

FINAL COMMENT LOG

Originating Office: FTW-AEG		Document Title/Description: MMEL EC-135 Rev 8, Airbus Helicopters Deutschland GmbH (AHD), EC135P1, EC135P2, EC135P2+, EC135P3, EC135T1, EC135T2, EC135T2+, EC135T3, (TCDS H88EU)			POC and Phone Number: Philip Whiting, 817-222-5299		Suspense Date: 03/30/2021	
Committer Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response		
David S. Ryon AFS-210 for AFS-240	2/21/20	31-5	3110-04, c) Instrument Control Panel	General: Formatting only – red color word in Remarks	Change to black coloring.	Changed red to black.		
David S. Ryon AFS-210 for AFS-240	2/27/20	63-1	6340-01 Transmission oil pressure indicating system	General: Suggestion only – order of provisos	Consider placing current proviso c first, followed by current proviso a, then current proviso b. This should make for an easier flow.	Agreed. Rearranged the provisos.		
David S. Ryon AFS-210 for AFS-240	3/11/20	34-1	34-14-01 2) Airspeed Indicator Dual Pilot Operation	General: Suggest “of” instead of “to” in proviso for better clarity	Change proviso for Repair Category B to “Any in excess of one may be inoperative for VFR other than night provided:”	Changed “to” to “of.”		
David S. Ryon AFS-210 for AFS-240	3/11/20	33-3	3340-06 Dual Color Anti-collision Light System	Regulatory: First Item proviso does not appear to meet the requirements of 91.209(b)	Remove from MMEL if not in compliance, or add additional provisos to bring into compliance with 91.209(b)	Added “Any in excess of those required by 14 CFR may be inoperative provided:”		
David S. Ryon AFS-210 for AFS-240	3/11/20	33-3	3340-06 Dual Color Anti-collision Light System	Regulatory: Second and Third Item provisos do not appear to meet the requirements of 91.209(b)	Suggest consider adding requirements such as “red mode is operative and switched ON” and “white mode is operative and switched ON” or similar if these provisos will meet the requirements, otherwise, remove from MMEL if not in compliance.	Added “Any in excess of those required by 14 CFR may be inoperative provided:” to the second and third item provisos.		
David S. Ryon AFS-210 for AFS-240	3/18/20	33-3	3340-07 Landing Lights	General: Suggest add “of” in first proviso for better clarity	“Any in excess of those required by 14 CFR may be inoperative.”	Added the word “of.”		
David S. Ryon AFS-210 for AFS-240	3/19/20	25-5	2562-01 ELT	Policy: Extra word in second D Repair Category proviso – “inoperative”	Suggest wording from PL 120 – “Any in excess of those required by 14 CFR may be missing”.	Removed the words “inoperative or.”		
David S. Ryon AFS-210 for AFS-240	3/19/20	34-9	3444-01 Radar Altimeter System	Policy: Suggest wording in first c) proviso follow PL-131 for better clarity	Suggest wording from PL 131 – “Night off-airport landings or night landings at unimproved areas are not conducted,”	Changed proviso to “Night off-airport landings or night landings at unimproved areas are not conducted,”		

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David S. Ryon AFS-210 for AFS-240	11/23/20	34-9	3444-01 Radar Altimeter System	Comment: This probably works as is but suggest wording in 14 CFR Part 135 Operations c) proviso follow PL-131 for better clarity	Suggest wording from PL-131 – “Night off-airport landings or night landings at un-improved areas are not conducted,” (Remove “No” at the beginning)	Accepted. Removed the word “No” so the proviso reads: “Night off airport landings or night landings at un-improved areas are not conducted,”
Tom Luipersbeck AFS-250	2/18/20	34-10	3444-03 Helicopter Terrain Awareness and Warning System (HTAWS)	Category D Relief should probably specify “Other than Helicopter Air Ambulance (HAA) Operations” as opposed to “Other than Air Carrier Operations” as the HTAWS regulation only applies to HAA. See Part 135, Subpart L, 135.605.	Change Cat D to specify “Other than Helicopter Air Ambulance (HAA) Operations”.	Changed Cat D to specify “Other than Helicopter Air Ambulance (HAA) Operations”.
Tom Luipersbeck AFS-250	2/18/20	45-1	4500-05 *** Flight Data Monitoring System (FDMS)	Category D Relief should probably specify “Other than Helicopter Air Ambulance (HAA) Operations” as opposed to “Other than Air Carrier Operations” as the FDMS regulation only applies to HAA. See Part 135, Subpart L, 135.607.	Change Cat D to specify “Other than Helicopter Air Ambulance (HAA) Operations” NOTE: Why does FDMS have a different JASC code than other helicopters like the A-119?	Changed Cat D to specify “Other than Helicopter Air Ambulance (HAA) Operations” Both MMELS (EC135 & A229) classify the FDMS under the 45- - “CENTRAL MAINT. SYSTEM” JASC code. The significance of the last two digits is simply to individually identify different pieces of equipment under the same category.
John Drago AFS-820 330-648-3887	03/06/20	23-4	2370-01	Repair Category A. This category item must be repaired within the time interval specified in the “Remarks or Exceptions” column of the aircraft operator’s approved MEL. For time intervals specified in “calendar days” or “flight days”, the day the malfunction was recorded in the aircraft maintenance record/logbook is excluded. For all other time intervals (i.e., flights, flight legs, cycles, hours, etc.), repair tracking begins at the point when the malfunction is deferred in accordance with the operator’s approved MEL. CVR for other than air carrier, Is this required? Repair category A doesn’t seem to fit without a specified repair interval.	Specify required repair interval.	No change made. The MMEL relief reflects the repair interval and relief exactly as it appears in the policy letter.

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John Drago AFS-820 330-648-3887	03/06/20	31-14	3130-01	FDR for other than air carrier, Is this required? Repair category A doesn't seem to fit without a specified repair interval	Specify required repair interval.	No change made. The MMEL relief reflects the repair interval and relief exactly as it appears in the policy letter.
Mike Mattler Airbus Helicopters	10/15/20	31-2	3110-04 1)	Change "EFS 40" to "EFIS 40."	Change "EFS 40" to "EFIS 40."	Changed "EFS 40" to "EFIS 40."
Mike Mattler Airbus Helicopters	10/26/20	77-1	7722-01	PVW phone conversation with MM on 10/26/20.	MM agreed changing the word "indicator" to "needle" would be more accurate.	Changed the word "indicator" to "needle."
Mike Mattler Airbus Helicopters	10/26/20	77-2	7722-02	PVW phone conversation with MM on 10/26/20.	MM agreed changing the word "indicators" to "needles" would be more accurate.	Changed the word "indicators" to "needles."
Philip Whiting FTW AEG	10/28/20	28-1	2820-01	14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	Change "MERGED wiith 2841-06, Revision 8." To "DELETED, Revision 8."	Changed "MERGED wiith 2841-06, Revision 8." To "DELETED, Revision 8."
Philip Whiting FTW AEG	10/28/20	28-1	2820-02	14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	Change "MERGED wiith 2841-06, Revision 8." To "DELETED, Revision 8."	Changed "MERGED wiith 2841-06, Revision 8." To "DELETED, Revision 8."
Philip Whiting FTW AEG	10/29/20	28-2	2841-04	An inoperative main tank fuel sensor caused an inaccurate fuel quantity. 14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	DELETE the relief.	DELETED the relief.
Philip Whiting FTW AEG	10/29/20	28-3	2841-05	An inoperative main tank fuel sensor caused an inaccurate fuel quantity. 14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	Remove the relief which was added in this revision.	Removed the relief.
Philip Whiting FTW AEG	10/28/20	28-3	2841-06	14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	Remove the relief(added this revision) for the inoperative quantity indicator of "Fuel Supply Tank 1/2." (for H/C equipped with CDS or CPDS only) (for H/C equipped with CDS only: Caution Display: F QTY FAIL) (for H/C equipped with CPDS only): CAD yellow Indication: F QTY FAIL)	Removed the relief for the inoperative quantity indicator of "Fuel Supply Tank 1/2."
Philip Whiting FTW AEG	10/28/20	28-3	2841-07	14 CFR 91.205(b)(9) requires a "Fuel gauge indicating the quantity of fuel in each tank."	Remove the relief (added this revision) for the inoperative quantity indicator of "Fuel Supply Tank 1/2." (for P3H/T3H H/C only) (Master List Indication: FUEL QTY FAIL)	Removed the relief for the inoperative quantity indicator of "Fuel Supply Tank 1/2."

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Philip Whiting FTW AEG	10/27/20	63-2	6340-03	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Delete the relief for the Main Gear Box Chip Detector System.	Deleted the relief for the Main Gear Box Detector System.
Philip Whiting FTW AEG	10/27/20	63-2	6340-04	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Delete the relief for the Main Gear Box Chip Detector System.	Deleted the relief ,which was added in this revision, for the Main Gear Box Detector System.
Philip Whiting FTW AEG	10/27/20	63-2	6340-05	After removing the relief (added and removed in this revision process) item "6340-05 MGB HIGH TEMP Caution Indication" needs to be renumber to 6340-04.	After removing the relief (added and removed in this revision process) item "6340-05 MGB HIGH TEMP Caution Indication" needs to be renumber to 6340-04.	Renumbered item "6340-05 MGB HIGH TEMP Caution Indication" to "6340-04 MGB HIGH TEMP Caution Indication."
Philip Whiting FTW AEG	10/27/20	65-1	6540-01	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Delete the relief for the Tail Rotor Gear Box Chip Detector System.	Deleted the relief for the Tail Rotor Gear Box Chip Detector System.
Philip Whiting FTW AEG	10/27/20	65-1	6540-02	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Delete the relief for the Tail Rotor Gear Box Chip Detector System.	Removed the relief, which was added in this revision, for the Tail Rotor Gear Box Chip Detector System.
Philip Whiting FTW AEG	10/27/20	77-2	7722-05	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Removed the relief, which was added this revision, for the Engine Chip Detector System.	Removed the relief, which was added this revision, for the Engine Chip Detector Sytem.
Philip Whiting FTW AEG	10/27/20	77-3	7723-06	PL-63 states "Each FOEB Chairman will ensure that MMELs do not provide relief to instrument and equipment items that are required to accomplish emergency procedures."	Remove the relief, which was added in this revision, for the Engine Chip Detector System.	Removed the relief, which was added in this revision, for the Engine Chip Detector System.