FINAL COMMENT LOG

Originating Office:	Document Title/Description:	POC and Phone Number:	Suspense Date:
AFS-130	MMEL PC-12 Rev 5, Pilatus Aircraft Ltd. PC-12	Alan Hoffert, (614) 619-4312	08/26/2025

Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
John J McDermott AFS-220-3 Concur with Comment	4/8/25	21-1 Pdf 13	21-1 Environment al Control System	Typo: "a)" listed in "sequence no." column.	Remove "a)" to match rest of format.	Corrected by AFB-120.
John J McDermott AFS-220-3 Concur with comment	4/8/25	22-1 Pdf 16	22 Autopilot	Clarification: Various language used throughout the "autopilot" section is confusing. For example, 22-2, 22-3, 22-4 say "autopilot is not used", whereas 22-5, 22-9 use that language with "refer to 22-1". 22-7 says "is considered inoperative, refer to 22-1" The variation in language may lead the user to believe 22-1 may or may not need to be MEL'd in conjunction with the other item.	Suggest clarifying language be inserted when the intent is to defer 22-1 in conjunction with another item. "Refer to 22-1" may lead users to believe the remarks or exceptions in 22-1 need to be followed when deferring another item.	"Refer to item 22-1" was deleted on items stating, "is not used". Reference MMEL definition, "is not used". "Refer to item 22-1" is retained on items stating, "considered inoperative". Which requires the referenced item to be treated as though it was inoperative. Reference MMEL definition "Considered Inoperative".
John J McDermott AFS-220-3 Concur with comment	4/8/25	23-3 Pdf 20	23-7 A-B Static Wicks	Inconsistencies between a) and b). "a)" has no category, and "b)" has no category, no installed, or no required for dispatch.	Add or remove info as appropriate.	Added the category, no. installed, and number required for dispatch. For 23-7 a) and b).
John J McDermott AFS-220-3 Concur with comment	4/8/25	23-3 Pdf 20	23-7 A-B 4 Static Wicks Stinger	Typo? "Stinger" lists NO Installed as 1 and NO Required as 1.	Remove "stinger" if unable to MEL.	Deleted due to no relief.
John J McDermott AFS-220-3 Concur with comment	4/9/25	23-4 Pdf 21	23-8b Cargo Configuratio n	Per N8900.669 (expired) "supernumeraries" are now "authorized persons" FYI updated Notice is in publication.	Revise to "authorized persons".	Revised to "Authorized Persons" and removed "Supernumerary".
John J McDermott AFS-220-3 Concur with comment	4/9/25	23-5 Pdf 22	23-14 Datalink	Typo: "D" category misaligned.	Revise alignment.	Corrected by AFB-120.
John J McDermott AFS-220-3 Concur with comment	4/9/25	25-2 Pdf 26	25-3 NEF	Typo: "-" missing from category.	Revise with "-".	Added "-" in category column.

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John J McDermott AFS-220-3 Concur with comment	4/9/25	27-1 Pdf 35	27-3 Aileron Trim	Typo: "(" missing from the maintenance procedure in column 4.	Revise with "(".	Corrected by AFB-120.
John J McDermott AFS-220-3 Regulatory Non-concur	4/9/25	28-1 Pdf 36	28-1 Fuel Quantity Indicator	Regulatory: "B/2/0" that allows no operable fuel quantity gauge is contrary to regulation 91.205 b9 which states "Visual-flight rules (day). For VFR flight during the day, the following instruments and equipment are required: Fuel gauge indicating the quantity of fuel in each tank.".	Revise or remove item.	Revised to reflect one fuel quantity indicator is required for dispatch. This matches the relief given to other similar aircraft.
John J McDermott AFS-220-3 Concur with comment	4/9/25	31-2 Pdf 39	31-6	Typo: Item name missing.	Revise with item name.	The reason for deleting 31-6 is that the Item name was missing on revision 4. Not able to accurately determine the item.
AFS-300				No comments.		
AFS-800				No comments.		
Lonnie L. Woodman AFG-500	4/30/25	General		I was wondering if Policy Letter PL-54 Rev 10 has been incorporated into MMEL PC-12 rev 4.		Updated MMEL to match wording in PL-54 Rev 10.
Public Comment						
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25			General Comment: Delete the word "The" when the proviso starts with, "The", this is per FAA PL 31 R3, item 17. Example is found on page 21-1, 21.3.	Delete "The" where appropriate.	Deleted the word "The" whenever possible.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	V	1 st Paragraph	MMEL states: The Definitions must be inserted here in each Minimum Equipment List (MEL) from current FAA MMEL Policy Letter PL-25, MMEL and MEL Definitions. This leads some to understand that the MMEL must be the place where the definitions must be placed. Very difficult for operators to accomplish this.	Suggest the following wording: Refer to the current FAA MMEL Policy Letter (PL) 25, MMEL and MEL Definitions, found on the FAA Dynamic Regulatory System (DRS) website at https://drs.faa.gov .	Added the wording: "Refer to the current FAA MMEL Policy Letter (PL) 25, MMEL and MEL Definitions, found on the FAA Dynamic Regulatory System (DRS) website at https://drs.faa.gov. "

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	>	1 st Paragraph	MMEL states: The applicable Preamble must be inserted here in each Minimum Equipment List (MEL) from current FAA MMEL Policy Letter PL-34, MMEL and MEL PREAMBLE, or current FAA Policy Letter PL-36, FAR Part 91 MEL Approval & Preamble, for Part 91 MEL approvals. This leads some to understand that the MMEL must be the place where the Preamble must be placed. Very difficult for operators to accomplish this.	Suggest the following wording: For operations under 14 CFR parts 91 subpart K (part 91K), 121, 125, 125 LODA, 129, and 135, refer to the current FAA MMEL PL-34, MMEL and MEL Preamble. For operations under 14 CFR part 91, refer to current FAA MMEL PL-36, 14 CFR Part 91 MEL Approval and Preamble. Both Policy Letters are found on the FAA Dynamic Regulatory System (DRS) website at https://drs.faa.gov .	Added the wording: "For operations under 14 CFR parts 91 subpart K (part 91K), 121, 125, 125 LODA, 129, and 135, refer to the current FAA MMEL PL-34, MMEL and MEL Preamble. For operations under 14 CFR part 91, refer to current FAA MMEL PL-36, 14 CFR Part 91 MEL Approval and Preamble. Both Policy Letters are found on the FAA Dynamic Regulatory System (DRS) website at https://drs.faa.gov ."
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-1	21.1 A)	Title is missing, as currently written it is assumed this item is part of the Environmental Control System (ECS), which it is not.	Renumber MMEL item to show this is not part of the Environmental Control System (ECS). Correct title should be: Fresh air ventilation outlets. Title comes from the EASA MMEL.	Added item title: "Fresh Air Ventilation Outlets".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-1	21.7	Remarks state: May be inoperative provided flight is conducted below 10,000 ft. MSL, MEA and MOCA allowing. This is not standard per FAA PL 31. Question, why on just a few of the items like this are the statements, "MEA and MOCA allowing", while other items do not have this statement?	To align with PL and standardize the wording in this MMEL, suggest the following: May be inoperative provided flight is conducted at or below 10,000 ft. MSL, MEA and MOCA allowing. For consistency, remove the "MEA and MOCA allowing" statements, or add to all other applicable items.	Corrected wording to, "May be inoperative provided flight is conducted at or below 10,000 ft. MSL."
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-2	21.14	Remarks state: May be inoperative provided the flight is not conducted above 10,000 ft. MSL.	To align with PL and standardize the wording in this MMEL, suggest the following: May be inoperative provided flight is conducted at or below 10,000 ft. MSL.	Corrected remarks to, "May be inoperative provided flight is conducted at or below 10,000 ft. MSL."
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-2	21.16	Remarks state: May be inoperative provided flight is conducted below 10,000 ft. MSL, MEA and MOCA allowing. This is not standard per FAA PL 31.	To align with PL and standardize the wording in this MMEL, suggest the following: May be inoperative provided flight is conducted at or below 10,000 ft. MSL, MEA and MOCA allowing.	Corrected remarks to, "May be inoperative provided flight is conducted at or below 10,000 ft. MSL."

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-2	21.17	Remarks do not comply with standard MMEL wording. 21.15, the second item more aligns with standard wording for multiple remarks. This item has an (M) while other unpressurized items do not. Is there a particular reason for this?	Update MMEL to state: May be inoperative provided: a) Aircraft is operated in an unpressurized configuration, and b) Aircraft is operated at or below 10,000 ft. MSL. (M) removed for standardization if not required for only this one item.	Updated Proviso to: (M)(O) May be inoperative provided: a) Flight is conducted unpressurised, b) ECS EMERGENCY SHUT OFF LEVER is pulled, and c) Flight is conducted at or below 10,000 ft. MSL. Aligns with EASA MMEL as revised.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	21-3	21.23	MMEL states, "May be inoperative." This is not standard throughout the MMEL.	For standardization, either add, "May be inoperative" or all blank items, or remove "May be inoperative" when the sentence stands alone.	"May be inoperative." Added to 21-20, 21-21, 21-22 for consistency. Corrections made throughout the document.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	22-1	22.5	MMEL states: May be inoperative provided autopilot is not used (Refer to item 22-1).	In some cases, 22.4 for example, the ((Refer to item 22-1) is not included. For standardization, either add the additional references, or remove these type of remarks.	"Refer to item 22-1" was deleted on items stating, "is not used". Reference MMEL definition, "is not used" "Refer to item 22-1" is retained on items stating, "considered inoperative". Which requires the referenced item to be treated as though it was inoperative. Reference MMEL definition "Considered Inoperative".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-1	23.2	Just stating, "As required by 14 CFR" makes it somewhat difficult to address in an MEL. Different inspectors interpret this differently.	Suggest matching the wording from the PC-12/47E MMEL: May be inoperative provided: a) One headset is operative and used by each flight crewmember, and b) A spare operative headset is readily available in the flightcrew compartment.	Updated remarks for consistency with other MMEL for PC-12/47E. This remark is appropriate to the legacy PC-12 models.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-1	23.5	Item is not written per FAA PL 58 and very confusing as written. As written MMEL is more referring to the relief for a CVR and not the Boom Microphone.	Update MMEL to comply with FAA PL 58.	Updated to comply with PL-58. Deleted line items dealing with CVR, which is addressed in 23.9.

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-3	23.7 a)	Missing repair category, and remarks are very confusing. Are there cases where no communication equipment is required? The note adjacent to 6), seems to be written only for this sub item, looking at the EASA MMEL it should be applied to each item.	Remove the number installed, number required, and remarks adjacent to the a). Suggest looking at the EASA MMEL and replacing the blank remarks with the EASA remarks. This will address the note issue.	Updated remarks for clarification.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-3	23.7 b)	As with a), remarks are incorrect.	Remove the remarks, or review the EASA MMEL for wording.	Updated remarks for clarification.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-4	23.8 a)	MMEL item has two sets of remarks, the "B" item is not applicable as the PA is not required by 14 CFR for this aircraft.	Keep the current "B" relief, but change the repair category to "C" as PA is not required by 14 CFR for this aircraft. Remove the "C" relief.	Recommended changes accepted and updated.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-4	23.9	MMEL does not address the relief for Part 91 operators, currently only 135 operations.	Add relief from PL 29 for operators other than a holder of an air carrier or commercial operator certificate.	Added relief for operators other than a holder of management specifications, air carrier, or commercial operator certificate.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-5	23.11	First set of provisos, repair category does not match PL 58.	Update to show a "D" repair category.	Updated to reflect PL-58.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	23-5	23.14	Wording has an "that" that does not seem to be correct per standard wording.	Update remarks to: May be inoperative provided procedures do not require its use.	Removed the word "that".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	24-1	24.3	Since numerous revisions have been complied with, keeping this item in the MMEL does not accomplish much.	Per PL 31, The item name, sequence number and notations may be deleted from the MMEL/MEL with the next numbered revision provided permanent documentation of this change is retained by the AEG. Suggest removing this MMEL item.	Item 24.3 removed and sequenced the numbers.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	24-2	24.6	Currently MMEL states, "One may be inoperative provided autopilot is not required by 14 CFR." This causes some confusion as to when the AP is required. Note 2 takes care of the regulatory requirement. This does not also align with the basic AP relief found in 22.1.	Update to state: One may be inoperative provided: a) AFM limitations are observed, b) Operations do not depend on its use, and c) The flight is conducted under VFR for single pilot operations. NOTE: Autopilot may be used.	No change. The current relief continues to align with EASA's MMEL Revision 9.

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-3	25.4 b)	Formatting issue, second "A" item, there are two dashes between calendar and days.	Correct typo.	Corrected by AFB-120.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-5	25.6	Category "A" item is not applicable for this aircraft. Only 121 operations require more than one FAK.	Remove the "A" item.	Removed due to rule requirement for this size aircraft.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-5	25.8	Since the remarks state the seat must be secured, an (M) would be appropriate for this item to show how the seat should be secured.	Add (M) to remarks.	Added (M) and updated remarks.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-5	25.9	Since the remarks state the seat must be secured, an (M) would be appropriate for this item to show how the seat should be secured.	Add (M) to remarks.	Added (M) and updated remarks.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-6	25.10	Item does not align with PL 104. One example is the title, PL no longer shows "Overhead".	Align with PL 104 where applicable.	Updated to align with Policy Letter 104.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	25-8	25.13	Currently MMEL has a "dash" for number required, since only one is installed, number required should be 0.	Update number required to 0.	Updated number required to "0".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	27-1	27.1	Proviso a) states, "each flight", while proviso b) states, "each takeoff". Is there a specific reason for the difference?	Suggest changing both to "each flight" to align with PL 25 definitions. This is also found in 27.4. 27.5 uses departure. There are several other items where "departure" is used, suggest changing all to match so as to avoid confusion.	Changed terms "each flight" and "each departure" to "each takeoff". Takeoff is identified in the definitions.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	28-1	28.2	Item has an (O) but remarks state, "operate normally". Per definitions, an (O) would not be required.	Remove the (O), or change to "verified operative".	Removed the (O) requirement.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	28-1	28.3	Item has an (O) but remarks state, "operate normally". Per definitions, an (O) would not be required.	Remove the (O), or change to "verified operative".	Removed the (O) requirement.

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	30-1	30.5	Seems the Pitot heat is accounted for in item 30.4.	Suggest renaming item to Static Heat, and remove the B/2/0 item.	Revised 30.4 with title, repair category change and additional remarks to match similar single engine turbo prop MMELs. Revised 30.5 title, added (O) due to verified operative requirement. Remove B/2/0 item.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	31-1	31.1	Item as written suggest that at least one clock must be operative. For operations conducted in VFR conditions, a clock is not required.	Suggest two separate items. First item: D/-/1 (no remarks) Second item: C/-/- Any in excess of those required by 14 CFR operating rule may be inoperative.	Revised 31.1 to meet the rule. In addition (O) procedure added to determine an accurate timepiece that may be used. This matches relief for other single engine turbo prop aircraft's MMEL.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	31-2	31.5	Master CAUTION Pushbutton item does not have any information in columns 1, 2, or 3.	I believe the remarks are the problem and should be deleted.	Deleted the remark, "Any in excess of those required by 14 CFR may be inoperative."
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	31-2	31.7	Just stating, Deleted, Revision 5, is somewhat confusing as to what was deleted.	Add information to show the relief is now part of the FDR. If the previous note was correct, then FDR item may need to rename as a "CVFDR".	Added a remark to reference Item 23-9, Cockpit Voice Recorder (CVR). The item includes relief for CVRs with and without a Flight Data Recorder. The item Lightweight Data Recorder was not a correct entry per Pilatus Aircraft. It was never an option on the legacy aircraft.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-1	33.1	NOTE 2 is not applicable.	Remove note 2 and keep note 1 without the note 1 notation.	Concur: Note 2 removed. NVG are not applicable.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-2	33.5	Third set of relief currently written as a paragraph. For standardization and readability suggest provisos.	Suggest the following: May be inoperative for night operations provided: a) Recognition Lights are installed and operative, and Taxi Light is operative.	Concur: Updated remarks.

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-2	33.6	This item uses, "operations are not conducted between sunset and sunrise", while most use the term, "night operations".	For consistency, use one term or the other, not both. Since PL 25 uses, "Night" suggest using the "night operations" for all such restrictions.	Concur. Reworded to include "night operations".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-2	33.10	Relief currently written as a paragraph. For standardization and the ability to defer under the different restrictions, suggest two separate items.	Suggest the following two separate items: C/2/1 (no remarks or One may be inoperative) C/2/0 May be inoperative for other than night operations.	Concur. Separate items added for 33.10.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-2	33.11	MMEL states, "May be inoperative." This is not standard throughout the MMEL.	For standardization, either add, "May be inoperative" or all blank items, or remove "May be inoperative" when the sentence stands alone.	"May be inoperative" retained. Standardized as noted.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	33-2	33.12	MMEL states, "May be inoperative." This is not standard throughout the MMEL.	For standardization, either add, "May be inoperative" or all blank items, or remove "May be inoperative" when the sentence stands alone.	"May be inoperative" retained. Standardized as noted.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-1	34.3	First item, Item column seems to be missing any associated remarks. Looks like the remarks should be blank since the restrictions are located in the a) and b) item.	Remove C/-/1 to avoid confusion.	Removed C/-/1.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-2	34.5	Number required shows 0, but remarks state, must be operative on the left side for IFR passenger carrying operations.	Update number required to show a "dash".	Added "-" for number required.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-2	34.6	Note below the "D" item seems out of place. Number required is one, so a note stating as least one is required does not make sense. Looks like the note should be located below the "B" item.	Relocate the note to below the "B" item.	Relocated the note to below the "B" item.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-3	34.16	Wording indicates that a MFD would ground the aircraft if WR is required by 14 CFR 135 requires a WR unless certain conditions are met.	Reword to, "May be inoperative provided Weather Radar is considered inoperative."	Concur. Updated remarks to "May be inoperative provided Weather Radar is considered inoperative (refer to 34-8)."
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-5	34.19 34.20	Both Warning and Detection Systems are not required by 14 CFR for this aircraft. These are only required for 121 operations.	Update MEL to show the INSTALLATIONS NOT REQUIRED BY CFR remarks per FAA PL 67 R4.	Updated in accordance with Policy Letter 67 Revision 4.

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David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	34-14	34.34	First set of provisos, states, Any in excess of one", but number required shows 0. Number required does not match remarks.	Change number required to 1.	Changed number required for dispatch to "1".
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	35-1	35.1	Grammer for the "D" item is incorrect.	Should state, "May be inoperative provided no cabin occupants are carried".	Corrected grammar.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	35-2	35.5	Proviso b) seems to indicate no relief for an "operative" passenger seat.	Suggest the following: (O) One or more may be inoperative provided affected seats and lavatories are blocked and placarded to prevent occupancy.	Non concur. This is wording from EASA MMEL. In a) affected seats are blocked and placarded. These seats are no longer an operative passenger seat. This identifies the seats in "b)" that may be used.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	52-1	52.5 52.6 52.7	Same comment as MMEL item 21.17.	Update MMEL to: May be inoperative provided: a) Aircraft is operated in an unpressurized configuration, and b) Aircraft is operated at or below 10,000 ft. MSL.	Concur. Remarks updated.
David W. Burk Aerodox, Inc. dburk@aerodox.c om	4/15/25	56-1	56.1	Same comment as MMEL item 21.17.	Update MMEL to: May be inoperative provided: a) Aircraft is operated in an unpressurized configuration, and b) Aircraft is operated at or below 10,000 ft. MSL.	Concur. Remarks updated.
Gareth Hearne, Pilatus Aircraft Ltd gareth.hearne@pil atus-aircraft.com	5/02/25	21-1	21-1 A)	Item name is missing.	Add item name as "Fresh air ventilation outlets".	Added item, "Fresh Air Ventilation Outlets" to 21-1 a).
Gareth Hearne, Pilatus Aircraft Ltd gareth.hearne@pil atus-aircraft.com	5/02/25	31-2	31-7	Item "Lightweight Data Recorder" has been deleted, but it would be beneficial to the MMEL user to explain why.	In column 4 add a note that this item is instead covered by item 23-9 (Cockpit voice recorder (CVR)).	Added comment, "Reference Item 23-9, Cockpit Voice Recorder (CVR)"
Gareth Hearne, Pilatus Aircraft Ltd gareth.hearne@pil atus-aircraft.com	5/02/25	34-3	34-10	The provisos in column 4 do not incorporate the latest changes made to the EASA MMEL (02395 Issue 1, Rev 9).	Include the new provisos (radar altimeter to be deactivated, and TAWS and TCAS to be considered inoperative).	Added Provisos for Radar Altimeter.
Alan Hoffert AFS-130	6/02/25	25-5	25-7	Category "A" item is not applicable for this aircraft. Only 121 operations require EMK	Remove the first category item. Retain second item for those companies that want to add an EMK.	Removed due to rule requirement for this size aircraft.