 31 is appropriate. GJ
			Def #8: This is not a definition, but a policy requirement. Suggest: A certificate holder/program manager/operator who has the authorization to use an FAA-approved MEL also has the authority to use a continuing authorization to approve an extension to the maximum repair interval for category B or C items (3 days and 10 days, respectively) in accordance with the appropriate Operations Specification and applicable FAA Guidance. A certificate holder/program manager/operator is not authorized to extend the maximum repair time for category A and D items, as specified in the approved MEL.		Concur. This was taken from 8900.1 v4c4s1. Although it correctly reflects policy, you are correct in assessing it is not a definition. Your recommended language is added with minor changes. GJ
			Def #9: Suggest: Indicates that a variable number (quantity) of the instrument and equipment items may be installed or required for dispatch. This is common when a fleet MEL is used since aircraft of the same make and model may have differing numbers of specific instrument and/or equipment items installed.		Concur. Incorporated recommendation. GJ
			Def #24/A: What about Part 91? Some Part 91 text was deleted and should be reinserted.		Concur. Once again, the the language reflects what is currently in 8900.1 v4c4s1. Adding back the part 91 info is appropriate. GJ
			Def #32: This is out of alphabetical order.		Concur, however, ease of use with respect to finding definitions dictates that this definition and its' two pages of accompanying information be added as the last definition. GJ
			Appendix B #1: Delete until 14CFR382 issues are resolved (ref comment above for Def #1).		Nonconcur. GJ
			Appendix B #24: Should not be required for Part		

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

			91.		Concur. Updated. GJ
1 Mar 2012	Paul Nordstrom	Boeing	1. Appendix B: Definition 3F needs to be updated to match the revised PL definition 3F. “Provisos”. 2. Definition 5 needs to be updated to match the revised PL definition 5. “As Required by FAR”. 3. Definition 6 needs to be updated to match the revised PL definition 6. “Code of Federal Regulations (CFR) and Federal Aviation Regulations (FAR)”.		1. Concur. Updated. GJ 2. Concur. Updated. GJ 3. Concur. Updated. GJ
04/23/2012	Darrel Sheets	NetJets	I propose to relocate the second note from definition 5 to the Policy section. The note deals with Apdx A, and is more closely related to guidance than it is to definition.		Concur. Note moved. GJ
			Commencing with definition 3C, and then continuing throughout the document, I propose that “instruments and equipment” be changed to “instruments or equipment”. An instrument clearly is equipment also, but equipment is often not an instrument. Also, we are not consistent in this usage: sometimes it is ‘or’; other times it is ‘and’ or even ‘and/or’. Use of ‘or’ will capture all of it.		Nonconcur. Primary language used in §§ 91.213, 121.628, 125.201, 129.14, and 135.179 is both “or” and “and”. GJ
			In definition 3G, I propose to add “Notes may be amended or deleted, or…” in front of “Additional notes may be added….” Some notes, as written, simply are not appropriate to a given aircraft operator.		Concur. GJ
			In definition 5, I propose two changes (in addition to relocation of the second note to Policy): First, add “or similar phrase” following “As required by 14 CFR.” A scan of 13 MMELs governing NetJets aircraft indicates at least 8 variations on this phrase. Second, remove ‘Note’ and assign the remaining content as a separate paragraph within definition 5, aligned with the left margin. This then preserves use of ‘note’ within the overall list of definitions to the purpose described in definition 3G. I would also add “Use of either reference is acceptable.” to clarify interchangeability of 14 CFR and FAR.		1. Nonconcur. Adding the recommended phrase make the variations you’ve indicated legitimate. Standard phraseology must be used. GJ 2. Concur. Either phrase may be and is used in current MMELs. Adding the phrase to the definition is appropriate. GJ
			In definition 20, I propose to delete “relieved” in the second line. “Relieved” connotes “deferred” so, in		Concur. GJ

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

			effect, we are saying that another deferred item is not used. In fact, that other item has not been deferred; it is still operative, but it may not be used during the deferral period of the item immediately under consideration.		
			In definition 24D, I propose that "record/logbook" replace "log and/or record." Doing so will be consistent with other usage throughout the document.		Concur. GJ
5/10/12	S. Hofstra, UPS		Are we going to change the term ETOPS to match the new ICAO definition? ICAO Has changed the term ETOPS to EDTO. Definition per ICAO Annex 6 Fuel: ETOPS (Extended Twin Operations) is eliminated. It is replaced with EDTO (Extended Diversion Time Operations) which applies to all aircraft, not just twins.		Comment is a question, the answer of which would not require a change to the current draft under review. I recommend you review § 1.1, specifically the definition of "Extended Operations" or "ETOPS" to find your answer.
5/15/12	Paul Nordstrom	Boeing	PL-025 r18 d9 comments: Definition 3 Air Transport Association (ATA) System Page: Since the ATA has changed their name to Airlines for America (A4A), does this title need to be revised? ATA is also in Appendix B. --- Definition 8 uses "single" more times than needed. The point is made as with other definitions by stating the requirement once without repeating words. Definition 8 title should only be "Continuing Authorization" to align with OpSpec D095 and allow the definition words to state the requirements. OpSpec D095 authorizes the use of a MEL, which includes the authorization under the MEL management program for repair category extensions. Repair categories B and C are defined in Definition 24 and repeating the number of days isn't needed and detracts from the definition requirements. The categories are "repair" categories and should use		

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

			both words. Propose Definition 8 if only one extension is going to be allowed: Continuing Authorization. An aircraft operator who has the authorization to use an FAA approved MEL in accordance with Operations Specification D095 may also have the authority to use a continuing authorization to approve a single (one time) extension to the maximum repair interval for repair category B or C items. Extensions are not authorized for repair category A and D items. Based on discussion at the MMEL IG meetings it is not clear what changes will be made to OpSpec D095. If operators can get an additional extension when authorized by the FSDO, then "single" should not be in the Definition 8. Repair category C items are certainly extendable beyond the arbitrary 10 days. Experience has shown that operators have faced unanticipated part shortages and to ground an airplane when this situation occurs is not justified by safety concerns. Even ADs have allowed extensions when faced with part shortages or disruptions to the supply chains. Propose Definition 8 if additional extension will be allowed: Continuing Authorization. An aircraft operator who has the authorization to use an FAA approved MEL in accordance with Operations Specification D095 may also have the authority to use a continuing authorization to approve an extension to the maximum repair interval for repair category B or C items. Extensions are not authorized for repair category A and D items. ---------- Definition 9.Dash (-): Statement "This is common when a fleet MEL is used since aircraft of the same make and model may have differing		

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

			numbers of specific instrument and/or equipment items installed" should be deleted. The reason for the dash is not needed and the dash is also used in the MMEL. ---------- Definition 12 Deleted: Definition states "... after a sequence item" ..., which has been there for a long time, but since all of the definitions are being reworded recommend this be deleted as it does not apply to this requirement. There are two ways for an item to be deleted and Definition 12 only discusses for when Deleted is in the remarks column. The other way is when Deleted is in the Item column, which is not discussed in this definition. ---------- Definition 24 Repair Category: Not sure statement "Part 91 MEL users (D095/D195 LOAs) ..." applicability is not clear. D095 is used for other operations? Maybe "MELs authorized by Part 91.213 ..." or "Part 91 MEL users (non 91K, 121, 125, 129, 135 and 142 users) or "14 CFR 91 aircraft operators ..." is more appropriate? Note that Appendix B Notes state "14 CFR Part 91 aircraft operators are not required to use Repair Categories".		

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-25	AFS 260	5/15/2012

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-59 R4	AFS 240, Greg Janosik	3/14/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		Lead Response
9/30/11	D Sheets		In #6 of the proposed policy statement, unless "POI" has a dual meaning, "Primary" should be changed to read "Principal." In #9a of the proposed policy statement, "…all MMELs of..." seems a bit awkward. If the GC feature applies to a given aircraft series, it would seem that there is only one MMEL that is applicable to that series. The phrase "…all MMELs…" would be appropriate if the GC applied to all aircraft types; otherwise, "…the MMEL of all (xxx) series aircraft." may work better. For the GC header box, please see comment above for #9a; and "Principle" should read "Principal."		Concur. Corrected. 10/12/2011 Concur. Corrected. 10/12/2011 Concur. Corrected. 10/12/2011
10/5/11	P Nordstrom		Suggest moving some of the draft Policy statements to the Discussion. Statements 1, 2, 3, 4, 7, 10 and the last unnumbered statement may be more appropriate for the Discussion. Statement 5 may need clarification added that if the MMEL is revised before the GC expiration date, the MMEL is to be used for the MEL, not the GC.		Concur. Made changes as recommended. 10/12/2011 Concur. Comment incorporated. 10/12/2011.

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-59 R4	AFS 240, Greg Janosik	3/14/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		Lead Response
			The proposed policy to specify the aircraft type or operation may need clarification. Maybe stating, "When GC is not applicable to all MMELs, the GC will specify the applicable aircraft model or type of operation." The example should probably use "737" since all of the various 737 models (-100/-200/...BBJ) are all in one MMEL. Statement 9b, suggest deleting the parentheses for "(or by using the equivalent terminology)". Operators should use the right terminology for their model airplane and their MEL standard wording when appropriate. Use of the parentheses indicates that this may not be allowed or preferred.		Concur. Comment incorporated. 10/12/2011. Concur. Made change as recommended. 10/12/2011. Concur. Made change as recommended. 10/12/2011.
11/14/2011	Kevin Peters, FEDEX		I believe there should two different types of GC headers, one that is used when AEG chairman wants operators to apply sample MMEL proviso strictly verbatim and the other when AEG is OK with operator using 'equivalent terminology' as not all PL sample MMEL provisos fit every configuration, etc. I suggest that PL 59 Policy section 4.b be rewritten as		Concur. Changes made as recommended. 11/16/2011 R4 D6

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-59 R4	AFS 240, Greg Janosik	3/14/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		Lead Response
			follows: Requirement(s) on how to apply the sample proviso(s) of the GC to the operator's MEL. For example: "Each applicable sample proviso stating the relief in the PL must be copied verbatim in the operator's MEL." - or - "Each applicable sample proviso stating the relief in the PL must be copied verbatim or by using the equivalent terminology in the operator's MEL." My argument for this is as follows: I believe current draft does not clearly outline that AEG chairman should occasionally assign the alternate GC header of allowing using equivalent terminology. A perfect example of where is alternate GC header needs to be applied is PL 100 that currently only states 'verbatim.' PL 100 proviso a) "Acceptable cargo loading limits from an approved source, i.e., an Approved Cargo Loading Manual, or Weight and Balance Document are observed" does not lend itself to being published 'verbatim.' Operators should be able to tailor this		

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-59 R4	AFS 240, Greg Janosik	3/14/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		Lead Response
			proviso to fit their aircraft's approved source of data. PL100 needs to be re-published with alternate GC header that includes 'or using equivalent terminology.'		
11/14/2011	Kevin Peters, FEDEX		In the example of a MMEL GLOBAL CHANGE header located after Policy step 4.d would it not be better take out the "737" and list in parenthetical brackets the word "*specify*"		Concur. Changes made as recommended. 11/16/2011 R4 D6
3/14/2012	Greg Janosik		My error caused R4 D6 to not be published in a timely manner. In the mean time, comments received from Darrel Sheets, Netjets, required changes to R4 D6, and thus another review period. R4 D7 is posted with those changes for review.		No response required. GJ

Lead: Greg Janosik, AFS-240, 202-493-4830, gregory.janosik@faa.gov
D1 3/12/2012 POC: Darrel W. Sheets, NetJets, 614-239-4893, dsheets@netjets.com

Federal Aviation Administration

MMEL Policy Letter (PL) 59, Revision 4 D7

Date: March 14, 2012

To: All Region Flight Standards Division Managers
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply to Attn of: Manager, Technical Programs Branch, AFS-260

SUBJECT: Global Change (GC) Revisions

MMEL CODE: 00 (GENERAL)

REFERENCE: PL-59, Revision 3, dated June 20, 2008
PL-59, Revision 2, dated Apr, 03, 2003
PL-59, Revision 1, dated Aug 15, 1997
FAA Order 8900.10, MEL Approval Process

PURPOSE: To allow operators to obtain timely MEL relief for installed items referenced in approved PLs prior to the release of a revised MMEL.

DISCUSSION:

Revision 4: Revises language to allow for the appropriate entry of information into the aircraft operator's MEL which correctly reflects the conditions, limitations, and procedures required for the aircraft to which it applies. Omits GC tracking and numbering. Changes GC header text requirement. Adds an expiration date to the GC. Adds language for aircraft operators to incorporate a GC into their MEL if it applies to their aircraft and was not incorporated into an MMEL revision through the normal FOEB process. Outlines GC extensions

Revision 3: Adjusted the definition of a GC to modify its applicability to all or a significant number of MMELs, and specified that MGC/GC's may be time sensitive. If specified in the GC, operators are allowed to use equivalent language in their MEL. PLs and those designated as GC can be found on the opspecs.com website. For time sensitive PLs, the GC designation may be removed after sufficient time has passed.

Revision 2: Incorporated guidance language from FAA Order 8400.10 regarding application of MMEL proviso language into an operators MEL.

Revision 1: Standardized PL formatting without changing existing policy.

A GC is newly developed or changed MMEL relief which may or may not be time sensitive. The sole purpose of a GC is to allow aircraft operators to obtain timely MEL relief for installed items referenced in approved PLs prior to the release of a revised MMEL. They are applicable to all or a large segment of MMELs and will specify applicability (inclusion or exclusion) when not applicable to all aircraft type MMELs.

> **Note:** When a GC is not applicable to all MMELs, the GC will specify the applicable aircraft model or type of operation.

GCs should not occur in any great number or regularity and its application and use should be limited.

Items that qualify as a GC are generally:

a. Those items of equipment required to be installed by a new regulatory requirement; or

b. MMEL items that are affected by FAA Headquarters policy decisions.

Note: Examples are: TCAS, GPWS, CVR, Boom Microphones, etc., which are regulatory requirements, or Observer Seats, Door Slides, Cockpit Instrument Lighting, HF Communications, etc., which reflect FAA Headquarters policy decisions.

This PL information will be incorporated into the next revision of FAA Order 8900.1, volume 4, chapter 4, and then archived as appropriate.

POLICY:

1. GCs are identified by the letters "GC" after the policy letter revision number on the title page (i.e., MMEL Policy Letter (PL) 59, R4 GC).

2. GCs will contain a GC header box on the front page specifying:

a. Aircraft types and/or type aircraft operator for which the GC applies. For example: "This is an approved addendum to the MMEL of all 737 aircraft".

b. Requirement(s) on how to apply the sample proviso(s) of the GC to the aircraft operator's MEL. For example: "Each applicable sample proviso stating the relief in the PL must be copied verbatim in the aircraft operator's MEL" or, "Each applicable sample proviso stating the relief in the PL must be copied verbatim or by using the equivalent terminology in the aircraft operator's MEL".

c. Any additional requirement that may apply to the GC which requires POI and aircraft operator attention.

d. The GC expiration date.

Note: The following is an example of a GC header box:

MMEL GLOBAL CHANGE (GC)

This is an approved addendum to the MMEL of all "*specify*" aircraft. The aircraft operator may seek use of the specific relief contained in the PL by revising the Minimum Equipment List (MEL). In doing so, the applicable sample proviso stating the relief in this PL must be copied verbatim in the aircraft operator's MEL. Approval of the MEL is gained utilizing established procedures, through the assigned Principal Operations Inspector (POI). This GC expires 09/13/2015.

---

3. GCs are not designed to replace the normal FOEB revision process.

a. The release of an MMEL through the normal "standard revision" process will include all PLs released up to that date.

b. A comment in the "Highlights of Change" section for the MMEL document will state which PLs and revision, if applicable, have been incorporated in that MMEL revision.

c. The allowable relief stated in the associated PL will be in the form of a proviso that are appropriately entered into the aircraft operator's MEL to correctly reflect the conditions, limitations, and procedures required for the aircraft to which it applies.

4. The POI has the authority to approve the aircraft operator's MEL revision on the basis that the GC is an approved addendum to the existing MMEL.

5. GCs will expire 48 months (4 years) after the approval date. The expiration date will be found in the GC header box of the PL.

6. GCs may be extended by FAA Headquarters initiative or upon request by FOEB Chairmen. AFS-200 is the approving authority for all extension requests.

7. When the MMEL is revised before the GC expiration date, the MMEL is to be used for the MEL, not the GC.

Lead: Greg Janosik, AFS-240, 202-493-4830, gregory.janosik@faa.gov
D1 3/12/2012 POC: Darrel W. Sheets, NetJets, 614-239-4893, dsheets@netjets.com

8. Circumstances may warrant incorporation of a GC into an MEL following the MMEL revision or when the GC has expired.

a. POIs will consider operator requests for approval to incorporate a GC into their MEL if:

1) The GC remains active but was omitted or not fully incorporated into an MMEL revision through the normal FOEB process; or

2) The GC has expired without incorporation into an MMEL revision through the normal FOEB process; and

3) The GC is applicable to the operator's aircraft.

b. POIs will coordinate with the appropriate FOEB Chairman.

c. FOEB Chairmen are the approving authority for these requests.

John S. Duncan
Manager, Air Transportation Division

Lead: Greg Janosik, AFS-240, 202-493-4830, gregory.janosik@faa.gov
D1 3/12/2012 POC: Darrel W. Sheets, NetJets, 614-239-4893, dsheets@netjets.com

8. Circumstances may warrant incorporation of ~~an expired~~ GC into an MEL following the MMEL revision or when the GC has expired.

a. POIs will consider operator requests for approval to incorporate ~~an expired~~ GC into their MEL if:

1) The GC remains active but was omitted or not fully incorporated into an MMEL revision through the normal FOEB process; or

2) The GC has expired without incorporation into an MMEL revision through the normal FOEB process; and

3) The GC is applicable to the operator's aircraft.

b. POIs will coordinate with the appropriate FOEB Chairman, who will be the approving authority for these operator requests. ~~for approval/disapproval of the operator's request.~~

~~c. The FOEB Chairman is the approving authority for all expired GC requests.~~

John S. Duncan
Manager, Air Transportation Division

Lead: Bob Taylor, US Air, 412-474-4355, Robert.Taylor2@usairways.com D2 4 Jan 12. D3 10 Feb 12

Federal Aviation Administration

MMEL Policy Letter (PL) 63, Revision 4 D3

Date:	February 10, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Instrument and Equipment Items Required for Emergency Procedures

MMEL CODE: 00 (General)

REFERENCE: PL-63, Revision 3, dated January 29, 2004
PL-63, Revision 2, dated unknown
PL-63, Revision 1, dated December 23, 1993
PL-28, item 8, dated May 19, 1987

PURPOSE:

To ensure that the instrument and equipment items necessary for the accomplishment of emergency procedures are not given relief in the MMEL

DISCUSSION:

Revision 4 clarifies MMEL relief may be provided for redundant instrument and equipment items used to accomplish an emergency procedure.

Revision 3 removes the “e.g.” (for example) in the POLICY statement since it may lead to misinterpretation. Removal of the example does not change the intent of the policy.

Revision 2 reformats Policy Letter 63 with no change to policy.

Revision 1 was accomplished 12/23/1993.

During a previous regulatory process, two comments were made reference Title 14 of the Code of Federal Regulations (14 CFR) § 121.628, Inoperable Instruments and Equipment. The two comments stated that pilots cannot always comply with the emergency checklist procedures because one or more aircraft systems or components required to accomplish the emergency procedure is inoperative. These comments suggest the rule be amended so that no instrument or equipment item required to accomplish an emergency procedure be included on an MMEL.

The preamble to the MMEL states, "The MEL must not deviate from Aircraft Flight Manual Limitations, Emergency Procedures or Airworthiness Directives." However, most of the MEL problems seem to involve systems or components which are powered by an aircraft's emergency or battery bus. For example:

1. The Douglas DC-9 Flight Handbook, Emergency Procedures, directs the pilot to turn his emergency power switch on when a complete electrical failure occurs in-flight. With the emergency power on, the only communications system available is the number one system and the only navigational system available is the number one system.

2. The Boeing 727 Airplane Flight Manual, Emergency Procedures, directs the pilot to switch the essential power selector to "Stand-by" when a loss of all generators occurs. With the standby power on, the only communication system available is the number one system and the only navigation system available is the number one system.

Most MMEL's state in the Remarks Column "As required by 14 CFR" for the VHF Communications and VHF Navigation (VOR/ILS) Systems. Safety is impacted if an aircraft is allowed to be dispatched (or flight released) with an inoperative communication or navigation system powered by an emergency bus. An emergency would require the flightcrew to switch to emergency power and the inoperative system powered by the emergency bus would not be available to the flightcrew.

POLICY:

1. Each Flight Operations Evaluation Board (FOEB) Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures.

2. Relief may be considered for redundant instrument or equipment items powered by the same (or redundant) power source utilized to accomplish the emergency procedure. FOEB Chairmen must ensure that the accomplishment of emergency procedures remains the priority when considering this relief.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter (PL) 77, Revision 3

Date: **July 5, 2012**

To: All Region Flight Standards Division Managers
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply to Attn of: Manager, Technical Programs Branch, AFS-260

SUBJECT: Cockpit and Instrument Lighting Systems

MMEL CODE: 33 (LIGHTS)

REFERENCE: **PL-77 Revision 2 dated March 12, 2012**
PL-77, Revision 1 dated August 15, 1997
PL-77, Original, dated January 11, 1995

PURPOSE:

To provide standardized MMEL requirements for Cockpit/Flight Deck/Flight Compartment and Instrument Lighting Systems.

Revision 3 revises the proviso concerning systems on the emergency bus.

Revision 2 deletes the global change designation and expands upon the relief intended to be granted in MMELs. Relief for buttons/switch lights or individual annunciations in the cockpit must not be permitted with this PL. These buttons/switches should have relief provided on an individual basis. Any cockpit lighting system associated with an emergency electrical system must be excluded (e.g. cockpit floodlights or dome lights on some aircraft). This PL also includes a reference to operators with night vision goggles (NVG) systems.

Revision 1 is reformatted. The policy is unchanged.

Many aircraft manufacturers include non-essential systems on the emergency bus for convenience (i.e., interior and exterior lighting used by maintenance and servicing personnel). Since these systems are not part of an emergency procedure, they may be deferred as there are no safety-of-flight concerns to address.

POLICY:

Standardized MMEL requirements have been established for Cockpit/Flight Deck/Flight Compartment Lighting Systems and Instrument Lighting Systems. It is important to recognize that this MMEL relief applies only to flight compartment and instrument lighting; it does not apply to warning, caution or advisory lights. Warning and caution systems associated with the inoperative system must be operative unless specifically authorized by the MMEL.

The following standard MMEL proviso and repair category is an example of relief that may be granted in MMELs. Relief for individual button/switch lights and/or annunciations/indications is not intended to be included in this PL. FOEB Chairmen must verify that the lighting relief granted is not associated with an aircraft emergency electrical system.

THE FOLLOWING PROVISO IS AN EXAMPLE ONLY. THE FOEB CHAIRMAN SHOULD ADD RESTRICTIONS THAT REQUIRE EMERGENCY LIGHTING TO BE OPERATIVE.

33 (LIGHTS)		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX-X	Flight Compartment and Instrument Lighting System	C	-	-	Individual lights may be inoperative provided remaining Lighting System lights are: **a) Not required for an emergency procedure,** b) Sufficient to clearly illuminate all required instruments, controls, and other devices for which it is provided, c) Positioned so that direct rays are shielded from flight crewmembers eyes, and d) Lighting configuration and intensity is acceptable to the flight crew. Note1: Individual button/switch lights and/or annunciations/indications are excluded from this relief. Note 2: Unaided operation (without NVGs) may be permitted with inoperative NVG supplemental lights; cracked or missing filters.

Each FOEB Chairman should apply this policy to affected MMELs through the normal FOEB process.

Leslie Smith
Manager, Air Transportation Division

PL 77, R4 D1
Lead – Bob Taylor, US Airways
412-474-4355 Robert.Taylor2@usairways.com

Federal Aviation Administration

MMEL Policy Letter (PL) 77, Revision ~~3~~4 D1

Date: ~~July 5~~XXXXX, 2012

To: All Region Flight Standards Division Managers
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply to Attn of: Manager, Technical Programs Branch, AFS-260

SUBJECT: Cockpit and Instrument Lighting Systems

MMEL CODE: 33 (LIGHTS)

REFERENCE: PL-77 Revision 3 dated July 5, 2012
PL-77 Revision 2 dated March 12, 2012
PL-77, Revision 1 dated August 15, 1997
PL-77, Original, dated January 11, 1995

PURPOSE:

To provide standardized MMEL requirements for Cockpit/Flight Deck/Flight Compartment and Instrument Lighting Systems.

Revision 4 clarifies that the remaining individual lights are not prohibited from being required for an emergency procedure, and that the lights that are required for an emergency procedure are prohibited from being deferred.

Revision 3 revises the proviso concerning systems on the emergency bus.

Revision 2 deletes the global change designation and expands upon the relief intended to be granted in MMELs. Relief for buttons/switch lights or individual annunciations in the cockpit must not be permitted with this PL. These buttons/switches should have relief provided on an individual basis. Any cockpit lighting system associated with an emergency electrical system must be excluded (e.g. cockpit floodlights or dome lights on some aircraft). This PL also includes a reference to operators with night vision goggles (NVG) systems.

Revision 1 is reformatted. The policy is unchanged.

DISCUSSION:
~~Many a~~Aircraft manufacturers may or may not include non-essential Cockpit/Flight Deck/Flight Compartment and Instrument Lighting S~~s~~ystems on the emergency bus for convenience; ~~(i.e., interior and exterior lighting used by maintenance and servicing personnel). Since these systems~~ any that are on the emergency bus but which are not part of an emergency procedure~~, they~~ may be deferred as there are no safety-of-flight concerns ~~to address~~.

POLICY:

Standardized MMEL requirements have been established for Cockpit/Flight Deck/Flight Compartment Lighting Systems and Instrument Lighting Systems. It is important to recognize that this MMEL relief applies only to flight compartment and instrument lighting; it does not apply to warning, caution or advisory lights. Warning and caution systems associated with the inoperative system must be operative unless specifically authorized by the MMEL.

The following standard MMEL proviso and repair category is an example of relief that may be granted in MMELs. Relief for individual button/switch lights and/or annunciations/indications is not intended to be included in this PL. FOEB Chairmen must verify that the lighting relief granted is not associated with an aircraft emergency electrical system.

THE FOLLOWING PROVISO IS AN EXAMPLE ONLY. THE FOEB CHAIRMAN SHOULD ADD RESTRICTIONS THAT REQUIRE EMERGENCY LIGHTING TO BE OPERATIVE.

33 (LIGHTS)		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX-X	Flight Compartment and Instrument Lighting System	C	-	-	Individual lights not required for an emergency procedure may be inoperative provided ~~remaining Lighting System lights are~~: ~~**a)Not required for an emergency procedure,**~~ ~~b)~~a)Remaining lighting system lights are ~~S~~sufficient to clearly illuminate all required instruments, controls, and other devices for which ~~it is~~ they are provided, ~~c)~~b)Remaining lighting system lights are ~~P~~positioned so that direct rays are shielded from flight crewmembers eyes, and ~~d)~~c)Lighting configuration and intensity is acceptable to the flight crew. Note1: Individual button/switch lights and/or annunciations/indications are excluded from this relief. Note 2: Unaided operation (without NVGs) may be permitted with inoperative NVG supplemental lights; cracked or missing filters.

Each FOEB Chairman should apply this policy to affected MMELs through the normal FOEB process.

Leslie Smith
Manager, Air Transportation Division

Lead – Todd Schooler, Cessna Aircraft Co.

Federal Aviation Administration

.

MMEL Policy Letter (PL) 79, Revision 9 Draft 0

Date:	**XX XXX XX**
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Passenger Seat Relief

MMEL CODE: 25 (EQUIPMENT AND FURNISHINGS)

REFERENCE: **PL-79, Revision 8, dated 12 March 12**
PL-79, Revision 7, dated Dec 01, 2009
PL-79, Revision 6, dated Aug 04, 2008
PL-79, Revision 5, dated Jun 01, 2007
PL-79, Revision 4, dated Jun 10, 2005
PL-79, Revision 3, dated Sep 15, 2004
PL-79, Revision 2, dated Mar 01, 2001
PL-79, Revision 1, dated Aug 15, 1997
PL-79, Original, dated Nov 14, 1995

PURPOSE:

To include passenger seats for private aircraft and address concerns associated with 14 CFR 25.815

DISCUSSION:

Revision 9: This revision includes functionality issues with private turbine-powered aircraft and design requirements. Although many business-type jet aircraft are certified under 14 CFR 23 and 25 rules, they are not required to meet many of the rules based on type design including but not limited to seating configuration and operating rules.

Unlike large transport category aircraft that have fixed passenger seats with limited functionality such as recline, private aircraft passenger seats have many features that will allow the seat to move forward/aft, inboard/outboard, rotate 180 degrees and recline. In addition, many of business-type aircraft have side facing seats approved for taxi, takeoff and landing.

Revision 8: Revised Passenger Seat(s) Added subsystem 4: Seat Belt Air Bag Restraint System: Passenger seats, whose positions were certified with airbags using the Head-Injury Criteria (HIC) requirements per CFR 25.562, may not be used if the air bags are inoperable. A seat with an inoperable airbag may be used if the seat position was not certificated using HIC and there is no change to the functionality of the seat belt restraint system.

Revision 7: Revised to provide operator guidance for passenger seat deferrals with seat cushions removed.

Revision 6: Revised the repair category for second set of “Recline Mechanism” provisos from repair category C to D. Removed the (M) from the second set of “Recline Mechanism” provisos when a seat is immovable in the full upright position (seat is already immovable and no maintenance is required). Revised repair category for “Armrest” proviso from repair category C to D. Added an (M) to the existing “Armrest” proviso with a recline mechanism because the seat must be secured in the upright position. Added a second set of provisos to the “Armrest” relief for an armrest without a recline mechanism.

Revision 5 to PL-79: Revised repair category for passenger seats from repair category C to D. Added an (M) to the existing proviso for the recline mechanism. Added a second set of provisos with an (M) to the “Recline Mechanism” when a seat is immovable in the full upright position.

Revision 4 to PL-79: Revised sub-item 3) “Armrest”. The (O) was deleted from the proviso, and proviso a) and b) titles were changed from “Seat” to “Armrest”. Proviso c) was added for an armrest with a recline mechanism.

Revision 3 to PL-79: Added “Armrest” as sub-item 3.

Revision 2 to PL-79: Changed the repair category to C to comply with the PL-52, R 3 (Category D Policy Letter).

Revision 1 to PL- 79: Reformatted the policy letter with no change to policy.

POLICY:

The following standard MMEL provisos and repair categories are adopted for passenger seats, seat recline mechanisms, under seat baggage restraining bars, seat armrests**, and seat belt air bags.**

Seat cushions may be removed at operator discretion due to damage, spills, bio-hazards, etc. when passenger seats are deferred inoperative.

25 (EQUIPMENT/FURNISHINGS)	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions

XX-X	Passengers Seat (Including Side Facing Seat)	D	-	-	May be inoperative provided: a) A seat with an inoperative seat belt or shoulder harness is considered inoperative, b) Seat does not block an emergency exit, c) Seat does not restrict any cabin occupant access to the aisle, and d) Affected seat(s) are blocked and placarded “DO NOT OCCUPY”. NOTE 1: Affected seat(s) may include seats near the inoperative seat(s). NOTE 2: Inoperative seats do not affect the required number of Flight Attendants.
xx ***	Under seat Baggage Restraining Bars	C	-	-	(O) May be inoperative provided: a) Baggage is not stowed under seat with inoperative restraining bar, b) Associated seat is placarded DO NOT STOW BAGGAGE UNDER THIS SEAT, and c) Procedures are established to alert Cabin Crew of inoperative restraining bar.

xx	Armrest	D	-	-	(M) May be inoperative or missing and seat occupied provided: a) Armrest does not block an Emergency Exit, b) Armrest is removed if it restricts any passenger from access to the main aircraft aisle, and c) If armrest is missing, seat is secured in the full upright position.
XX ***	Seat Belt Air Bag Restraint Systems				
	Seat Belt Air Bags Required By CFR	D	-	-	May be inoperative provided affected seat is blocked and placarded DO NOT OCCUPY
	Seat Belt Air Bags Not Required By CFR	D	-	-	May be inoperative or disconnected provided seat belt operates normally.
XX	Seat Controls (includes recline, headrest, footrest, floor tracking, pedestal tracking, swivel and other positioning controls)	D	-	-	(M) May be inoperative and seat occupied provided seat is secured in placarded taxi, takeoff and landing position.
		D	-	-	May be inoperative and seat occupied provided control is failed in placarded taxi, takeoff and landing position.
		D	-	-	May be missing or inoperative in other than placarded taxi, takeoff, and landing position provided affected seat is considered inoperative.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ Greg Kirkland for

John S. Duncan
Manager, Air Transportation Division

Federal Aviation Administration

MMEL Policy Letter (PL) 85, Revision 4 D1

Date:	March 22, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Lavatory Door Ashtray

MMEL CODE: 25 (EQUIPMENT & FURNISHINGS)

REFERENCE: PL-85, Revision 3, dated December 15, 2011
PL-85, Revision 2, dated February 7, 2000
PL-85, Revision 1, dated August 15, 1997
PL-85, Revision Original, dated August 27, 1996
Airworthiness Directive (AD) 74-08-09 R3

PURPOSE:
To establish standardized Master Minimum Equipment List (MMEL) relief for ashtrays installed on or near the entry side of each lavatory.

DISCUSSION:

Revision 4 AD 74-08-09 R3.

Revision 3 omits the Global Change (GC) designation for this PL.

Revision 2 revises policy letter 85 to clarify that only ashtrays installed on or near the entry side of each lavatory are affected by this policy (per AD 74-08-09 R2).

Revision 1 reformatted policy letter 85 with no change to policy.

The FAA AD 74-08-09 R3 is applicable to all transport category airplanes, certificated in any category, that have one or more lavatories equipped with paper or linen waste receptacles. This is a revision to an existing AD originally prompted by fires occurring in lavatories which was caused by, among other things, smoking materials deposited by passengers or crew. AD 74-08-09 R3 provides for an airplane with multiple lavatory doors may be operated with up to 50 percent of the lavatory door ashtrays missing or inoperative, provided 50 percent of the missing or inoperative ashtrays are replaced within 3 days and all remaining missing or inoperative ashtrays are replaced within 10 days. An aircraft with one lavatory door may be operated for a period of 10 days with the lavatory door ashtray missing or inoperative.

Part 25 does not differentiate between crew and passenger lavatories. As such, for MMEL relief purposes, both lavatory types are included in the total lavatory count of an aircraft.

POLICY:

The following provisos are to be used when granting relief for missing or inoperative exterior lavatory door ashtrays:

Note: This relief reflects the provisions found in AD 74-08-09 R3.

25 (EQUIPMENT & FURNISHINGS)		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX-X	Exterior Lavatory Door Ashtrays				
1)	Airplanes with more than one exterior lavatory door ashtray installed	A	-	-	50 percent may be missing or inoperative provided: a) 50 percent (half) of those missing or inoperative are replaced within 3 calendar days, and b) All remaining missing and inoperative lavatories are replaced within 10 calendar days. Note: Both crew and passenger lavatories are included in the total aircraft lavatory count.
2)	Airplanes with only one exterior lavatory door ashtray installed	A	1	0	May be missing provided it is replaced within 10 calendar days.

Each Flight Operations Evaluation Board (FOEB) Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan
Manager, Air Transportation Division

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-98		4/27/2012

Submittal Date	Name and Organization	ATA Section, Item Number	Comment		Lead Response
16 April 12	Todd Schooler Cessna Aircraft Company	34	Cessna Aircraft proposes that all drafted provisos be removed and the following language be added to the POLICY portion of the draft: "The FOEB Chairman must review the AFM and/or Supplements for the FMS equipment installed to determine dispatch limitations. Cessna aircraft publishes operational limitations for every FMS unit installed in each model aircraft regardless of the certification basis. Since a condition of MMEL development is that the relief cannot conflict with an AFM limitation, Cessna will supersede any FAA Policy Letter that is also a Global Change with a proviso that reflects the AFM Limitation that is also a D repair interval.		

MMEL PL DOCUMENT COMMENT LOG

Originating Office:	Document Title / Description:	Project Lead:	Last Update Date:
AFS 260	DRAFT PL-98		4/27/2012

PL-98XX, Rev 10, Draft 10, John McCormick, Fedex, jtmccormickiii@fedex.com, (901) 224-5353

Federal Aviation Administration

MMEL Policy Letter 98XX, Revision 1/D10

Date:	Month dd, yyyy
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

SUBJECT: Navigation Databases

MMEL CODE: 3425 (Navigation)

REFERENCE: PL-98, Revision Original (Draft), dated January 20, 1999, signed by (Quentin J. Smith Jr.).

PURPOSE:

The purpose of this policy is to establish MMEL relief for Navigation Databases as related to Flight Management or Navigation Management Systems.

DISCUSSION:

Revision 1: FAA and Industry have determined that operational safety will be enhanced by standardizing the NAV Database repair category, and by developing alternate procedures for ensuring the information in an out of date navigation database is accurate for current operations. This will allow the continued use of Flight and Navigation Management System Navigation Databases which are no longer current.

The Remarks column for Navigation Databases has been simplified to read "...alternate procedures must be established and used" if RNAV and RNP procedures are to be planned and flown.

The provisos from the original issue of this Policy Letter are applicable when RNAV procedures will not be flown.

Alternate procedures developed by the operator must ensure the intended flight can be conducted safely with Navigation Database out of currency.

Specific alternate procedures should be developed using suitable reference material, such as, but not limited to: Aircraft Flight Manual and FAA Advisory Circulars (e.g., 90-105 U.S. TERMINAL AND EN ROUTE AREA NAVIGATION (RNAV) OPERATIONS, AC 90-101A RNP AR (SAAAR), RTCA documents, associated ICAO reference documents.).

Alternate procedures, (whether accomplished by dispatch organizations, or dispatch organizations in coordination with flight crews, or by flight crews alone), must verify route data for the intended flight from the database which is out of currency against current navigation data (e.g., verification as compared to a current navigation database or current aeronautical charts and other aeronautical data.)

NOTE: In accordance with AC 90-105 "Pilots must not fly an RNAV SID or STAR unless it is retrievable by procedure name from the onboard navigation database and conforms to the charted procedure." After review by the FOPB, a determination was made that the same level of safety intended by the Federal Aviation Regulations could be maintained by these modifications. The FOPB has therefore determined that MMELs should be standardized in accordance with this policy.

In accordance with AC 90-101(series), RNP AR (SAAAR) operations require current FMS Navigation database.

NOTE: This MMEL relief is intended for an FMS Navigation database which is out of currency and no other condition. This relief is not intended for FMS Navigation database which has been incorrectly installed in type/model/series airplane (e.g. 757 database installed in 777).

NOTE: Some airplanes automatically tune approach navigation radios based on navigation database. For these models, if the navigation data is not verified (verified not changed,) then approach navigation radios are required to be manually tuned and identified.

In accordance with AC 90-101A RNP AR (SAAAR) operations require current FMS Navigation database.

Revision 0: Recent industry requests have identified a need for standardizing MMEL Relief for Navigation Databases. Relief has been provided in a limited number of MMELs and is not standardized in terms of repair category. A Navigational Database that has expired should not preclude the use of the Flight Management, or Navigation Management System, provided acceptable alternatives are available as sources of navigation information. After a review by the FOPB, a determination was made that the same level of safety intended by the Federal Aviation Regulations could be maintained by these modifications. The FOPB has determined that MMELs should be standardized in accordance with this policy.
(CONTINUED)

POLICY:

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

34 (NAVIGATION)		Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
XX	Navigation Database	C	-	0	(O) FMS Navigation Database may be out of currency provided: a) Alternate procedures are established and used to verify no change in the associated navigation data, b) RNP terminal procedures, RNAV terminal procedures, and RNAV routes may only be planned and flown provided and verified no change between out of currency navigation database and current navigational charts or current data, NOTE For these operations, data must be verified prior to dispatch. c) RNP AR (SAAAR) procedures are not planned or flown, and d) Approach navigation radios are manually tuned and identified.

C	-	0	(O) FMS Navigation Database may be out of currency provided: a) RNP AR (SAAAR) procedures, RNP terminal procedures, RNAV terminal procedures, and RNAV routes are not planned or flown, b) Current Aeronautical Charts are used to verify enroute navigation fixes prior to dispatch, c) Procedures are established and used to verify status and suitability of navigation facilities used to define route of flight, and d) Approach navigation radios are manually tuned and identified.

Each Flight Operations Evaluation Board (FOEB) Chairman should apply this Policy to affected MMELs through the normal FOEB process.

(AFS 200 Manager Name here), Manager,
Air Transportation Division, AFS-200

FAA MMEL Policy Letters Issued as "Final" in 2012
R87 (As of July 20, 2012)

POLICY LETTER (PL)		
NO. & REV.	**TITLE**	**DATE**
PL-9 R10	Public Address System	1-18-12
PL-56 R5	Flight Deck FWD Observer Seat Relief	1-1-12
PL-58 R4	Flight Deck Headsets and Hand Microphones	3-24-12
PL-63 R4	Instrument and Equipment Items Required for Emergency Procedures	7-5-12
PL-67 R4	Windshear Warning and Flight Guidance	1-15-12
PL-72 R4	Wing Icing Detection Lists	3-12-12
PL-77 R3	Cockpit and Instrument Lighting Systems	7-5-12
PL-79 R8	Passenger Seats Relief	3-12-12
PL-83 R5	Water and Waste on Air Carrier Aircraft	1-18-12
PL-85 R3	Lavatory Door Ashtray Policy	1-1-12
PL-85 R4	Lavatory Door Astray Policy	7-5-12
PL-95 R2	VHF Communications MMEL Requirements	1-15-12
PL-101 R2	Autopilot Relief	12-15-11 (released 2012)
PL-106 R4	High Frequency (HF) Communications MMEL Requirements	1-18-12
PL-112 R2	MMEL Relief for CFR Sec 25.795 Compliant Flight Deck Doors	1-18-12
PL-129 R0	Cockpit Smoke Vision Systems (CSVS)	3-24-12

MMEL POLICY LETTERS (PL) UNDER REVISION
Revision 87 (July 20, 2012)

PL	Rev.	Draft	Subject	Lead	Status			Remarks
					FSIMS (AFS Drafts)		FAA Internal Review	
					Posted	Comments		
25	18	9	Policy concerning MMEL Definitions	Todd Schooler		Yes	Yes	Removed from DRAFT SITE
59	4	7	Global Change Revisions	Greg Janosik		Yes	Yes	Removed from DRAFT SITE
63	4	3	Instrument and Equipment Items Required for Emergency Procedures	Bob Taylor		No	Yes	Removed from DRAFT SITE
76	6	1	ATC Transponders and Automatic Altitude Reporting Systems	Paul Nordstrom			Yes	Removed from DRAFT SITE
77	3		Cockpit and Instrument Lighting Systems	Working Group: Schooler, Landry, Baier, Lesage				
85	4	1	Lavatory Door Ashtray	Greg Janosik				
98	1	10	Navigation Databases	Working Group: McCormick, Landry, Kane, Hofstra, Schooler	Yes	Yes		Comments due 8/1/12
102	2	1	Cargo Compartment Smoke Detection and Fire Suppression Systems	Bob Taylor				
105	2	1	ADSB	Greg Janosik			Yes	Removed from DRAFT SITE
106	5	1	High Frequency (HF) Communications	UPS				
122	1	3	Flight Deck Door Surveillance Systems	Kevin Peters	Yes	No		Comments due 8/14/12

MMEL POLICY LETTERS (PL) UNDER REVISION
Revision 87 (July 20, 2012)

PL	Rev.	Draft	Subject	Lead	Status			Remarks
					FSIMS (AFS Drafts)		FAA Internal Review	
					Posted	Comments		
125	1	2	Equipment Relief without Passengers	Bob Taylor			Yes	
128	2	1	Accessible Lavatory Call System	Greg Janosik			Yes	Removed from DRAFT SITE
130	0	1	MMEL Policy for Nose Gear Steering Systems	Greg Janosik			Yes	To replace PL 114 Inoperative Rudder Pedal Steering

MMEL POLICY LETTERS (PL) UNDER REVISION
Revision 87 (July 20, 2012)

PL	Rev.	Draft	Subject	Lead	Status			Remarks
					FSIMS (AFS Drafts)		FAA Internal Review	
					Posted	Comments		

*******************KEY****************

PL = PL Number
Rev = PL Revision Number (0 [zero] indicates a new PL)
Draft = Draft Number of the proposed PL Revision currently in work (initial draft is number 1 [one])
Subject = PL Title
Lead = Person/group responsible for PL development

Status

DRAFT SITE ("Flight Standards Service (AFS) Draft Documents Open for Comment (http://www.faa.gov/aircraft/draft_docs/mmelpl/)
Posted = Column indicates "Yes" if PL is posted; otherwise column is blank.
Comments = Column indicates "Yes" if comments have been posted to the Draft Document Comment Grid; otherwise column is blank.
FAA Review = Column indicates "Yes" if the PL is in FAA's Internal Review process; otherwise column is blank.

Remarks = Used to provide additional information, examples:
"Comments due 12/30/11"
"Comment period closed, none received'
"Comment period closed, comments received, one or more requires response"
"Comment period closed, all comments acknowledged"
"Removed from DRAFT SITE"
"Removed from DRAFT SITE; new draft in work"
"FAA review complete; PL to go final",

Entire row will be deleted when PL Rev. is posted on FSIMS as final –
(http://fsims.faa.gov/PICResults.aspx?mode=Publication&doctype=MMEL Policy Letters);
PL will then be transferred to the POLICY LETTER STATUS SUMMARY and PLs Issued for Calendar Year documents.

MMEL POLICY LETTERS (PL) UNDER REVISION
Revision 87 (July 20, 2012)

PL	Rev.	Draft	Subject	Lead	Status			Remarks
					FSIMS (AFS Drafts)		FAA Internal Review	
					Posted	Comments		

CHANGES MADE:

Removed:	Changed
PL- 9 R10 PL-43 R2 PL-56 R5 PL-67 R4 PL-83 R5 PL-85 R4 PL-95 R2 PL-101 R2 PL-106 R4 PL-107 R1 PL-112 R2	PL 63PL-25 R18 D5 changed to D6 and remarks changed PL-63 R4 D1 changed to D2 and remarks changed and added “yes” to Posted column PL-58 R4 D5 removed “yes” from Posted and Comments columns PL-72 R4 D10 changed to D11, removed “yes” from Posted and Comments columns and changed remarks PL-122 R1 D2 removed “yes” from Posted column XC (129) R0 D1 changed to D3 and removed “yes” from Posted column

Federal Aviation Administration

MMEL Policy Letter (PL) XXX, Revision 0 GC D1

Date:	July 17, 2012
To:	All Region Flight Standards Division Managers All Aircraft Evaluation Group Managers
From:	Manager, Air Transportation Division, AFS-200
Reply to Attn of:	Manager, Technical Programs Branch, AFS-260

MMEL GLOBAL CHANGE (GC)

This is an approved addendum to all existing MMEL documents. The operator may seek use of the specific relief contained in the PL by revising the Minimum Equipment List (MEL). In doing so, the applicable sample proviso stating the relief in this PL must be copied verbatim in the operator's MEL. Approval of the MEL is gained utilizing established procedures, through the assigned Principal Operations Inspector (POI). This GC expires mm/dd/yyyy.

SUBJECT: Display Units

MMEL CODE: 31 (INDICATING/RECORDING SYSTEMS)

REFERENCE: 14 CFR 91.205, 14 CFR 121.305, 14 CFR 121.307

PURPOSE:

To provide standardized Master Minimum Equipment List (MMEL) requirements for Display Units.

DISCUSSION:

Although display units are normally installed on modern airplanes as part of the original type design, they are also installed on older airplanes as a retrofit to replace traditional instrumentation (e.g. hydro-mechanical, cathode ray tube).

Such equipment is used to display primary flight parameters (e.g. airspeed, attitude, altitude, heading, etc.), navigation information, engine parameters, and system status (synoptic pages). They may include reversionary functions and/or compressed modes that allow different data to be displayed on a single unit (e.g. PFD and ND data displayed on the same panel).

Flight deck configurations with display units may vary depending on the number of installed displays, their allocation in the flight deck, their dimensions, and their functionality (e.g. reversionary functions, compressed mode, etc.).

MMEL policy is necessary to define dispatch with inoperative display units according to flight deck configuration. It should also address relief for display units not required in single pilot operations.

The following factors are taken into consideration in the definition of this MMEL policy:

1. The next worst failure in the MMEL dispatch configuration must allow continued safe flight and landing. It is considered that the next worst failure is the failure of the remaining display on the same side of the flight deck.

2. Relief for displays powered by an emergency bus must not be permitted.
3. Relief can only be granted for RH MFD (Multifunction Display) or ND (Navigation Display) or a secondary EICAS (Engine Indication and Crew Alerting System) display in a flight deck configuration with at least two display units capable of displaying flight information on each side.
4. Relief is permitted for RH display unit for single pilot operations in a flight deck configuration with two or three display units across (e.g. Cessna Mustang, Embraer Phenom).
5. Reversionary functions must allow flight information to be displayed on the same side operative display unit in a non-compressed mode, unless the compressed mode has been certified as primary means of display.
6. The deferral time will be category A, one flight day, for the cases where the next worst failure leaves one side of the flight deck with no display of flight information (i.e. failure of same side PFD subsequent to MFD/ND failure).
7. The deferral time will be category A, three flight days, for the other cases (e.g. one inoperative center display unit in a configuration with 5 or 6 display units across; inoperative MFD/ND in a configuration with HUD).
8. The deferral time will be category C for the single pilot operations case.
9. All remaining display units must be operative.
10. ESIS/ISIS cannot be used as alleviation for an inoperative MFD/ND.
11. The pilot flying must be occupying the left hand seat.

POLICY:

MMEL relief must not be granted for display units powered by an emergency bus.

MFD or ND on the right side of the flight deck, or a secondary EICAS, can be inoperative for dispatch with a deferral time that depends on the total number of displays installed (flight deck configuration) as well as whether flight is conducted dual or single pilot operations.

The following MMEL provisos and repair categories are adopted for items entitled “Display Units”, or equivalent, on passenger and cargo airplanes.

TWO OR THREE DISPLAYS ACROSS
SINGLE PILOT OPERATIONS

31	(INDICATING/ RECORDING SYSTEMS)	Repair Interval	Number Installed	Number Required for Dispatch	Remarks or Exceptions
31-X	Display Units (DU)	C	-	-	Right DU may be inoperative for single pilot operations provided all remaining DUs are operative. NOTE: The pilot flying must be occupying the left hand seat.

FOUR DISPLAYS ACROSS
OR
FOUR DISPLAYS ACROSS AND ONE LOWER DISPLAY

31 (INDICATING/ RECORDING SYSTEMS)		Repair Interval	Number Installed	Number Required for Dispatch		Remarks or Exceptions
31-X	Display Units (DU)					
	1) Right Inboard DU (RH MFD/ND)	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day. NOTE: The pilot flying must be occupying the left hand seat.
	2) Right Inboard DU (RH MFD/ND) (HUD-equipped airplanes)	A	1	0	(O)	May be inoperative provided: a) All remaining DUs and HUD are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days. NOTE: The pilot flying must be occupying the left hand seat.
	3) Lower DU	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

FIVE DISPLAYS ACROSS
OR
FIVE DISPLAYS ACROSS AND ONE LOWER DISPLAY

31 (INDICATING/ RECORDING SYSTEMS)		Repair Interval	Number Installed	Number Required for Dispatch		Remarks or Exceptions
31-X	Display Units (DU)					
	1) Right Inboard DU (RH MFD/ND)	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day. NOTE: The pilot flying must be occupying the left hand seat.
	2) Lower DU	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

SIX DISPLAYS ACROSS

31 (INDICATING/ RECORDING SYSTEMS)		Repair Interval	Number Installed	Number Required for Dispatch		Remarks or Exceptions
31-X	Display Units (DU)					
	1) Right Inboard DU (RH MFD/ND) (DU #5)	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within one flight day. NOTE: The pilot flying must be occupying the left hand seat.
	2) Center Right DU (DU #4)	A	1	0	(O)	May be inoperative provided: a) All remaining DUs are operative, b) Reversionary functions are verified operative, and c) Repairs are made within three flight days.

Each Flight Operations Evaluation Board (FOEB) Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan
Manager, Air Transportation Division

EEMK and AED Utilization for American and Delta Airlines

# of Departing Flights:	July, 98-99	99-00	00-01	01-02	02-August 02	Totals
American	N/A	N/A	867,828	850,416	669,368	2,387,612 (32 months covered)
Delta	406,123	822,451	841,624	825,196	541,323	3,436,717 (50 months covered)
Total Flight Legs:						5,824,329 (82 months covered)
Back-to-back uses:						
American - EEMKs	N/A	N/A	0	1	2	3*
Delta - EEMKs	0	0	0	0	0	0
Delta - AEDs	0	0	0	0	0	0
Frequency of Back-to-Back usage:						
EEMKs (AAL &DAL data):	1 in 1,941,443 flight legs			or	1 every 27.4 months	
AEDs (DAL data only)	0 out of 3,436,717 flight legs			or	0 in 50 months	

* Of these three (3) back-to-back episodes, in 2 cases the kit was changed out between events. In the third case, the nature of the two medical events was such that care was not compromised due to the equipment/medication use on the prior flight leg.