

FINAL COMMENT LOG

Originating Office: AFS-110		Document Title/Description: MMEL ERJ-170_190 Rev 21, Embraer ERJ-170-100/200, ERJ-190-100/200/300/400, ERJ-190-100 ECJ Commercial Designations: Embraer 170, Embraer 175, Embraer 190, Embraer 195, Embraer 190 Freighter, Embraer 190-E2, Embraer 195-E2, Lineage 1000			POC and Phone Number: Masa Yamazaki, Masanori.Yamazaki@faa.gov		Suspense Date: 09/04/2026
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response	
John J McDermott AFS-220-3 Concur with Comment	5/13/26	VIII	1 st paragraph	1 st paragraph references "Revision 20" and "Any PL either new or revised with an issue date later than 8/21/2024..." Based on the highlights of change more recent policy letters have been applied	Revise to "revision 21" and amend PL issue date reference	Embraer will revise accordingly.	
John J McDermott AFS-220-3 Concur with Comment	5/13/26	Manual	Manual	Several instances of the term "supernumerary" throughout the manual. Notice N8900.743 revises the term "supernumerary" to "authorized persons"	Revise to "authorized persons" if applicable	Due to all current Embraer manuals referencing "supernumerary", Embraer will keep this terminology and address this Notice in future revisions.	
Kevin Johnson AFS 330-121	5/18/26	IV	23-12	Page No. 23-12 should be 23-10 for Item 23-51-03	Change pg. No 23-12 to 23-10	Embraer will revise accordingly.	
Kevin Johnson AFS 330-121	5/18/26	IV	23-12	Page No. 23-12 should be 23-10 for Item 23-51-04	Change pg. No 23-12 to 23-10	Embraer will revise accordingly.	
Kevin Johnson AFS 330-121	5/18/26	IV	23-14	Page No. 23-14 should be 23-12 for Item 23-51-12.	Change pg. No 23-14 to 23-12	Embraer will revise accordingly.	
Kevin Johnson AFS 330-121	5/18/26	V	33-14	Page No. 33-14 should be 33-13 for Item 33-50-30.	Change pg. No 33-14 to 33-13	Embraer will revise accordingly.	
Kevin Johnson AFS 330-121	5/18/26	VIII	PL-025	Policy Letter is out of date	Update PL-025 from revision 23 to revision 24.	Embraer will revise accordingly.	
Kevin Johnson AFS 330-121	5/18/26	Multi	Multi	Throughout this document Extended Range (ER) was changed to Extended-range Twin-engine Operations Performance Standards (ETOPS), these operations are not interchangeable.	Please verify that the changed from "ER" to "ETOPS" is correct.	The change is correct. The E-Jets are approved to conduct ETOPS.	

Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
Kevin Johnson AFS 330-121	5/18/26	21-4	21-25-06	Item 21-25-06 - Inconstancies between No. Installed and Provisos, number installed states 1 installed but in the Provisos section stated "Both" doors and actuators.	Please verify number installed with the number required.	It is correct. There is 1 system installed, which is composed of 2 doors and 2 actuators.
AFS-400				See AFS-400 comment below.		

AFS-410D Gary Medina	5/19/2026	See Comments	See Comments	AFS-410D CNS/SME Review OSS Control Number: 20260507-80384 Subject: ERJ-170/190 MMEL Revision 21 Review Area: CNS-related material...primarily System 23, Communications, and System 34, Navigation. AFS-410D reviewed the CNS-related portions of the draft ERJ-170/190 MMEL Revision 21. AFS-410D has no objections for the CNS portions of the draft MMEL...the generic MMEL relief language used in Systems 23 and 34 appears consistent with normal FAA MMEL drafting practice. Comment 1, Policy Application Record Recommend correcting the FAA MMEL Policy Application Record on Page No. VIII. The draft MMEL is Revision 21...but the Policy Application Record states, "With this MMEL Revision 20." It also states that PLs issued after 08/21/2024 have not been considered, although the record/table appears to include later PLs, including PL-106 Revision 6 (issued 26 June 2025) and PL-138 (issued 21 July 2025), etc. Comment 2, HF Communication System/SATVOICE LRCS Relief Item 23-11-00, High Frequency Communication System, allows HF relief while conducting operations that require two LRCS, provided the aircraft SATVOICE system operates normally, SATVOICE services are available as an LRCS over the intended route of flight, the ICAO flight plan is updated as required, and alternate procedures are established and used. FINAL AFS-410D FYI: For operator implementation, CNS-related MMEL relief should continue to be applied through the operator's MEL procedures, dispatch/flight planning procedures, OpSpecs/LOAs, AFM	Comment 1: Recommended revision: Revise the Policy Application Record to reflect the correct MMEL revision and ensure the PL applicability/cutoff language is consistent with the PLs actually applied in MMEL Revision 21. Comment 2: Recommend confirming that this relief is intended to apply only where the installed SATVOICE system is approved for ATS/LRCS use, including installation in accordance with AC 20-150, and where applicable AIP/regional procedures support SATVOICE use for the intended route or airspace. The relief should not be interpreted as allowing SATVOICE, including portable satellite phones, to substitute for HF voice where an operative HF radio remains required. Recommendation: Confirm Item 23-11-00 is consistent with PL-106 Revision 6 (issued 26 June 2025) and that the associated (O) procedure/DDPM guidance prevents flight dispatch into airspace or on routes where HF voice remains required notwithstanding installed SATVOICE capability.	Embraer will revise accordingly.
----------------------	-----------	--------------	--------------	--	--	----------------------------------

Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
				limitations, applicable 14 CFR requirements, foreign State/AIP requirements, and route/airspace-specific CNS requirements. This is especially important for international, oceanic, remote continental, PBN, CPDLC/ADS-C, SATVOICE, ADS-B, and surveillance-dependent operations. Bottom Line: The AFS-410D review was limited to CNS-related material...primarily System 23, Communications, and System 34, Navigation.		
AFS-800				No comments.		
Public Comment				No comments.		