

FINAL COMMENT LOG

Originating Office: AFS-130		Document Title/Description: MMEL CE-525B Rev 4, Textron Aviation Model 525B Citation		POC and Phone Number: Brett Hoben, Brett.Hoben@faa.gov		Suspense Date: 12/15/2025
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
John J McDermott AFS-220-3 Concur with comment	5/19/25	26-1 PDF 49	26-64-01 Life Raft	Suspect this item was meant for inclusion in the previous page, 25-8, equipment/furnishings, ATA 25.	Verify and move to ATA 25.	Textron Aviation agrees. Relocated Life Raft to ATA 25.
AFS-300				No comments.		
AFS-800				No comments.		
Public Comment						
David Burk Aerodox	5/29/25			General comment. Many places the MMEL shows, "as required by 14 CFR". Sometimes this leads to a discussion, does this relate to Certification and/ or Operating Rule?	Add, "operating rule" to those items. The CE-525 MMEL does align with this wording.	Textron Aviation agrees. Revised per suggestion.
David Burk Aerodox	5/29/25	21-1	20-06	Number required shows "0" but remarks show, "One may be inoperative."	Suspect remarks are intended for -21-06 and not -20-06, move remarks to 21-06.	Textron Aviation agrees. Revised proviso to state "May be inoperative".
David Burk Aerodox	5/29/25	21-2	30-02-00A	This is one example where it would help the operators to add a sub item number to all MMEL items. Some like this one has -00A for the first item, but the next item does not have a sub item number.	For cases like this add an additional sub item number, in this case maybe use -00A, -00B (for the second set of remarks), -00C, and finally -00D. Utilize this type numbering throughout the MMEL for consistency ensuring each MMEL item has an individual item number.	Textron Aviation agrees. Added sub item numbers.
David Burk Aerodox	5/29/25	21-7	33-03	Item has C/2/1 with remarks "May..".	For consistency, change wording to, "One may be inoperative provided both pressure regulating valves are operative."	Textron Aviation agrees. Revised proviso to state "One may be inoperative".
David Burk Aerodox	5/29/25	22-1	10-01-00C	The title, "(All buttons failed)", can sometimes be confusing as to what the relief is referring to.	Suggest changing "(All buttons failed)", to Left/Right Control Wheel	Textron Aviation agrees to revise title to "Both". Left/Right is defined in previous items.
David Burk Aerodox	5/29/25	22-8	30-01	Since this is not a standard item, optional, seems this item needs the ***.	Add *** to title.	This item is standard for this block point and will be serialized.

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David Burk Aerodox	5/29/25	23-1	00-01	Item only has option for when procedures do not require its use. This could be interpreted that when procedures do require its use the item must be operative.	Since this optional and not required by operating rules, remove the remarks for main item and -01. Other option would be to add additional "C" relief like other MMEL items.	Textron Aviation Agrees. Removed proviso from main item and added additional "C" relief.
David Burk Aerodox	5/29/25	23-1	00-01-03	The remarks, "May be inoperative" are not standard throughout the MMEL, most items are blank and do not have this wording.	Remove "May be inoperative" for standardization.	Textron Aviation Agrees. Removed Provisos that state "May be inoperative"
David Burk Aerodox	5/29/25	23-2	10-01-00B	Does the aircraft SATCOM system meet the requirements of AC 20-150B, if not remove this set of remarks.	Remove this set of remarks of aircraft does not comply with AC 20-150B.	Textron Aviation Agrees. Removed Dual LRCS relief.
David Burk Aerodox	5/29/25	23-3	12-01	Proviso a) states, "Affected system is not on an emergency bus". This can be somewhat confusing to the operators	If there is a VHF system that is installed on the Emergency Bus, then state which system that would be for, if not remove this statement.	Textron Aviation agrees. Revised proviso.
David Burk Aerodox	5/29/25	23-3	12-01-01	MMEL only has remarks for when procedures do not require its use.	Need to add an additional set of remarks with a "C" restriction and alternate procedures are established and used.	Textron Aviation agrees. Added additional "C" relief.
David Burk Aerodox	5/29/25	23-4	20-03	The two titles are somewhat confusing and not MMEL standard.	Remove the (SELCAL not required) and (SELCAL required) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed the title entries.
David Burk Aerodox	5/29/25	23-6	50-05	This item the way it is written is very confusing as to what the relief is for.	Suggest aligning this item with PL 58. In the current format it is somewhat confusing.	Textron Aviation agrees. Aligned relief with PL-58.
David Burk Aerodox	5/29/25	23-9	70-01-00A	The "C" item is somewhat confusing. For an holder of an Air Carrier or Commercial Operator Certificate the CVR is required for 6 or more passengers.	Remove the "C" relief for item -00A.	Textron Aviation disagrees. The "C" item refers to CRS installed in excess of the 14CFR required number.
David Burk Aerodox	5/29/25	24-1	31-02-00B	MMEL states battery temperature warning system is verified operative, while there is no associated (M) or (O) listed.	Add appropriate (M) or (O) to remarks.	Textron Aviation disagrees. The Battery Temperature Warning system is required for all operations on this aircraft and is part of the preflight checklist. If the warning system is inoperative, the aircraft cannot be dispatched. Removed "Verified" from the proviso.

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David Burk Aerodox	5/29/25	25-2	10-05-07 10-05-08	Remarks currently state, "May be inoperative provided seat remains unoccupied." Should something be said in reference to single pilot operations to be consistent with other similar MMEL items?	Suggest, "May be inoperative provided aircraft is operated single pilot."	Textron Aviation disagrees. There is no requirement for a SIC by cert for this aircraft and the seat can be occupied by a passenger during single pilot operation.
David Burk Aerodox	5/29/25	25-2	20-01	Is there a reason, operating rule, that would require this optional piece of equipment be restricted to 3 calendar-days?	Update to show: D/-/0 with no remarks.	This relief was written in accordance with AD-74-08-09 originally. This item AD may no longer apply to this model.
David Burk Aerodox	5/29/25	25-3	20-02	(Excludes lavatory waste system) in title is somewhat confusing as to why this statement is in the title. The title seems to explain what the relief is for.	Remove (Excludes lavatory waste system).	Textron Aviation agrees. Removed (Excludes lavatory waste system).
David Burk Aerodox	5/29/25	25-8	60-03-02A	Spacing off below item, should have more space.		Added spacing.
David Burk Aerodox	5/29/25	25-8	60-03-03A	Remarks state "EMK" when the relief is for the FAK.	Replace EMK with FAK.	Revised wording.
David Burk Aerodox	5/29/25	30-2	30-03	Proviso c) is somewhat confusing as to what exactly is required per the regulations for this to be inoperative.	It seems the only restriction is for RVSM, so suggest wording be the same as written for the Static Port Heater.	Textron Aviation agrees. Removed 14CFR requirement and added Not operated RVSM.
David Burk Aerodox	5/29/25	31-1	30-03	Currently the MMEL states, "May be inoperative provided device is not required by 14 CFR." Since the FDR is not required for 91 or 135 this is misleading.	Remove "May be inoperative provided device is not required by 14 CFR."	Textron Aviation Agrees. Removed proviso.
David Burk Aerodox	5/29/25	31-1	30-03-01	Currently the MMEL states, "May be inoperative provided device is not required by 14 CFR." Since the ULD is not required for 91 or 135 this is misleading.	Remove "May be inoperative provided device is not required by 14 CFR."	Textron Aviation Agrees. Removed proviso.
David Burk Aerodox	5/29/25	33-1	10-01-00A 10-01-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (Day) and (Night) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Day) and (Night)
David Burk Aerodox	5/29/25	33-1	10-02-00A 10-02-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (Single light failed) and (Both lights failed) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Single light failed) and (Both lights failed)

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David Burk Aerodox	5/29/25	33-2	10-03-00A 10-03-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (Single light failed) and (Both lights failed) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Single light failed) and (Both lights failed)
David Burk Aerodox	5/29/25	33-2	10-05-00A 10-05-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (Single light failed) and (Both lights failed) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Single light failed) and (Both lights failed)
David Burk Aerodox	5/29/25	33-2	10-05-00C	The title is somewhat confusing and not MMEL standard.	Remove the (Right side failed) from title and reword the remarks: "Right side may be inoperative for single-pilot operations."	Textron Aviation agrees. Removed (Right Side failed) and revised proviso.
David Burk Aerodox	5/29/25	33-3	20-04-00A 20-04-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the ((With cabin occupants) and (Without cabin occupants) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (With cabin occupants) and (Without cabin occupants)
David Burk Aerodox	5/29/25	33-3	40-01	Proviso c) is somewhat confusing as to what the requirements are when the Wing Strobe light is inoperative.	Seems proviso c) is taken care of with provisos a) and b) (unless I am missing something), so remove proviso c) or explain what else is required.	Textron Aviation agrees. Removed proviso c)
David Burk Aerodox	5/29/25	33-4	40-03-00A 40-03-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (Single light failed) and (Both lights failed) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Single light failed) and (Both lights failed)
David Burk Aerodox	5/29/25	33-4	40-03-01 40-03-02	Remarks state system is verified operative while there is no associated (O) listed.	Add (O) to remarks.	Textron Aviation disagrees. Removed "Verified" as this is a preflight checklist item and will not require an additional procedure.
David Burk Aerodox	5/29/25	34-1	16-01	Remarks are not in alignment with FAA PL 39.	Update item to align with PL 39.	Textron Aviation agrees. Revised proviso to align with PL 39.
David Burk Aerodox	5/29/25	34-1	18-01-02	MMEL states stick shaker is verified operative, while there is no associated (M) or (O) listed.	Add appropriate (M) or (O) to remarks.	Textron Aviation disagrees. Removed "Verified" as this is a preflight checklist item and will not require an additional procedure.
David Burk Aerodox	5/29/25	34-2	23-01-00A	The title is somewhat confusing and not MMEL standard.	Remove the (Day, VMC) from the title, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Day, VMC)

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David Burk Aerodox	5/29/25	34-3	25-01	MMEL uses the term "Class 3" which does not align with FAA PL 121.	Update remarks per PL 121.	Textron Aviation agrees. Removed "Class 3".
David Burk Aerodox	5/29/25	34-7	25-12	There is an extra line below this item.	Remove the line.	Removed line.
David Burk Aerodox	5/29/25	34-7	31-01	Last proviso does not have a leading letter.	Update to show last proviso as proviso d).	Updated.
David Burk Aerodox	5/29/25	34-7	31-01	Proviso a) states, "Affected system is not on an emergency bus". This can be somewhat confusing to the operators	If there is a Localizer system that is installed on the Emergency Bus, then state which system that would be for, if not remove this statement.	Textron Aviation disagrees. The operator should be aware of which navigation system is on the emergency bus.
David Burk Aerodox	5/29/25	34-8	32-01 34-01	Provisos are somewhat confusing, have both procedures and 14 CFR requirements in the remarks lead to questioning what exactly are the restrictions.	Suggest the following: May be inoperative provided approach procedures do not require its use.	Textron Aviation agrees. Revised proviso as suggested.
David Burk Aerodox	5/29/25	34-9	44-03	Item does not align with PL 54. Some items only reflect class B when they should be for both A and B, Terrain Display for example.	Align with PL 54.	Textron Aviation disagrees. This aircraft is equipped with class B TAWS only.
David Burk Aerodox	5/29/25	34-11	45-01-00A 45-01-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (TCAS not required) and (TCAS required) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (TCAS not required) and (TCAS required).
David Burk Aerodox	5/29/25	34-12	52-01	Other items have removed titles like: Including STCs: ACSS SA02677LA Confusing to leave this one in the MMEL.	Remove "Including STCs: ACSS SA02677LA" See 34-52-02 for example.	Textron Aviation agrees. Removed reference to the STC.
David Burk Aerodox	5/29/25	34-14	52-02	Item not written per PL 105. As currently written it could be inferred there is not relief as ADS-B is required by 14 CFR.	Align with PL 105.	Textron Aviation agrees. Revised to align with PL 105.
David Burk Aerodox	5/29/25	34-16	52-03-00A 52-03-00B	The two titles are somewhat confusing and not MMEL standard.	Remove the (One button failed) and (Both buttons failed) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed (Single button failed) and (Both buttons failed).
David Burk Aerodox	5/29/25	34-16	54-01	Proviso a) states, "Affected system is not on an emergency bus". This can be somewhat confusing to the operators	If there is a VOR system that is installed on the Emergency Bus, then state which system that would be for, if not remove this statement.	Textron Aviation disagrees. The operator should be aware of which navigation system is on the emergency bus.

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David Burk Aerodox	5/29/25	34-16	54-01	Provisos b) and c) are somewhat confusing, have both procedures and 14 CFR requirements in the remarks lead to questioning what exactly are the restrictions.	Suggest the following combining provisos b) and c) with: Enroute or approach procedures do not require its use.	Textron Aviation agrees. Removed proviso "b) Procedures do not require its use."
David Burk Aerodox	5/29/25	34-16	57-01	Provisos a) and b) are somewhat confusing, have both procedures and 14 CFR requirements in the remarks lead to questioning what exactly are the restrictions.	Suggest the following May be inoperative provided enroute or approach procedures do not require its use.	Textron Aviation agrees to discuss this proposal at the FOEB.
David Burk Aerodox	5/29/25	34-17	60-02	Provisos a) and b) are somewhat confusing, have both procedures and 14 CFR requirements in the remarks lead to questioning what exactly are the restrictions.	Suggest the following May be inoperative provided enroute or approach procedures do not require its use.	Textron Aviation agrees to discuss this proposal at the FOEB.
David Burk Aerodox	5/29/25	34-17	60-02-02	Remarks are somewhat confusing as to what the restrictions are.	Reword proviso to explain what the intention of, "database may be not loaded".	TOLD function will not operate without the database loaded. This means the aircraft can be dispatched without the database installed.
David Burk Aerodox	5/29/25	35-1	00-03-03	MMEL states oxygen pressure is verified prior to each flight, while there is no associated (M) or (O) listed.	Add appropriate (M) or (O) to remarks.	Textron Aviation agrees. Added (O).
David Burk Aerodox	5/29/25	35-1	20-01-00A 20-01-00B 20-01-00C	The three titles are somewhat confusing and not MMEL standard.	Remove the (With cabin occupants), (Without cabin occupants), and (Cabin unpressurized) from the titles, the remarks explain when they are and are not required.	Textron Aviation agrees. Removed as suggested.
David Burk Aerodox	5/29/25	35-2	30-01	Relief for Portable Oxygen System is found in items 30-01 and 30-01 on page 35-3.	Delete item on page 35-3, update remarks on page 35-2 to show the current remarks on page 35-3.	Textron Aviation Agrees. Removed double entry.
David Burk Aerodox	5/29/25	38-1	30-04	Subitem numbering seems off, starts at -02.	Start sub item numbering at -01 thru -03.	Textron Aviation Agrees. Renumbered sub items.
David Burk Aerodox	5/29/25	46-1	00-01	Highlights show item updated to FAA PL 121, but MMEL still shows Class notations.	Align with PL 121.	Textron Aviation Agrees. Removed Class from sub items.
David Burk Aerodox	5/29/25	52-3	70-01-01 70-01-02	MMEL states item is verified closed, while there is no associated (O) listed.	Add (O) to remarks.	Textron Aviation agrees. Added (O).
David Burk Aerodox	5/29/25	52-4	70-01-06 70-01-07	Previous page numbering stops at -02, then jumps to -06.	Renumber for consistency.	Textron Aviation Agrees. Renumbered sub items.

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David Burk Aerodox	5/29/25	52-4	70-01-06	MMEL states item is verified closed, while there is no associated (O) listed.	Add (O) to remarks.	Textron Aviation agrees. Added (O).