

## FINAL COMMENT LOG

Originating Office: <b>AFS-110</b>		Document Title/Description: <b>M MEL B-737 Rev 63, Boeing 737, B-737-100/200/300/400/500/600/700/800/900/900ER</b>			POC and Phone Number: <b>Scott Nielson, Scott.E.Nielson@faa.gov</b>		Suspense Date: <b>06/03/2026</b>	
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response		
John J McDermott AFS 220-3 Concur with comment	2/25/26	VI-XIII	Header on each page and "Note" on VI	"FAA MMEL Policy Application Record"	Suggest reference be changed to "FAA MMEL Policy <i>Letter</i> Application Record" for clarity	Added "Letter" to read "FAA MMEL POLICY LETTER APPLICATION RECORD" on pages VI-XIII		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-6 PDF 23	21-01-04 21-01-05 All Cargo Configuration	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-10 PDF 27	21-04-03 All Cargo Configuration	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-12 PDF 29	21-06-03 All Cargo Configuration	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-43 PDF 60	21-31-04-01 21-31-04-02 21-31-05 21-31-05-01	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-50 PDF 67	21-41-03 Main Cargo Door Heater System	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-56 PDF 73	21-45-04 21-46 21-47	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		
John J McDermott AFS 220-3 Concur with comment	2/26/26	21-57 PDF 74	21-48 Zonal Drying System	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."		

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John J McDermott AFS 220-3 Concur with comment	2/26/26	23-4 PDF 89	23-02-02 Cargo Configuration (Courier/Supernumerary Address System)	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-26 PDF 111	23-19-02-02,03, 03A, 03B Flight Deck Call System, Courier/Supernumerary Visual Alerting System	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-27 PDF 112	23-19-02-04, 04A, 04B Courier/Supernumerary Audio Alerting System	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-29 PDF 114	23-20-02-01A, 23-20-02-02, 23-20-02-02B	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-30 PDF 115	23-21-01A All Cargo Configuration	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-31 PDF 116	23-22 Electronic Voice Checklist	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7, also "moved" in the Item name	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX" Remove "Moved" from item name	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	23-31 PDF 116	23-24, 23-25, 25-01, 25-02, 23-26	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."

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John J McDermott AFS 220-3 Concur with comment	2/26/26	24-4 PDF 121	24-20 Cabin Power Switch	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-5 PDF 126	25-05-02 Cargo Pallet Locks	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-8 PDF 129	25-10 NEF	Format: Dash (-) missing from Repair category column	Insert dash	"-" in Repair Category is not defined in guidance. Relief is based on PL-116 (archived)
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-14 PDF 135	25-14-01 737F and QC	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-15 PDF 136	25-14-03	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-25 PDF 146	25-25, 25-26, 25-27, 25-29	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	25-25 PDF 146	25-31 Supernumerary Seats	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-7 PDF 153	26-14-02 Fire Detection	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-9 PDF 155	26-14-04, 26-14-04-03, 04, 05	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-10 PDF 156	26-14-04-06, 07, 08	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."

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John J McDermott AFS 220-3 Concur with comment	2/26/26	26-14 PDF 160	26-19-01-02	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-15 PDF 161	26-19-02-01,03,04, 26-19-03, 26-19-04-02	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-16 PDF 162	26-19-07,08,09,10	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-17 PDF 163	26-19-11-01,02,03,04, 26-19-12	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	26-18 PDF 164	26-22,23,24,26	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	27-10 PDF 174	27-15 Mechanical Flaps	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	27-14 PDF 178	27-22 Quiet Wing Flaps	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	28-11 PDF 189	28-19 Aft Aux Tank Refueling Valves	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	28-12 PDF 190	28-20 Aft Aux Tank Low Pressure Transfer Lights	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	31-5 PDF 227	31-13, 31-15	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."

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John J McDermott AFS 220-3 Concur with comment	2/26/26	32-2 PDF 229	32-06-01	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7 "Moved" also in Item	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX" Remove "Moved" from item	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	33-4 PDF 239	33-03-02 All Cargo Supernumerary/Courier Area Lighted Information Signs	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12. AFS-160 concurs with use of word "supernumerary." N8900.743 does not apply to MMMEL.
John J McDermott AFS 220-3 Concur with comment	2/26/26	33-5 PDF 240	33-05-02	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	33-6 PDF 241	33-06-01-03 33-06-02	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	33-7 PDF 242	33-07-01 Overwing ice lights	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	34-18 PDF 270	34-26-03-01 Vision One	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	34-20 PDF 272	34-36-01, 34-36-01-07	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	34-24 PDF 276	36-36-03,04	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	34-29 PDF 281	34-52,34-53	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."

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John J McDermott AFS 220-3 Concur with comment	2/26/26	34-31 PDF 283	34-54-03,34-57	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	35-4 PDF 287	35-05D Supernumerary Oxygen Masks	Per N 8900.743 the term "Supernumerary" has been replaced with "authorized persons"	Revise with "authorized persons"	"Supernumerary" wording is in compliance with PL-09, Rev 12.
John J McDermott AFS 220-3 Concur with comment	2/26/26	46-1 PDF 296	46-01-02,03	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	46-3 PDF 298	46-01-07	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	49-5 PDF 304	49-14	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	52-2 PDF 306	52-03-03 Cabin Door Indication System	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	52-7 PDF 311	52-10,11,12	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	52-8 PDF 312	52-13-03,52-13-03-01	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	52-12 PDF 316	52-19,52-20-01	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."
John J McDermott AFS 220-3 Concur with comment	2/26/26	52-13 PDF 317	52-21,52-24	Policy Letter PL 31: "MOVED (applicable to STC xxxxxxx)" Does not match PL 31 #7	Suggest format from PL 31 # 7 "Relief moved to STC XXXXXX Revision XX"	New language: "Relief moved to STC XXX."

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Nelson Acosta AFS-330	2/25/26	52-14	52-26-01	Item (e) action is to cover the exits to obscure the signs and lights.	An explanation as to how this M procedure will be performed, can be beneficial for maintenance personnel	Item 52-26-01 provisos requirements are per PL-125.
AFS-400				No comments.		
AFS-800				No comments.		
Public Comments						
Chris Heck ALPA, Intl. Chris.Heck@alpa.org	2/27/26	318	Door Slides – 52-26-01 b)	<p>The requirement of only 1 door slide for dispatch, in combination of carriage of up to 19 authorized persons, introduces a level of unacceptable risk to occupants on board. The remaining exit, to include its respective door slide, may be rendered unusable in an emergency egress scenario due to unforeseen factors. These include, but are not limited to, factors such as a gear collapse or fire hindering access and pathway to remaining exit and door slide. A gear collapse may place the aircraft at such an angle that hinders the door slide from being deployed for the purposes of emergency egress. An interior fire may block the path to the single remaining operational door slide. Additionally, a fire in the immediate exterior area of the exit location may render the single remaining operational door slide unusable for deployment and egress.</p> <p>The proviso does not state if any other emergency exits are still available. It should be stated that in order to carry 19 people on board, at least 2 accessible exits are needed to comply with 14 CFR part 25.807 emergency exits. As this regulation also stated, there needs to be at least 1 Type III exit on each side to the aircraft to ensure egress during emergency situations blocking one side of the aircraft.</p>	Remove relief that allows for a maximum of 19 authorized persons to be carried on-board with a single operational door slide. A single remaining door slide may be rendered unusable during an actual emergency egress scenario.	Item 52-26-01 provisos requirements are per PL-125.

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Chris Heck ALPA, Intl. Chris.Heck@alpa.org	2/27/26	318	Door Slides - 52-26-01 c)	Unobstructed access to the operative exit and door slide cannot be assumed in the relief with only one operational door slide. During an emergency egress scenario the location of actual usable exits, whether regular or emergency, may differ from those assumed to be usable at the time of MEL application and dispatch. The remaining exit, including its respective door slide, may be rendered unusable in an emergency egress scenario due to unforeseen factors. These include, but are not limited to, factors such as a gear collapse or fire hindering access and pathway to the remaining exit and door slide. A gear collapse may place the aircraft at such an angle that hinders the door slide from being deployed for the purposes of emergency egress. An interior fire may block the path to the single remaining operational door slide. Additionally, a fire in the immediate exterior area of the exit location may render the single remaining operational door slide unusable for deployment and egress.	Remove relief language as contained in proviso C). Unobstructed access to a single remaining operative exit door slide cannot be assumed to be a constant variable under an actual emergency egress scenario.	Item 52-26-01 provisos requirements are per PL-125.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	21-7	21-02	Why; "NOTE: Refer to MMEL Item 21-01, Air Conditioning Packs"? Proviso b) states "is considered inoperative". Everyone knows what "considered inoperative" means (per PL 25). This is extraneous and redundant and seems to be used quite often in various MMEL's.	Delete all such Notes.	NOTE is meant to comply with requirements of item considered as inoperative.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	21-8	21-02-04B	Proviso b): delete the words "An" and "a". or Alternatively, consider Revising to: <ul style="list-style-type: none"> <li>▪ "Unpressurized and No Bleed Takeoff's are <i>not permitted.</i>" (or <i>not allowed</i> or <i>not authorized</i>) or</li> </ul> "Pressurized Takeoff's are conducted (required)."	Consider proposed changes to verbiage.	Appropriate as is. Verbiage is consistent with FCOM supplementary procedure call out.

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Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	22-10	22-18-01-02A	Why A/P Approach prohibition? When an A/P Engage switch is selected, CMD/CWS is displayed in the A/P status display (to confirm engagement).	Consider leaving as is.	Autopilot not to be used because both A/P ENGAGE Command (CMD) switch lights are required for CAT IIIa and CAT IIIb operations. This is due to the fact that the flight crew cannot be sure that both autopilots are functioning during approach when dispatching with one CMD switch light is inoperative.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	23-32	23-30	Why is this relief limited to only those units installed by Boeing SB or "production equivalent"? As for "production equivalent"; what does that mean? Any other ULD/ULB with TSO/PMA or only those installed during production at the factory (regardless if it's the same make and model as what's listed in the SB?). PL 120 doesn't limit what ULD's its effective to. Can't an operator buy a ULD w/PMA and install and have relief (per PL120)?	Consider deleteing: "(-600/-700/-800/-900/-900ER upon incorporation of Boeing Service Bulletin 737-23-1605 or production equivalent)". This item includes the triple asterisks (***)"	LF-ULB/ULD installation is offered on -600/-700/-800/-900/-900ER only via SB 737-23-1605. STC installation's RAL is moved to FAA website. <a href="http://drs.faa.gov">http://drs.faa.gov</a>
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	28-8	28-10	What does this note mean: NOTE: MMEL Item 28-10 relief may not be applied to <u>defer maintenance</u> of an inoperative system or indication for which an MMEL Item 28-10 subitem exists.	We don't apply MMEL's to defer maintenance. We defer repair. Its just non-standard to include "defer maintenance". I believe the intent is that the higher level MMEL (28-10) isn't used in lieu of the other 28-10 sub-items (28-10-0x)? Could read: "MMEL Item 28-10 sytem relief is not intended to be used to defer inoperative subsystem components for which there is relief, i.e. 28-10-0x."	Revised NOTE.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	33-5	33-05	There isn't a switch for a "High Intensity" lighting nor do I fond it in the AMM.	The title needs to be changed to reflect actual installation. Title should be: "Strobe Lights", if you must keep "High Intensity" then it can be "High Intensity Strobe Lights" but the word "or" has to go because there isn't either a "Strobe" light or a "High Intensity" light.	Deleted "High Intensity" wording from item heading.

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Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	33-5	33-05-01	"All Models" is not necessary.	Delete this row in its entirety.	Deleted item 33-05-01 and added options to item 33-05.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	33-5	33-05-02	Highlights states; "Revised qty from 1 to 3" when in actuality this item is <u>moved</u> to STC's.	Correct or delete Highlights entry.	Deleted entry from Highlights.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	35-4	35-05A	Highlights state: "Revised proviso e) for clarification".	This verbiage makes it less clear. Is there ever a 14CFR requirement [that affects any model of the 737 CL/NG] that would be a different percentage than 10%? Can we maintain the current verbiage?	Revised proviso e) to reference 14 CFR requirement and permit the operator determine the portable oxygen capacity requirements of the aircraft, subject to their operation.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	49-1	49-01A	Proviso b) is inaccurate. APS2000 APU's with SB's -49-82 and -49-85 do NOT require inspection.	90% of the time, the <u>Item</u> column is used to delineate applicable aircraft model or model/part number the relief is applicable to, but in this case the effectivity information (i.e. APU model) is put into proviso b) and includes insufficient information.  49-01A Item column could be effective to APS2000 APU's w/out SB's xxx, 49-01B Item column could be for APS2000 APU's with SB's xxx and 49-01C Item column could be for GTCP36-280 & AS 131-9B. 49-01D Item would be APU removed.	Split item into sub-item 49-01-01 (airplane without APU APS2000) and 49-01-02 (airplane with APU APS2000) with options.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	49-1	49-01B	Proviso d) requires inspection of APU compartment after 1 <sup>st</sup> flight then every 100 hours.	What drives the requirement of proviso d)?	This proviso is based on AMM Task 49-11-02-040-801 step 2., H., (3).

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Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	49-2	49-06A	<p>This Item now requires the door to be deactivated in the fully open position.</p> <p>Is there historical and empirical evidence (events) where a door that was inoperative open (i.e. can't close/won't close on command) moved [uncommanded] to the closed position while in use...while in flight...during ETOPS flights?</p> <p>How many years has it [not been required] to deactivate the door open (presumably without uncommanded movement to the closed position)?</p>	Remain as " <i>May be inoperative in full open position</i> " if there isn't substantiating events that would necessitate the need to deactivate the door.	Converted DDG (M) NOTE step to deactivate air inlet door in full open position into proviso requirement.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	49-2	49-06B	Why the Note referring to the APU MEL Item? Proviso a) reads; "...is considered inoperative." we all know what that means per PL 25.	Delete all such Notes.	NOTE is meant to comply with requirements of item considered as inoperative.
Jim Ward Southwest Airlines Jim.Ward@wnco.com	3/06/26	49-3	49-06C	<p>Why does it have to be "deactivated" Closed? If it won't open (on command), then why the (M)? Is there history of and actual events where inoperative [closed] inlet doors are moving uncommanded to the open position?</p> <p>Why the Note referring to the APU MEL Item? Proviso b) reads; "...is considered inoperative." we all know what that means per PL 25. This is extraneous and redundant information.</p>	<p>Do not include proviso to deactivate APU Inlet Door in the closed position.</p> <p>Delete all such Notes.</p>	<p>Relief is updated for better alignment to 737 MAX MMEL item.</p> <p>NOTE is meant to comply with requirements of item considered as inoperative.</p>
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	21-9 & 22-7 & 27-5	21-02-06B & 22-15-02A & 27-04-02-04	R&E statement should read "may be" with a space between "may" and "be."	Add space between "May" and "be" in items: 21-02-06B, 22-15-02A, and 27-04-02-04.	Added space between "May" and "be" in items: 21-02-06B, 22-15-02A, and 27-04-02-04.

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	23-2	23-01-02A	<p>Proviso c) in item 23-01-02A has a typographical error.</p> <p>The word "area" should be "are."</p> <p>This correction will align language in the other 23-01 items</p>	<p>Correct item 23-01-02A proviso c) to read:</p> <p>"c) TAWS (GPWS) advisory callouts <b>are</b> considered inoperative, and"</p>	<p>Corrected item 23-01-02A proviso c) to read:</p> <p>"c) TAWS (GPWS) advisory callouts <b>are</b> considered inoperative, and"</p>
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	23-32	23-30B	<p>Item 23-30B for LF-ULD relief (CAT D) R&amp;E states, "May be inoperative provided procedures do not require its use."</p> <p>It is fully understood this is the exact language from FAA MMEL PL-120 for CAT D relief.</p> <p>There is strong belief that FAA MMEL PL-120 LF-ULD CAT D relief contains an error and should state "May be inoperative <b>or missing</b> provided procedures do not require its use."</p> <p>Adding "or missing" will provide the same "missing" allowance in the CAT C MMEL relief.</p> <p>Please note, 787, 737-MAX, and A350 FAA MMEL relief have already approved the addition of "or missing" into LF-ULD CAT D MMEL relief.</p> <p>Reference: 787 FAA MMEL 23-24-03A 737-MAX FAA MMEL 23-25-01B A350 FAA MMEL 25-69-02A</p>	<p>Add "or missing" to the LF-ULD CAT D MMEL relief.</p> <p>It is recommended the R&amp;E state "May be inoperative or missing provided procedures do not require its use."</p>	<p>Added "or missing" to the LF-ULD/ULD Category D MMEL relief.</p>

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	25-4 & 25-5	25-05	<p>The title for item 25-05 previously stated "(Includes -800BCF and STC ST022556SE)." The STC reference has been deleted from the manual.</p> <p>Because the STC's have been deleted from all titles, the word "includes" in the effectivity does not add value and appears elude something plus the 800BCF is allowed this relief.</p>	<p>Recommend deleting the word "includes" from the item effectivity.</p> <p>Recommend only stating "(-800BCF)" to clearly identify effectivity.</p>	Deleted the word "Includes" from Item heading.

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	28-8	28-10	<p>Newly added NOTE <i>"MMEL Item 28-10 relief may not be applied to defer maintenance of an inoperative system or indication for which an MMEL Item 28-10 subitem exists,"</i> is not reasonable.</p> <p>The wording of this NOTE implies that if any or all listed sub-systems are inoperative, then the operator must apply all of the individual sub-items before (and possibly in addition to) applying the main system MEL.</p> <p>This NOTE directly implies that if the listed sub-system items were inoperative, the operator must apply all of the sub-system MELs instead of one simple entire system MEL.</p> <p>Because the main Pressure Fueling System MMEL item 28-10 imposes a more restrictive alternate procedures requirement (meaning the operator must fuel using alternate manual fueling), it is in the operator's best interest to apply a less restrictive sub-system MMEL whenever possible.</p> <p>Imposing that an operator must apply multiple individual less operationally restrictive sub-system MMEL relief items before applying the more restrictive entire-system MMEL, does not make sense.</p> <p>This NOTE implies a direct requirement instead of providing additional information to assist with compliance.</p> <p>This NOTE creates significant confusion, imposes unneeded additional MEL applications, and would directly prohibit operator authorized Flight Crew MEL application to an entire system.</p> <p>This NOTE should also be deleted from 737-MAX FAA MMEL item 28-21-01.</p>	<p>Delete this new NOTE from 737-Legacy/Classic/NG MMEL item 28-10.</p> <p>The NOTE does not make sense because it mandates installation of less-restrictive sub-system relief.</p> <p>The NOTE mandates a restriction of the entire-system MMEL relief, which is not the purpose of informative NOTES (the NOTE reads like a proviso restriction).</p> <p>This NOTE appears to try to flip-flop historical MMEL philosophy that sub-system relief is less restrictive, and that now sub-system should now be more restrictive. This philosophical flip-flop is not inline with acceptable interpretation.</p> <p>At the next 737-MAX FAA MMEL revision, recommend deleting this NOTE from 737-MAX MMEL item 28-21-01.</p> <p>Delete this NOTE that implies sub-system relief is more restrictive than entire-system MMEL relief.</p>	<p>Revised NOTE as follows:</p> <p>NOTE: MMEL Item 28-10 system relief is not intended to be used to defer subsystem components for which an MMEL Item 28-10 subitem exists.</p>

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	28-9	28-11	<p>For item titled "Fueling Bay Fuel Cap," the R&amp;E statement "may be inoperative" was added into Rev. 63. Previously this was blank with no R&amp;E.</p> <p>Many operators have used this relief when the cap was inoperative and not able to be re-installed in a "missing" condition.</p> <p>Because this is an optional installation as designated by "****," adding a "missing" condition appears to be allowed.</p>	Recommend changing MMEL item 28-11 R&E to read "May be inoperative or missing."	Added "missing" in proviso to read "May be inoperative or missing".
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	28-9	28-10-04	<p>It does not make sense to mandate the Fuel Quantity Indication system is operative when the Fuel Float Switches (for the auto-shut off) are inoperative.</p> <p>Using alternate fueling procedures, it is very easy to manually fuel the aircraft without an operational fuel quantity indication. This is accomplished by sticking the tank prior to fueling, calculating how much fuel to add into the tank (in gallons/liters), using fuel truck delivery gauge to monitor the calculated need gallons/liters to add, and then verifying aircraft fuel load added by again sticking the tank.</p> <p>This is not a safety of flight concern.</p> <p>Float switches for auto-shutoff only help to provide assistance for more efficient fueling of the aircraft while on the ground.</p> <p>This commentator believes the proviso needs to MMEL item 28-10-01 proviso b) needs to state "alternate procedures are established and used." This will ensure the correct alternate fueling procedures are created and used.</p>	Replace MMEL item 28-10-01 proviso b) with "alternate procedures are established and used."	<p>Will propose withdrawing proposed relief as Boeing engineering is conducting further internal review. 5/6/2026</p> <p>Will re-propose it in future MMEL revision.</p>

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	26-14 & 26-15 & 26-16 & 26-17	26-19-01-01 & 26-19-02-02, 26-19-04-01 & 26-19-05, 26-19-06 & 26-19-13	<p>In previous revisions, MMEL titles for items 26-19-01-01, 26-19-02-02, 26-19-04-01, 26-19-05, 26-19-06, and 26-19-13 stated <i>“Boeing Installed System (and then a list of also approved STCs).”</i></p> <p>The list of STCs was deleted throughout the entire MMEL manual in Rev. 63.</p> <p>The title statement “Boeing Installed System” is not needed because now all MMEL relief is a Boeing installed system.</p> <p>If it is discussed the statement “Boeing Installed System” should remain, then on the flip side of this argument there would need to be a consideration that all MMELs should have a “Boeing Installed System.” This statement is not needed in any MMEL now that the STCs are deleted from the 737 MMEL, so it should be deleted.</p>	<p>Delete title statement “Boeing Installed System” from the following MMEL items:</p> <p>26-19-01-01, 26-19-02-02, 26-19-04-01, 26-19-05, 26-19-06, and 26-19-13.</p>	<p>Item 26-19-01-01: Replaced “Boeing Installed System” with “Opposite Loop Operative”.</p> <p>Items 26-19-02-02, 26-19-05, 26-19-06 and 26-19-13: Deleted “Boeing Installed System”.</p> <p>Item 26-19-04-01: Replaced “Boeing Installed System” with “Extinguisher Bottle(s) Charge Verified”.</p>
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	33-5	33-05-01	<p>The “All Models” subtitle is left over language used in previous revisions that stated, “All models except (this list of STCs).”</p> <p>Because the STCs have been removed from Rev. 63, this “All models” does not have a purpose. Unless effectivity is specifically identified in the MMEL item title, the 737-Legacy/Classic/NG FAA MMEL Rev. 63 includes all models.</p>	<p>Delete “All Models” title language from item line 33-05-01.</p> <p>Sequence number 33-05-01 is not needed and should be deleted.</p> <p>Listing the main system title as 33-05 and then moving directly to items 33-05-01A and 33-05-01B is sufficient.</p>	Deleted Item 33-05-01, Added options to item 33-05.
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	34-8	34-15-03A	There is a typographical error in the standard R&E language. The word “alternative” should be “alternate” to align with common used MMEL language.	<p>Change R&amp;E language to:</p> <p>“(O) May be inoperative provided <b>alternate</b> procedures are established and used.”</p>	Reworded from “alternative” to “alternate”.

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<p>Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com</p>	3/06/26	34-19	34-35	<p>Inertial Reference System (IRS) MMEL item 34-35 relief is proposed for deletion in Rev. 63.</p> <p>Although this deletion aligns to the 737-MAX (that was deleted due to known problems and concerns with the 737-MAX), the 737-NG has a long history of safe successful IRS MEL application and use.</p> <p>This 737-NG IRS MMEL has numerous operational restrictions to maintain safe operation when the MEL is applied. The required repair time (CAT B) is also very short.</p> <p>When this MMEL relief is used, it is used to only bring the aircraft back to a maintenance base where the aircraft is repaired.</p> <p>Although this MMEL relief is very rarely used and can only be used during the daytime in exceptionally good weather, it is extremely useful for allowing the aircraft to travel home to a repair station... especially from foreign countries.</p> <p>The MMEL relief mandated one of the two installed IRS's to remain fully operational.</p> <p>With the listed restrictions in Rev. 62, there is a proven safety record of operating with one of two IRS's inoperative on 737-Legacy/Classic/NG aircraft.</p>	<p>Do not delete MMEL item 34-35 for the IRS.</p> <p>This commentor is acceptable to considering having the MMEL become even more operationally restrictive to keep relief (i.e., restricting repair category to CAT A with a 1, 2, or 3 flight repair time).</p> <p>IRS MMEL relief has been listed and available for greater than 40 years (earliest reviewable 737 MMEL is Rev. 22 published March 1986).</p> <p>For greater than four decades, IRS MMEL relief has been used to safely bring aircraft home to a repair station.</p> <p>Do not delete IRS MMEL item 34-35.</p>	<p>Current Item 34-35 DDG (O) procedure requires associated IRS mode selector switch for the inoperative IRS to OFF. "SPEED TRIM FAIL" light always illuminates when either L or R IRS is turned off. Relief for both "Speed Trim Fail Light System" and "Speed Trim System" were deleted in MMEL Revision 61.</p>

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	35-1	35-02	<p>At the last 737-MAX MMEL revision (Rev. 6), the associated 737-MAX MMEL item 35-21-02 was split apart into separate "Passenger Service Units," "Attendant Service Units," and "Lavatory Service Units" sub-items. The main item title was labeled as "Oxygen Service Units."</p> <p>Many operators have a mixture of 737-NG and 737-MAX aircraft in their fleet. Consistency of MMEL usage and language between NG and MAX MMELs is always beneficial.</p> <p>Now would be a suitable time to align 737- NG MMEL item 35-02 to the same individual "Oxygen Service Unit" listings found in 737-MAX MMEL Item 35-21-02</p>	<p>Recommend splitting 737-NG FAA MMEL item 35-02 into separate "Passenger Service Units," "Attendant Service Units," and "Lavatory Service Units" for alignment to 737-MAX FAA MMEL 35-21-02.</p> <p>See end of this comment log for 35-02 draft proposal.</p>	This item will be part of CL/NG MMEL Items alignment effort with MAX MMEL Items in Rev 64.

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	49-1	49-01-01A	<p>Create separate MMEL titled items for aircraft "with APS2000 APU" and "without APS2000 APU." Do not list proviso requirements that are dependent upon a specific part (or modification) configuration.</p> <p>This operator has experienced situations where an MMEL proviso is labeled as applicable only to certain parts or modification configurations and we did not have that configuration. We have been required to include the entire proviso as written in the FAA MMEL into our operator MEL even though that configuration was not applicable to our fleet. We then had to add statements to our operator MEL that none of our aircraft were configured in the manner labeled in the MMEL.</p> <p>This creates bizarre situations where we are required to include an MEL proviso stating, "do this" and then must add an additional statement "you don't need to do this because we don't have this."</p> <p>When an MMEL items are listed as individual separate deferral items with the part (or modification) status embedded in the title, we simply select the applicable titled item and do not have this proviso related problem.</p> <p>Based on Boeing Service Letter 737-SL-49-052, only 737 aircraft manufactured after April 1997 might be affected by this inspection requirement. Placing operators in a situation where they need to list an MMEL proviso for configurations that have not been included by the manufacturer for 29 years, is not helpful to the operator.</p> <p>We are very appreciative this inspection requirement is being addressed in the MMEL, we simply ask the MMEL item be split apart into separate titled "with" and "without" APS2000 APU items.</p>	<p>Remove the "Airplane with APS2000 APU...." proviso from the Remarks and Exceptions and list it as part of the title.</p> <p>Split 49-01A into 49-01-01A and 49-01-02B versions as follows:</p> <p>Sequence #: 49-01-01A Item: Auxiliary Power Unit (APU) with APS2000 APU Repair Cat.: C # Ins.: 1 # Req.: 0 R&amp;E: Except for ETOPS, may be inoperative provided:</p> <ol style="list-style-type: none"> <li>Procedures do not require its use, and</li> <li>Perform a visual inspection of tail cone area and adjacent control surfaces to confirm there is no evidence of damage or delamination.</li> </ol> <p>Sequence #: 49-01-02A Item: Auxiliary Power Unit (APU) without APS2000 APU Repair Cat.: C # Ins.: 1 # Req.: 0 R&amp;E: Except for ETOPS, may be inoperative provided procedures do not require its use.</p> <p>See end of this comment log for 49-01 draft proposal.</p>	Split item into sub-items 49-01-01 (airplane without APU APS2000) and 49-01-02 (airplane with APU APS2000) with options.

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Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	49-1	49-01B	The new removed APU MMEL 49-01B has a weight and balance adjustment requirement.  This commentor believes an (O) procedure should be required to ensure W&B adjustments are accounted for during flight planning.	Add (O) procedure requirement to APU removed MMEL relief due to significant weight and balance change with a removed APU.	Added (O) procedure requirement.
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	49-1	49-01B	Proviso “b)” of the APU removed allowance is a duplicate of the opening R&E statement.  It is very odd to state “(APU) may be removed provided APU is removed.”  Proviso “b) APU is removed, “ should be deleted because it is a duplicate of the opening statement.	Delete item 49-01B proviso “b) APU is removed.”  See end of this comment log for 49-01 draft proposal.	Deleted item 49-01B proviso “b) APU is removed.” and replaced with “b) APU is deactivated.”
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	49-1	49-01B	Proviso “c) APU switch remains OFF” does not fully incorporate the needs of the APU removed MMEL allowance.  There is an AMM deactivation procedure that must be accomplished when the APU is removed for MMEL application. A better proviso requirement would be “APU System is deactivated.”  This commentor believes a “switch remains off” comment is not needed in this MMEL and is redundant. By application of an MMEL, that affected item is considered inoperative and is not allowed to be used which automatically implies the affected system must remain off.	Change item 49-01B proviso to “c) APU is deactivated.”  See end of this comment log for 49-01 draft proposal.	Deleted item 49-01B proviso “b) APU is removed.” and replaced with “b) APU is deactivated.”

Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
Gary Jackman Alaska Airlines Gary.Jackman@AlaskaAir.Com	3/06/26	49-1	49-01B	<p>This commentor questions if the <i>“Perform a visual inspection of tail cone area and adjacent control surfaces to confirm there is no evidence of damage or delamination”</i> requirement should be listed for aircraft that with a removed APS2000 APU.</p> <p>It seems like this same inspection requirement would hold true anytime an APS2000 APU remained installed as inoperative or was removed as inoperative.</p>	<p>Determine if “removed” APS2000 APU MMEL conditions require tail cone and control surface visual inspections. If yes, add this requirement and list under the “with APS2000 APU” titled MMEL item.</p> <p>See end of this comment log for 49-01 draft proposal.</p>	Added proviso b) requiring tail cone and control surface visual inspection.