



Federal Aviation Administration

MMEL Policy Letter 86 Revision 5

Date: **January 29, 2010**

To: All Region Flight Standards Division Managers
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply To: Manager, Technical Programs Branch, AFS-260
Attn Of:

Subject: Policy Regarding Air Carrier Compliance with Master
Minimum Equipment List (MMEL) Revisions

MMEL CODE: 00 (GENERAL)

REFERENCE: **PL-86, Revision 4, dated January 4, 2008**
PL-86, Revision 3 (signed by Thomas K. Toula)

PURPOSE:

This policy letter clarifies the intent of the 90-day compliance time for 14 CFR Part 91 Subpart K, 121, 125 and 135 operators to incorporate MMEL revisions into their own MEL. This information modifies any previous instructions related to 14 CFR Part 91 Subpart K, 121, 125 and 135 operator compliance with MMEL revisions.

DISCUSSION:

Revision 5 provides transition guidance on how to disposition MEL deferrals that are open and being tracked at the time more restrictive MEL relief becomes effective.

Revision 4 aligns this policy with MMEL PL-46 regarding the use of the terms "standard" and "interim" revisions.

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

Revision 2 removes the requirement to publish MMEL compliance on the operator's MEL control page. Allows operators and administrators flexibility in dealing with MMEL and MEL compliance.

Revision 1 reflects standardized formatting changes, but policy is unchanged. Reportedly there have been some misunderstandings which have placed unnecessary pressure on Principal Inspectors and on air carriers to incorporate MMEL changes that are not significant to the MMEL revision tracking process. Furthermore, due to the time lag between MMEL revisions and the publication of the airframe

manufacturers recommended (O) and (M) procedures, there may be unique cases where an operator will be unable to incorporate a "required change" to an MMEL item until the recommended procedures can be made available to the operator.

POLICY:

This policy applies to both "standard revisions" and "interim revisions" as defined in MMEL Policy Letter 46.

a. The MMEL revision tracking policy applies only to MMEL changes that are more restrictive (standard revisions) than presently published in the operator's MEL. That is, if the MMEL change provides greater relief (interim revisions) than the operator's MEL, there is no need for any change to the operator's MEL.

b. 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 90 days if deemed necessary.

One reason that an operator might be delayed in adopting a revised MMEL item is the time lag between a MMEL revision and publication of the airframe manufacturers recommended (O) and (M) procedures. In such cases, the operator is expected to incorporate the MMEL changes that are more restrictive than in the operator's MEL, except any that are pending manufacturer recommended procedures. In this case the operator will advise the POI and, if deemed necessary, the POI will consult with the AEG to determine a reasonable target date for the operator to incorporate and publish the MMEL change.

c. If a "standard revision" is not applicable to the operator, the operator should advise the POI of this fact and document it in a means acceptable to the administrator. No operator action is required for an "interim revision".

d. When the new MMEL revision with a more restrictive repair category or proviso is released in an operator's MEL, any affected MEL item that is open at the effective date of the release need not be immediately amended to reflect the more restrictive change. Instead, it may continue to be tracked at its original repair category interval.

e. If the new MMEL revision results in a change to the system or sequence item number, the operator need not close an MEL record and re-initiate it under its new number. Instead, it may continue to be tracked under its original item number until the original repair category interval is reached.

POI's are requested to review these procedures with their 14 CFR Part 91 Subpart K, 121, 125 and 135 certificate holders to ensure understanding and compliance.

John Duncan Manager,
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