EASA

Comment Response Tool

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Certification Specifications - Master Minimum Equipment List (CS-MMEL)
NPA Number	NPA 2011-11

UK CAA (European.Affairs@caa.co.uk) has placed **24** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
85	B. DRAFT DECISION - Book 2 - GUIDANCE MATERIAL TO CS-MMEL	19 - 34	**Page No:** General comment on MMEL Guidance Book **Paragraph No:** Various **Comment:** Many items in the MMEL Guidance Book have had the word "that" added after "provided", when compared with TGL26 and other MMELs generally. This is unnecessary and its removal would restore consistency.	
61	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 23 COMMUNICATI	48 - 84	**Page No:** 59 **Paragraph No:** 23-11-1C **Comment:** Should 'IFBF' be 'IFBB'? Also, remarks against A / - / 1 relief, words 'for flight' should be removed. **Justification:** Documentary errors.	
62	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 23 COMMUNICATI	48 - 84	**Page No:** 64 **Paragraph No:** 23-12-1B **Comment:** It is surprising that there is no proviso preventing dispatch with an inoperative VHF radio that is powered by an emergency bus, as previously included in TGL26. **Justification:** The 'additional considerations' do refer to emergency bus powered systems. However, what other residual means of communication might there be following a total loss of generated power? There appears to be no value in the removal of this proviso.	
63	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 23 COMMUNICATI	48 - 84	**Page No:** 70 **Paragraph No:** 23-30-1A **Comment:** Word "provided" missing between "inoperative" and "procedures". **Justification:** Documentary error.	
64	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS	85 - 122	**Page No:** 102 **Paragraph No:** 25-60-5B	

Cmt	Segment description	Pag	Comment	Attachm
	GUIDANCE BOOK - ATA 25 EQUIPMENT/FU		**Comment:** Category 'C' relief is provided for 'Any in excess of those required...'. Should this be Category 'D'? **Justification:** GM1-CS-MMEL-130	
66	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 25 EQUIPMENT/FU	85 - 122	**Page No:** 108 **Paragraph No:** 25-60-7 **Comment :** The proposed item for Emergency Flotation Equipment is stated as being consistent with TGL26. However, Category D relief is only provided for non-commercial air transport operations. **Justification:** TGL26 allowed Category 'D' relief for operations over land for performance classes 1, 2 & 3.	
67	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 25 EQUIPMENT/FU	85 - 122	**Page No:** 118 **Paragraph No:** 25-63-2 **Comment:** Item title is incorrect. **Justification:** Documentary error. **Proposed Text:** Item title should be "Automatically Deployable Emergency Locator Transmitter (ELT(AD))".	
68	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 25 EQUIPMENT/FU	85 - 122	**Page No:** 119 **Paragraph No:** 25-63-3A **Comment:** Reference to (O) Procedure is missing at beginning of provisos. **Justification:** (O) Procedure is required for alerting crew members of inoperative or missing equipment.	
69	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 25 EQUIPMENT/FU SEATS	123 - 145	**Page No:** 143 **Paragraph No:** 25-21-2-1A **Comment:** Number required for dispatch should be "-". **Justification:** Number required for dispatch is dependent on the aircraft type.	
70	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 33 LIGHTS	213 - 246	**Page No:** 232-234 **Paragraph No:** 33-42-1 **Comment:** Some sub-items are incorrectly numbered 33-41-xx **Justification:** Documentary errors.	
71	C. APPENDICES - I APPENDIX 1 to GM1-CS-	213 - 246	**Page No:** 233 **Paragraph No:** 33-42-1-2	

Cmt	Segment description	Pag	Comment	Attachm
	MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 33 LIGHTS		**Comment:** The addition of tail strobe lights should be considered for inclusion in the title. **Justification:** Anti-Collision Light System may include tail strobe light/s. **Proposed Text:** "Wing-Tip / Tail Strobe Light"	
72	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION FLIGHT INSTRUMENTS	247 - 299	**Page No:** 251 **Paragraph No:** 34-10-1 Primary Airspeed Indication **Comment:** What is the difference between primary airspeed <u>indication</u> and primary airspeed <u>information</u>? If none is intended then the text should use consistent terminology, including that used in the airworthiness requirements, which do not refer to 'airspeed information' displays, just ASIs. In the airworthiness requirements, (e.g. CS 23, 25, 27, 29) an airspeed indicator is a required instrument for each pilot. It is not clear from the proposed text that alleviation is possible only for those instruments which are not essential to meet this requirement. Perhaps it should say "Any in excess of that required for each required pilot may be inoperative", as was the standard clearly stated under TGL26. **Justification:** Self-explanatory.	
73	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION FLIGHT INSTRUMENTS	247 - 299	**Page No:** 264 **Paragraph No:** 34-10-3 **Comment:** The item for Turn and Slip Indicator/Turn Co-ordinator is confusing. Relief has been broken down into two components – "Inclinometer" and "Slip/Skid Indication". The turn indicator is not an inclinometer. **Justification:** Incorrect component description. **Proposed Text:** Use terms "Turn Indication" and "Slip (or Slip/Skid) Indication" in sub-item titles.	
74	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION FLIGHT INSTRUMENTS	247 - 299	**Page No:** 270 **Paragraph No:** 34-10-4 **Comment:** The item for Vertical Speed Indicators is stated as being consistent with TGL26. However, relief is now provided for aeroplanes with 0 required for dispatch, whereas TGL26 required a minimum of 1. Is this intended?	
75	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145:	247 - 299	**Page No:** 276 **Paragraph No:** 34-15-2A	

Cmt	Segment description	Pag	Comment	Attachm
76	MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION FLIGHT INSTRUMENTS	300 - 332	**Comment:** No rectification interval, number required or number installed has been shown. **Justification:** Documentary error.	
	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION NAVIGATION EQUIPMENT		**Page No:** 312 **Paragraph No:** 34-40-1 **Comment:** It is not clear why the word 'helicopters' has been added to the title of the transposed TGL26 ACAS text as TCAS II carriage by helicopters is not mandated. No rationale as to why the word has been added can be found in the supporting explanatory material. **Justification:** TCAS II carriage by helicopters is not mandated but the proposed CS-MMEL text may be interpreted as implying mandated equipage. Note that CAT.IDE.A.155 (see also UK CAA comment against 'Aircraft applicability' page 314) refers to carriage by aeroplanes only. **Proposed Text:** Amend title 'Aeroplanes and Helicopters' to read 'Aeroplanes'.	
77	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION NAVIGATION EQUIPMENT	300 - 332	**Page No:** 312 **Paragraph No:** 34-40-1 **Comment:** ACAS II carriage by helicopters is not mandated, however some helicopters are voluntarily equipped. Similarly, some aeroplanes that are not mandated to be equipped with ACAS II may be voluntarily equipped. Clarification on the applicability of CS-MMEL's ACAS requirements to such aircraft is therefore necessary. **Justification:** TCAS II carriage by helicopters is not mandated, similarly some non-mandated aeroplanes may be voluntarily equipped. Applicability of 34-40-1 to voluntarily-equipped aircraft is not clear, therefore guidance on applicable MMEL procedures is considered appropriate. **Proposed Text:** Amend title '34-40-1 Airborne Collision Avoidance System (ACAS) (MC)' to read '34-40-1 Airborne Collision Avoidance System (ACAS) (if installed) (MC)'	
78	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS	300 - 332	**Page No:** 314 **Paragraph No:** Aircraft applicability	

Cmt	Segment description	Pag	Comment	Attachm
	GUIDANCE BOOK - ATA 34 NAVIGATION NAVIGATION EQUIPMENT		**Comment:** ACAS II carriage by helicopters is not mandated, however some helicopters are voluntarily equipped. Similarly, some aeroplanes that are not mandated to be equipped with ACAS II may be voluntarily equipped. Clarification on the applicability of CS-MMEL's ACAS requirements to such aircraft is therefore necessary. **Justification:** TCAS II carriage by helicopters is not mandated, similarly some non-mandated aeroplanes may be voluntarily equipped. Applicability of 34-40-1 to voluntarily-equipped aircraft is not clear, therefore guidance on applicable MMEL procedures is considered appropriate. **Proposed Text:** Add new explanatory note: 'The requirements of 34-40-1 are also intended to be applied by operators of aeroplanes and helicopters for which the carriage and operation of ACAS II equipment is not mandatory, but are so equipped.'	
79	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION NAVIGATION EQUIPMENT	300 - 332	**Page No:** 314 **Paragraph No:** References CAT.IDE.A.155 **Comment:** In considering the proposals on pages 311-314 it was necessary to refer to CAT.IDE.A.155. Note that CRD to NPA 2009-02B dated 26 November 2010 erroneously states under CAT.IDE.A.155 Airborne Collision Avoidance System (ACAS) that: TURBINE-POWERED AEROPLANES WITH A MAXIMUM CERTIFIED TAKE-OFF MASS OF MORE THAN 5 700 KG OR A MAXIMUM PASSENGER SEATING CONFIGURATION OF MORE THAN 19 SHALL BE EQUIPPED WITH ACAS II.CAT.IDE.A.160 AIRBORNE WEATHER DETECTING EQUIPMENT The following shall be equipped with airborne weather detecting equipment when operated at night or in instrument meteorological conditions (IMC) in areas where thunderstorms or other potentially hazardous weather conditions, regarded as detectable with airborne weather detecting equipment, may be expected to exist along the route: (a) pressurised aeroplanes, (b) non-pressurised aeroplanes with an MCTOM of more than 5 700 kg; and (c) non-pressurised aeroplanes with an MPSC of more than nine.	

Cmt	Segment description	Pag	Comment	Attachm
			The source material is understood to be the subject of a significant typographical error and in any case is believed to have been superseded by CRD to NPA 2009-02b 'Part-NCC and Part-NCO' dated 30 Aug 2011. Part-NCC NCC.IDE.A.140 Airborne collision avoidance system (ACAS) states that 'Turbine-powered aeroplanes with an MCTOM of more than 5 700 kg or an MOPSC of more than 19 shall be equipped with ACAS II'. NCC.IDE.A.145 addresses airborne weather detecting equipment. Furthermore, NPA 2010-03 AUR.ACAS.100 lays down ACAS carriage requirements. Which is the appropriate reference? **Justification:** Clarification. **Proposed Text:** Amend reference to either 'NCC.IDE.A.140' or 'AUR.ACAS.100'.	
80	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 34 NAVIGATION NAVIGATION EQUIPMENT	300 - 332	**Page No:** 329 **Paragraph No:** 34-54-2A **Comment:** Number required for dispatch should be "-" as it is dependent upon those required for the intended route. **Justification:** Documentary error.	
81	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 35 OXYGEN	333 - 376	**Page No:** 362 **Paragraph No:** 52-51-1A **Comment:** Proviso (a) refers to "in accordance with the guidance provided in additional considerations". These words cannot be used in an MEL as they are referring to the EASA MMEL Guidance Book only. **Proposed Text:** "(a) The number of passengers carried and the position of the seats which they occupy is in accordance with the Maximum Passenger Capacity (MPC) table *[see guidance provided in 'Additional Considerations']*, and"	
82	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 35 OXYGEN	333 - 376	**Page No:** 363 **Paragraph No:** 52-51-2 **Comment:** Title should be amended to align with 52-51-1. **Proposed Text:** "Door / Exit (All cargo configuration only)".	
83	C. APPENDICES - I APPENDIX 1 to GM1-CS-	333 - 376	**Page No:** 364 **Paragraph No:** 52-51-2C	

Cmt	Segment description	Pag	Comment	Attachm
	MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 35 OXYGEN		**Comment:** It appears that the intent of this item is to replace the equivalent TGL26 entry which, itself, appeared unclear. It seems that the relief should be for door functions rather than the complete door. **Proposed Text:** "(O) One or more functions may be inoperative for a maximum of 10 calendar days provided:"	
84	C. APPENDICES - I APPENDIX 1 to GM1-CS-MMEL-145: MMEL ITEMS GUIDANCE BOOK - ATA 35 OXYGEN	333 - 376	**Page No:** 375 **Paragraph No:** 52-51-1-1 **Comment:** Proviso (b) refers to "a safe position for take-off and landing". However, the door must be locked closed by some alternative means. **Justification:** To satisfy the relevant security requirements for Flight Crew Compartment Doors.	

Page viewed on 2011-10-20 14:26:17 GMT Copyright © 2005-2011 EASA