



# Federal Aviation Administration

---

## MMEL Policy Letter (PL) 116, Revision 2

---

Date: **October 17, 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

---

### 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 policy letter by revising the Minimum Equipment List (MEL). In doing so, the sample proviso stating the relief in the policy letter must be copied verbatim in the operator's MEL. Approval of the revised MEL is gained utilizing established procedure, through the assigned Principal Operations Inspector (POI). **GC Expiration Date 9/14/2015.**

---

**SUBJECT:** Non-Essential Equipment and Furnishings (NEF)

**MMEL CODE:** 25 (Equipment and Furnishings)

**REFERENCE:** 14 CFR §§ 43.13(c), 91.213, 91.115, 121.628, 125.201, 135.179, and **14 CFR 382, FAA Order 8900.1**, Volume 4, Chapter 4, Section 11

**Revision 2 removes 14 CFR Part 382 items from NEF lists.**

Revision 1 extended the compliance date to April 30, 2008.

**PURPOSE:**

To define NEF and to provide a specific area within the MMEL for dispatch relief of NEF items. This policy letter supersedes Policy Letter PL-33, Passenger Convenience Items.

**DISCUSSION:**

Prior to issuance of this policy, the FAA MMEL provided relief only for Passenger Convenience Items (PCI) that limited relief to the cabin, galley, and lavatory areas. Many operators previously deferred inoperative, damaged or missing items, not located in these areas, now identified as NEF items, via a maintenance carryover provision contained in their maintenance program. Other than under the provisions of an approved MEL, or Configuration Deviation List (CDL), the regulations do not provide for the deferral of inoperative, damaged or missing items identified in the aircraft type certificate. By replacing the Passenger Convenience Items title in chapter 25 of all MMELs with the new term Non-Essential Equipment and Furnishing (NEF), operators may use the deferral authority granted in the MMEL as a basis for developing an operator specific program approved through the MEL that provides relief for inoperative, damaged or missing non-essential items located throughout the aircraft. Although, the NEF program is listed under Chapter 25, it may address items that would fall under other ATA chapters.

**DISCUSSION (continued):**

By definition, NEF items do not affect the safe operation of an aircraft. Due to the wide variance of these items from aircraft to aircraft, a complete list of NEF items is not required to be maintained in the operator's MEL, but in a list or other equivalent method of tracking.

NEF items do not go through the normal FOEB process and are managed by the Certificate Holding District Office (CHDO). The fundamental elements for an operator obtaining approval of a NEF program is the operator's development of procedures and processes for identifying items that may be deferred, development of appropriate procedures, documentation of inoperative, damaged or missing items, reporting of deferrals to the FAA office assigned with program oversight, and procedures for follow-up maintenance. It is not necessary, nor preferred, that every item be listed in the MEL. Operators need not incorporate a list of NEF items in the MEL, but it is probably advantageous for the operator to develop an NEF list (or its equivalent) in the NEF program. Development of such a list will reduce both the operator's and the FAA's time spent analyzing recurring deferrals of the same items. An NEF list (or equivalent) will also provide flight crews, maintenance, and operations personnel, if applicable, with any applicable (O) & (M) procedures necessary for the safe operation of the aircraft. If an operator chooses to develop a NEF list, that list can be maintained in a manner and location agreed to by the CHDO. Operators may specify a repair time frame for the NEF items and may use the current MEL deferral categories at their discretion.

**DEFINITION:** NEF are those items installed on the aircraft as part of the original certification, supplemental type certificate, or engineering order 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 may be installed in areas including, but not limited to, the passenger compartment, flight deck area, service areas, cargo areas, crew rest areas, lavatories, and galley areas. **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 certification rule or for compliance with any operational rule. **NEF lists will not include items required by 14 CFR Part 382.** An operator's NEF process shall not provide for deferral of items within serviceable limits identified in the manufacture's maintenance manual or operator's approved maintenance program such as wear limits, fuel/hydraulic leak rates, oil consumption, etc. Cosmetic items that are fully serviceable but worn or soiled may be deferred under an operators NEF process.

**POLICY:** This policy applies to all aircraft with an established MMEL.

The operator's NEF program must be developed to include the elements of the NEF program guidance found in FAA Order 8900.1, Volume 4, Chapter 4 Section 11.

The operator's NEF program is approved by the FSDO/CHDO via an entry in the operator's MEL in Chapter 25. The NEF procedures and processes, (and list if applicable), used to dispose of NEF items may be located in other operator manuals (including electronic means) agreed to by the CHDO/FSDO. Although the NEF program is listed under Chapter 25, it may address other nonessential items in other ATA chapters. Part 91 operators (other than 91 subpart K) need not submit their NEF deferral program (and NEF list if applicable) to the local FSDO for approval but will make it available for FAA review upon request.

FOEB chairmen will replace "Passenger Convenience" item in MMELs and insert the "NEF" provisions if not already there.

25-XX Passenger  
Convenience/NEF Items

Non-Essential  
Equipment & Furnishings  
(NEF)

- 0 May be inoperative, damaged or missing provided that the item(s) is deferred in accordance with the NEF deferral program. The NEF program, procedures and processes are outlined in the operator's (insert name) Manual. (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 NEF items.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

John S. Duncan  
Manager, Air Transportation Division