

FINAL COMMENT LOG

Originating Office: AFS-130		Document Title/Description: MMEL HA-420 Rev 3, Honda Aircraft Company HA-420			POC and Phone Number: Alan Hoffert, alan.hoffert@faa.gov		Suspense Date: 04/17/2026	
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response		
John J McDermott AFS-220-3 Concur with comment	12/1/25	25-4 Pdf 23	25-20-08 Cabinet/ Galley	Format: Item name does not match the item name from previous page.	Suggest revision to "Storage Bins/Cabin, Galley, and Lavatory Storage Compartments/Closets" to match Item name from page 25-3.	Updated to match item name from previous page.		
John J McDermott AFS-220-3 Concur with comment	12/1/25	25-5 Pdf 24	25-40-01 Lavatory Door	Format, Policy Letter 31: Per PL 31 #7 Relief is combined with relief at another location: "Relief combined with ATA 31-XX, (Relief Title), Revision X"	Suggest revision to match PL 31 format guidelines. "Relief combined with 25-20-08, Storage Bins/Cabin, Galley, and Lavatory Storage Compartments/Closets, Revision 3".	Updated as recommended. Remarks column changed to read: "Relief combined with 25-20-08, Storage Bins/Cabin, Galley, and Lavatory Storage Compartments/Closets, Revision 3".		
John J McDermott AFS-220-3 Concur with comment	12/1/25	29-1 Pdf 29	29-00-02 HYD FLUID OVERFILL CAS Message	Format, Policy Letter 31: Per PL 31 #7, Relief is moved to another ATA Chapter: "Relief moved to ATA 31-XX, Revision X". (AFS-220 acknowledges the PL does not directly address moving an item to section 2 of a two-part MMEL).	Suggest revision to match PL 31 format guidelines. "Relief moved to Section 2, Crew Alerting System (CAS) Message Relief, Revision 3".	Updated as recommended. Remarks column changed to read: "Relief moved to Section 2, Crew Alerting System (CAS) Message Relief, Revision 3."		
John Wolfe AFS-330-135	12-4-25	Cover		"FOR 14 CFR PARTS 91, 125, and 135 OPERATIONS ONLY" is used. A Honda HA-420 is not applicable by 14 CFR 125.1(a). Reference QMS Process Work Instructions (QPM) AFS 002-104-W3, A-4.1.2.5.	"FOR 14 CFR PARTS 91 and 135 OPERATIONS ONLY" should be used on the cover page.	Corrected per recommendation. Removed "125".		
John Wolfe AFS-330-135	12-4-25	Cover		Missing FOEB telephone number. Reference QMS Process Work Instructions (QPM) AFS-002-104-W3, A-4. 1.2.8.	Add FOEB telephone number to cover page.	AED is a virtual office with no office number. The email address is monitored and directs correspondence appropriately.		

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John Wolfe AFS-330-135	12-4-25	2-6	CAS MESSAGE- FLAP DEGRADE	This item is incorrectly labeled in the order listed for Dispatch Consideration, "a) Flaps are visually checked for functionality before each flight". Should be listed as d).	Change the item to d).	Corrected to d). AFB-120 to format.
John Wolfe AFS-330-135	12-4-25	2-2	Items 3 and 4	Items 3 and 4 were added to this section with no change bars. Reference QMS Process Work Instructions AFS-002-104-W3, A-3.2.	Add a change bar for items 3 and 4 that were added in this revision.	Request AFB-120 to add change bars. AFB-120 Response: Change bars can't be added to this page. Changes are noted in Log of Revisions and HOC.
John Wolfe AFS-330-135	12-4-25	Many pages		All of the words "the" have been removed as well as the ATA numbers in the Part Two of the Crew Alerting System (CAS) Message Relief Section. These changes are called minor editorial corrections in the Highlights of Change on page III, with no change bars shown. Reference FAA QMS Process Work Instructions AFS-002-104-W3, A-3.2 say this. Change Bars. Any change, addition, deletion, or any minor editorial change in the text or formatting for the current revision is indicated by a vertical bar () in the "Change Bar" column on the far right-hand side. Change bars must be typed, not images or drawings. No other means to reflect changes, additions, or deletions may be used. All change bars applicable to the previous revision (number or letter revision) of the MMEL must be removed prior to the approval of the next revision.	Clarify the policy to account for minor editorial changes with respect to FAA QMS Process Work Instructions AFS-002-104-W3, A-3.2 for change bars.	Change bars appear correct. Added "General" remark in Section Two CAS Messages of highlights of change identifying the deletion of sequence no. column in section two. Change bars reflect the line where sequence numbers had been.

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Brian Crogan AFS-330-135	12/04/25	1-1		The section one Line Replaceable Unit (LRU) Component Relief page was added in this revision, however, was never mentioned in the Highlights of Change page. (Page III). Reference FAA QMS Process Work Instructions AFS-002-104-W3, A – 4.4	Update the highlights of change page with the applicable changes.	Added Page: Line Replaceable Unit (LRU) Component Relief to Highlights of Change section.
Brian Crogan AFS-330-135	12/04/25	I	SYS No 25	On the table of contents and control page for system # 25 it lists page no 25-1 thru 5 where revision 3 has 6 pages to 25.	Update page no reference to 25-1 thru 6.	Corrected by AFB-120.
Brian Crogan AFS-330-135	12/04/25	I	SYS No 31	On the table of contents and control page for system # 31 it lists page no 31-2 thru 4 where it should be 31-1 thru 4	Update page no reference to 31-1 thru 4.	Corrected by AFB-120.
Brian Crogan AFS-330-135	12/05/25	21-2	21-33-01	Notes 1, 2, & 3 were added, however the highlights of change page does not show they were added. Reference FAA QMS Process Work Instructions AFS-002-104-W3, A – 4.4	Update the highlights of change page with the applicable changes.	Highlights of change page updated to reflect the added notes.
Brian Crogan AFS-330-135	12/05/25	22—1	22-30-01	A note was added, however, the highlights of change page does not show it was added. Reference FAA QMS Process Work Instructions AFS-002-104-W3, A – 4.4	Update the highlights of change page with the applicable changes.	Highlights of change page updated to reflect the added note.
Brian Crogan AFS-330-135	12/05/25	23-4	23-50-09	The highlights of change page states 23-50-09: Updated No. Installed. However, 23-50-09 was never updated and is the same as Rev 2.	Update 23-50-09 with the number of installed.	Updated number installed.
Brian Crogan AFS-330-135	12/05/25	33-1	33-30-01	The highlights of change page states Updated No. required for dispatch. However, the No Installed was updated from – to 2.	Need to determine if the highlights of change page is incorrect or 33-30-01 is incorrect and update accordingly.	Corrected highlights of change page to reflect number installed.
Brian Crogan AFS-330-135	12/05/25	34-6	34-52-03	In Rev 2, 34-52-03 was moved to item 34-52-04. However, in Rev 3 34-52-04 disappeared due to the alignment of numbering. This should be mentioned in the highlights of change page since 34-52-04 is no longer in the MMEL. (Can be confusing).	Update the highlights of change showing this change.	Updated highlights of change page to reflect Item 34-52-04 is no longer in the MMEL due to the alignment of numbering.

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Brian Crogan AFS-330-135	12/05/25	35-1	34-20-01	In the Remarks or Exceptions column the lettering appears off. It shows d), e), f). Rev 2 has it as a), b), c).	Update to a), b), c) unless d), e), f) was the intent.	Corrected by AFB-120.
Brian Crogan AFS-330-135	12/05/25	VI	2-2	On the highlights of change page, page No 2-2 states "Added CABIN ALT HOLD". However, on page 2-2 which is the statement page does not discuss Cabin Alt Hold. Items 3 & 4 were added.	Update the highlights of change page to show the addition of items 3 & 4 and remove the CABIN ALT HOLD comment.	Updated highlights of change to reflect items 3 and 4 were added.
Brian Crogan AFS-330-135	12/05/25	VI	2-3	The Highlights of Change page, Page No. 2-3, does not incorporate the change of Adding the CABIN ALT HOLD item. This item was listed for Page No 2-2 (See the comment above this one).	Update the explanation of change section for Page No 2-3 by incorporating the CABIN ALT HOLD comment on the Highlights of Change page.	Corrected. Added CABIN ALT HOLD to the Highlights of Change page.
Brian Crogan AFS-330-135	12/05/25	VI	2-8	The Highlights of Change page, for Page No. 2-8, does not incorporate the (O) Procedure and note added in the Dispatch Consideration column for the Windshear Fail.	Update the explanation of change section for Page No 2-8 by adding a comment on the Highlights of Change page of what was added for the Windshear Fail.	Added (O) procedure and note in Dispatch Consideration column for WINDSHEAR FAIL, to the Highlights of Change page.
AFS-400				No comments.		
AFS-800				No comments.		
Public Comment						
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	1		MMEL states this MMEL is applicable to Part 125, not sure this aircraft could be operated part 125.	Update cover page to show only Parts 91 and 135.	Corrected, see above.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	23-1	23-12-01	Remarks while they do match PL 95 do not comply with the Policy Statement, "It should be customized, as appropriate, for each airplane type."	Suggest updating remarks to the following: Any in excess of those required by 14 CFR may be inoperative provided Com 1 is operative. NOTE: "COM 1 (2) TEMP HIGH" CAS message may be displayed.	Revised remarks to incorporate the recommendation.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	23-1	23-20-01 23-20-02 23-20-03	All three of these items have what is normally written for category "D" items. Normal category "C" item relief is not incorporated, "Alternate procedures are established and used".	Change these three to repair category "D" and add a separate repair category "C" item with the wording, "May be inoperative provided alternate procedures are established and used."	No changes at this time. Maintain manufacture category and remarks.

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David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	23-2	23-40-02	Since PA is not required by 14 CFR parts 91 nor 135, so proviso a) is not needed.	Remove proviso a) Reword to: May be inoperative provided alternate, normal, and emergency procedures and/or operating restrictions are established and used.	Revised to incorporate the comment and recommendation.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	23-2	23-40-03	Since Interphone is not required by 14 CFR parts 91 nor 135, so proviso a) is not needed.	Remove proviso a) Reword to: May be inoperative provided alternate, normal, and emergency procedures and/or operating restrictions are established and used.	Revised to incorporate the comment and recommendation.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	23-2 23-3 23-4	23-50-01 thru 23-50-09	Current formatting of these items is very confusing as to what the relief is for. They should all be under the same basic MMEL item number with sub item numbers for each subitem.	Reformat these items to align with MMEL Policy Letter (PL) 58, Revision 4 GC.	Aligned with MMEL Policy Letter (PL) 58. Line-item sequence numbers revised to meet PL-58.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	24-1	24-00-01	Currently this is shown as a category "C" item, but as optional, repair category seems overly restrictive.	Update to show repair category of "D".	Non-concur. Honda Aircraft recommendation is for category "C". Some USB charging outlets are in the cockpit and may power portable Electronic Flight Bags.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	25-1	25-10-02 25-10-03	There are no restrictions noted to ensure single pilot operations are not conducted.	Suggest added, "For single pilot operations to first line: "For single pilot operations, Co-pilot seat may be inoperative provided:"	Revised to incorporate the comment and recommendation.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	25-2	25-20-02	Is there an AFM or other requirement for having at least one on each side operative? Seems overly restrictive for optional equipment.	Update number required to 0 and remove remarks.	Non-concur. In the event of an emergency, it may be necessary to assess the outside conditions prior to opening any exit.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	25-3	25-20-08	First, is this relief even applicable to this aircraft? Seems the PL was just cut and pasted into the MMEL without any editing to accommodate this aircraft configuration. Also, the "(cont'd) title on page 25-4 does not match the title on page 25-3.	Update remarks/titles as applicable.	Maintained the Policy letter wording. As noted earlier, the title was updated on page 25-4 to match the title on page 25-3.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	25-5	25-30-01	A Coffee Maker would normally be listed in an operator's NEF, not as a MMEL item.	Remove this item from the MMEL.	Non-concur. Not all operators have a NEF program.

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David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	ATA 30		Many items in the MMEL have an (O) when the term, AFM-defined icing conditions is listed, while others do not. For example, 30-10-02 does not, while 30-10-04 does.	Either add (O) to all items with this restriction or remove the (O) for consistency.	Comment considered and adjustments made on some of the items. "O" procedure required when provisos use terms of "verified" or "Alternate means".
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	31-1	31-30-01	Since FDR is not required by 14 CFR Parts 91 nor 135 for this aircraft the "A" repair category relief is not applicable.	Remove the "A" category relief. This would cause the relief for either Holders or non holders to be the same. May be inoperative. NOTE: "CVR FAIL" and/or "FDR FAIL" CAS message may be displayed.	Concur that the FDR is not required by 14 CFR for this aircraft. Changed remarks to "May be inoperative"
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	31-2	31-30-02	Seems CVR should be in ATA 23. Also, CVR is not required by 14 CFR Parts 91 nor 135 for this aircraft the "A" repair category relief is not applicable.	Update remarks to: May be inoperative. NOTE: "CVR FAIL CAS" message may be displayed.	CVR is required for aircraft, 14 CFR Part 135.151(a). Aircraft configured for up to 6 passenger seats. Moved CVR relief to ATA 23, 70-01.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	33-2	33-41-01	Since the relief for C/2/0 and C/2/1 are the same seems the relief could be just one item.	Update to show: C/2/0 May be inoperative provided aircraft is not operated between sunset and sunrise.	Revised remarks and exceptions relief for C/2/1 to allow one landing light to be inoperative provided taxi lights are operative.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	34-2 34-3	34-44-02 34-44-03	Title is not according to PL 54, PL shows equipment required, not installed.	Reformat item to align more with PL 54.	The items were deleted in Revision 2. No relief requested by Honda Aircraft.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	34-3	34-45-01	Since TCAS is not required for this aircraft, the "B" relief is not applicable.	Remove the "B" relief and reword the "C" relief to state: (M) May be inoperative provided: a) System is deactivated and secured, and b) Enroute or approach procedures do not require its use. Remove the MMEL number for TCAS II.	Removed the "B" since this aircraft is 7 seats or less. Not required by 14 CFR Part 135.180 or Part 91. Removed the MMEL number for TCAS II.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	34-3	34-45-01 (second item) thru 34-45-05	MMEL format shows these as separate equipment items, very confusing.	Update format of TCAS I and II to align with PL 32.	Aligned with MMEL Policy Letter (PL) 32. Line-item sequence numbers revised to meet PL-58.

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David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	34-5	34-52-02	Per PL 76, the Elementary and Enhanced Downlink Aircraft Reportable Parameters should be part of the Transponder item, not a separate MMEL item.	Align item with PL 76.	Aligned the item with Policy Letter 76, to include removing the (O) procedure.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	34-9	34-52-05	This item is a repeat of the Transponder item.	Remove item 34-52-05 as this is covered in 34-52-01, "ATC Transponder and Altitude Reporting System."	Item 34-52-05 deleted this revision and adjusted remarks to identify it was a duplicated entry. Removed (O) procedure from 34-52-01 to align with Policy Letter 76.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	35-1	35-10-03	There are no restrictions noted to ensure single pilot operations are not conducted.	Suggest the following: May be inoperative provided: a) Aircraft is not operated single pilot, and Co-pilot seat is not occupied and seat is placarded "DO NOT OCCUPY".	Comment and recommendation is not accepted. With the co-pilot oxygen mask inoperative, the aircraft can only be operated by a single pilot. Adjusted remark to reflect single pilot operations.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	35-1	35-20-01	Typo, provisos start at d).	Update proviso lettering.	Corrected by AFB-120.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	ATA 36		Same comment as noted in ATA 30 in reference to AFM.	Same comment as in ATA 30.	The "O" items are correct for ATA 36.
David Burk Aerodox, Inc. dburk@aerodox.com	01/02/26	52-1	52-10-01 52-30-01 52-30-02	All three of these items require a "verification" of the door closed, there are no (O) symbols to indicate how this would be accomplished.	Add an (O).	Added (O) to the identified items in the remarks and exceptions column.