

FINAL COMMENT LOG

| Originating Office: AFS-130 | | Document Title/Description: MMEL PC-12/47E Rev 6, Pilatus Aircraft Ltd. PC-12/47E | | | POC and Phone Number: Alan Hoffert, alan.hoffert@faa.gov | | Suspense Date: 04/13/2026 |
|---|-------------|---|---|---|---|--|-------------------------------------|
| Commenter Name and Organization | Date | Page # | Line, Para, or Item # | Comment | Recommendation | Response | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 23-2 Pdf 24 | 23-6-C Rudder | NO Installed indicates 3, No required for dispatch indicates 1, but the remarks indicate only 1 may be inoperative or missing. | Amend No Required to 2 assuming remarks are correct. | Updated remarks to read "One or two may be inoperative or missing." | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 25-8 Pdf 39 | 25-17 Portable Flashlights/F lashlight holders | Format: Dashes (-) missing from column 2 and 3. | Insert dashes. | Added dashes (-) to column 2 and 3. | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 25-8 Pdf 39 | 25-17 A Tamper Seals or Tags | Format: Dashes (-) missing from column 2 and 3. | Insert dashes. | Added dashes (-) to column 2 and 3. | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 77-1 Pdf 85 | 77-1 Engine Trend Condition and Monitoring System | Policy: PL 31 #7 Relief is combined with relief at another location: "Relief combined with ATA 31-XX, (Relief Title), Revision X." It appears this item has been combined with item 45-2. | Amend remark to conform to PL 31 "Relief combined with ATA 45-2 Aircraft Condition and Monitoring System (ACMS)(including Engine Trend Condition and Monitoring System) Revision 6. | Recommendation incorporated. | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 2-3 to 2-10 | | Policy: PL 31: It appears most items from Section 2 reference deleted, when in fact they were moved or combined with different items in section 1. | Apply PL 31 # 7 where appropriate. | Corrected. | |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 27-1 Pdf 41 | 27-2 Triple Trim Indication (MFD) | Policy: PL 31 #7 Relief is combined with relief at another location: "Relief combined with ATA 31-XX, (Relief Title), Revision X." It appears this item has been combined with items 23-4 through 6. | Amend remark to conform to PL 31 "Relief combined with ATA 23-4...5...6 Relief title, revision X". | Amended remark to conform to PL-31. There was an incorrect ATA reference. Corrected to ATA 27-4...-5...-6. | |

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| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 31-3 Pdf 48 | 31-7 Lightweight Data Recorder | Policy: PL 31 #7 Relief is combined with relief at another location: "Relief combined with ATA 31-XX, (Relief Title), Revision X." It appears this item has been combined with item 31-4. | Amend remark to conform to PL 31 "Relief combined with ATA 31-4 FDR System Revision 6. | Amended remark to conform to PL-31. Revised Item title on 31-4 to spell out acronym. |
| John J McDermott AFS-220-3 Concur with Comment | 12/15/25 | 35-1 Pdf 69 | 35-3 External Oxygen Pressure Gauge | Policy: PL 31 #7 Relief is combined with relief at another location: "Relief combined with ATA 31-XX, (Relief Title), Revision X." It appears this item has been combined with item 35-4. | Amend remark to conform to PL 31 "Relief combined with ATA 35-4 Flight Crew Fixed Oxygen System Revision 6. | Amended remark to conform to PL-31. |
| AFS-300 | | | | No comments. | | |
| Timothy Harris, AFS-410E | 12/18/25 | 32-1 | 32.2 | Same deferral calls the system ABS and anti-skid. Suggest staying consistent and if needed defining what ABS means. | | Wording changed from "ABS" to "Anti-skid" in proviso c). |
| Timothy Harris, AFS-410E | 12/18/25 | 33-1 | 33.1. | First use of the acronym NVG. Suggest defining. | | Defined acronym: Night Vision Goggle. |
| Timothy Harris, AFS-410E | 12/18/25 | 33-2 | 33.5 | Requires position lights at night- | suggest changing to May be inoperative for other than night operations. | Incorporated the wording, "May be inoperative for other than night operations." |
| Timothy Harris, AFS-410E | 12/18/25 | 34-11 | 34.13 | Policy Letter 32 has a category C option for TCAS I as well as the B. Is this left off the MMEL on purpose? (In consultation with TCAS SME). | | Added category C option for TCAS I. (Updated page # and item # for this row). |
| David Reaves AFS-830 717-712-1035 | 12/17/25 | 25-3 | 25.9 | Emergency Med Kit listed as Category A with no repair interval. | Change to Category D per PL-132. | Changed to Category D. |
| Public Comment | | | | | | |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | | | General comment: Sub item format does not seem to align with normal MMEL formatting. Normally the symbol for subitems is a 1), 2), etc. Currently this MMEL uses, A), B), etc. | Update subitem numbering to align with PL 31 and 89001. V19, Section 5, Chapter 5. | No change in sub item format at this time. Reason is to maintain previous revision format, that is also used in the current MMEL PC-12 and MMEL PC-12/47G. |

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| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 21-1 | 21.1 A) | This item seems to be a separate MMEL item and not a subitem of the Air Cycle Machine. | Assign Fresh Air Ventilation Outlets its own MMEL item number. | Move "Fresh Air Ventilation Outlets" to 21-14. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 23-2 | 2306 | Current relief states, "May be inoperative provided no communication equipment is required for the flight", is this even possible? When would you be able to fly the aircraft not need to have any communication equipment required? | Remove the first line. Just leave the title for use with sub items. | Non-concur. Flying VFR from a non-controlled airport to another non-controlled airport would not require communications. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 23-2 | 23.7 | PA is not required for this size aircraft with either part 91 or part 135, so the "B" relief is not applicable. | Remove the "B" relief item. Reword the "C" item to just say: (O) May be inoperative provided alternate, normal, and emergency procedures, and/or operating restrictions are established and used. NOTE: Any station function(s) that operate normally may be used. | Change "B" repair category to a "C". Deleted second proviso. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 23-3 | 23.8 | Since this aircraft is not a ETOPS capable aircraft, the "Non ETOPS" wording is not applicable. | Remove this "Non ETOPS" wording. | No change. Maintain verbiage from Policy Letter 106 Rev 6. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 23-4 | 23.8 | Since this aircraft is not a ETOPS capable aircraft, the "Non ETOPS" wording is not applicable. | Remove this "Non ETOPS" wording. | No change. Maintain verbiage from Policy Letter 106 Rev 6. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 25-3 | 25.9 | Since the EMK is not required for this size aircraft with either part 91 or part 135, so the "A" repair category is not applicable. | Update repair category to "D". | Changed to Category D. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 27-1 | 27.2 | Seems to be a typo, "Deleted, Revision 6. (Included in items <u>23-4 thru 6</u>). | Update to show 27-4 thru 6. | Amended remark to conform to PL-31. There was an incorrect ATA reference. Corrected to ATA 27-4...-5...-6. (See above). |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 28-1 | 28.1 | Relief for the FQ is indicating only for "Analogue" systems. I believe the 47E has MFDs, so the term "Analogue" does not seem accurate. | Remove the term (Analogue). | Non-concur. |

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| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 28-1 | 28.2 | Same comment as above, "Analogue" does not seem accurate. | Remove the term (Analogue). | Non-concur. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 31-2 | 31.4 | Seems the term LDR is noted as also a CVFDR, proviso's don't align with this term. Proviso a) says the CVR operates normally, but if this is a combined unit, then that might not be possible. | Reword to show CVR functions are required, not the CVR. Similar comment on using FDR in the provisos. Title could also be more aligned with PL 87 for clarity. | Revised 31.4. Since there is no 14 CFR requirement for a CVR or FDR for this single engine aircraft. I have deleted reference to Air Carrier vs Non-Air Carrier. Revised remarks to "May be inoperative." Policy Letter 87 is not applicable. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 31-3 | 31.4 | Relief for operators other than certificate holders seems to indicate that one FDR is required by regulations. | Update remarks to more align with PL 87. | Revised 31.4. See above. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 32-1 | 32.1 | Remarks do not align with normal MMEL remarks. Does not state if item can be inoperative. | Update remarks to something like this: (O) May be inoperative provided alternate procedures are used to prevent aircraft movement. | Concur. Revised remarks. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 33-1 | 33.1 | Proviso a) is not per PL 77 and could cause confusion on what is required. | Remove proviso a) to align with PL 77. | Non-Concur. OEM may be more conservative (restrictive) than the policy letter. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 33-2 | 33.5 | Currently relief states, "May be inoperative provided system is not required by 14 CFR." This is somewhat open to interpretation and does not align with other position light relief found in other MMELs. | Update remarks to state: May be inoperative for other than night operations. | Concur updated remark. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 34-7 | 34.4 | Relief for Mode S should be covered with the ATC relief. Relief as written more aligns with EASA than with FAA terminology | Remove item 34.4. | Relief combined with 34-3. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 34-7 | 34.5 | First line, "Navigation Equipment" seems to be more of a generic title than one that would have relief. | Update to remove the "C/-/- and remarks for the "Navigation Equipment" line. | Non-concur. Other items not listed may qualify. |

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| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 34-8 | 34.6 | Since a class B TAWS is required, then the repair category should match that MMEL item, which is a "A". | Update to show "A" with same restrictions as TAWS. | Non concur. "A" repair category here requires additional provisos be added. Those provisos are listed in the TAWS section. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 34-11 | 34.13 | TCAS is not required for this size aircraft either part 91 or part 135, so the "B" repair category is not applicable. | Remove the "B" relief for TCAS and keep only the "C" item with proviso a) removed. | Concur. Replaced repair category "B" with a "C". The proviso "Not required by 14 CFR" is removed. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 34-13 | 34.14 | TAWS Class A is not required for this size aircraft either part 91 or part 135, so this set of relief is not applicable. | Remove the Class A required. | Non-concur. The Pilatus PC-12/47E has the option for TAWS Class A. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 35-1 | 35.2 | Proviso for second item seems incomplete. | Rewrite remarks to explain when and what is needed if not required by 14 CFR or remove this subitem. | Non-concur. |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 38-1 | 38.1 | Subtitle "(Including Wheelchair Accessible Lavatories) is not applicable. | Remove the parenthetical text. | Removed "(Including Wheelchair Accessible Lavatories)". |
| David Burk Aerodox, Inc. dburk@aerodox.com | 01/19/26 | 46-5 | 46.4 H) | Proviso c) uses the non-normal word, "functional" instead of the common "is operative". | Replace "functional" with "is operative". | 46.4, C), D), E), F), G) and H). Replaced word "functional" with "operative". |