

FINAL COMMENT LOG

Originating Office: MKC-AEG	Document Title/Description: MMEL CE-208 Rev 12, Textron Aviation Cessna 208/208B Caravan/Grand Caravan/Grand Caravan EX	POC and Phone Number: Jeffrey F. Rock, 515-289-4828	Suspense Date: 08/18/2020
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Committer Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
AFS-200 Robert McIntyre	8/5/20	25-7 35-1	60-04 30-01	Policy: PL-43 lists PBE under ATA 35. The MMEL lists Protective Breathing Equipment (PBE) on page 35-1 and Portable Protective Breathing Equipment (PBE) on page 25-7. If these two listings are for the same equipment, one listing would be sufficient. PBE is required by 121.337.	Combine the two listings, inter under ATA 35 Oxygen, and include the verbiage in the remarks section with proviso a-c and NOTE as suggested by the policy letter.	Non-concur This relief item in PL-79 is intended for a 14 CFR Part 121 operator.
	8/5/20	33-1	10-01	Policy: PL-77, cockpit lighting, includes two notes in the remarks section.	Ensure remarks section includes the two notes from the policy letter	Non-concur PL-084 is specific to aircraft operated RVSM. The Model 208/208B cannot operate in this environment.
	8/6/20	25-2	20-01-02	Policy: PL-79 lists Under Seat Baggage Restraining System as a C repair category. Letter also includes "(O)" requirement.	Change repair category from D to a C category and add "(O)" symbol requirement	Non-concur. This PL is not applicable by 14 CFR Operating Rule.
	8/6/20	25-2	20-01-01	Policy: PL-79 lists relief for Armrest with and without seat positioning controls. Remarks don't appear to conform to language in policy for either circumstance. Provisos are different depending which type of seat.	Identify seats as controlled or uncontrolled and use corresponding recommend proviso per policy letter.	Non-concur This relief item in PL-79 is intended for a 14 CFR Part 121 operator.
	8/6/20	25-3	20-01-05-20	Policy: PL79 requires a "(M)" procedure for the remarks section.	Ensure (M) symbol is included.	Non-concur This relief item in PL-79 is intended for a 14 CFR Part 121 operator.
	8/6/20	34-2	16-01	Policy: PL-84 list altitude alerting system as category A and includes proviso a and b	Ensure category and remarks follow the policy letter category.	Non-concur PL-084 is specific to aircraft operated RVSM. The Model 208/208B cannot operate in this environment.

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	8/6/20	22-2	10-03-02	Policy: PL-93 autopilot disconnect lists relief for disconnect however MMEI proviso require autopilot system be deactivated. Disengagement of autopilot reference CFR 121.1329. Ensure provisos are correct and no relief of disconnect is intended.	If relief intended follow policy letter categories and remarks sections.	Non-concur. This PL is not applicable by 14 CFR Operating Rule.
	8/6/20	25-4	20-02-50-01	Policy: PL-100 Pending proviso change and update for cargo restraint systems available for review.	Incorporate proviso change per current pending revision guidance.	Incorporated
	8/6/20	34-15	55-01	Policy: PL-105 ADS-B provides the proviso and repair interval to standardize the MMEL for the ADS-B system.	Review letter to ensure correct application of policy is listed in the MMEL for Item, Category, and Remarks.	Incorporated PL105
	8/7/20	34-5	21-03	Policy: PL-111 Any MMEL that grants relief for the Standby Attitude Indicator must be changed to use the provisos attached to the letter.	Include repair categories and provisos from PL-111.	Non-concur Relief amended to AFM/POH Limitations which trumps FAA MMEL Policy Letter
	8/7/20	25-5	60-01-02	Policy: PL-120 lists two category A relief options. Only one option of the two options is listed.	Ensure the two category "A" options from the policy letter are listed and include provisos.	Incorporated
	8/7/20	IV	ATA 21	General: Page 21-1, Item 21-21-03 added the requirement for one Deck Skin fan to be operative. Item 21-21-02 is similar and is included in the Highlight of Changes.	Include 21-21-03 in ATA 21 Highlight of Changes,	Incorporated
	8/10/20	IV	ATA 21	General: Page 21-3 a "NOTE:" was added to Item 22-02-02	Include 22-02-02 in ATA 21 Highlight of Changes,	Incorporated
	8/10/20	IV	ATA 22	General: Page 22-2 Item 22-10-04 address relief for Autopilot/Trim Disconnect Function	Review Highlight of change ATA 22 for 22-10-04 to determine if an entry is needed. Now blank.	No changes made to MMEL item 22-10-04 from previous revision. Removed from Highlights of Change
	8/10/20	V	ATA 25	General: 25-20-03 could not find a reference to ashtray	Ensure reference is applicable	Item omitted unintentionally. Previously approved relief returned to this draft.

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	8/10/20	33-3	40-07	Regulatory: Position lights are to be operated sunset to sunrise. 40-06 reflects current regulation, 40-07 not required.	40-07 not required, should be removed.	Non-concur Although position lights are not required for night operations, without this relief, the aircraft could not be operated at all with a failed position light system.
	8/10/20	33-2	40-01 40-20	Regulatory: 91.209 (b) requires lighted anticollision lights to operate. Aircraft with anticollision strobes and rotating beacon require one system when operating day or night.	Ensure provisos meet regulatory requirement of 91.209(b).	This relief has been thoughtfully reviewed and approved since FAA MMEL Revision 7. Previous FAA-approved relief in Revision 6c stated, "May be inoperative for day operations".
	8/10/20	80-1 80-2	00-01-01 00-01-02 00-01-02	Policy: Proviso a) turned off	Consider switch position in caps "OFF"	Non-concur Proviso item a) is not referencing a specific switch position as would be indicated if the proviso item had been written as follows, "Starter switch is turned to the OFF position." Currently approved relief is written to address two starting possibilities, battery or ground power-assisted starts.
	8/10/20	31-2	50-06	Policy: PL-31, line 18 delete all instances of "if installed"	Delete "if installed"	Non-concur This proviso requires this reference to differentiate the installation possibilities and enhances the relief.
AFS-300				No comments.		
AFS-800				No comments.		

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<p>Aviation Manuals.com</p> <p>Allison Barber, Senior Advisor, MELs, 240-546-4030, abarber@aviation manuals.com</p>	7/9/20	22-1, 22-2,	ATA 22	<p>-10-01 Autopilot, -01 Non-G1000 Systems, letter c):</p> <p>Unsure about the intent of the phrase "IFR-passenger carrying operating rule." Is this relating to passenger carrying operations for hire? Or just any operations conducted under IFR when passengers are on board?</p> <p>We have the same note above for the following items: -10-03 Garmin GFC 600 Autopilot (STC SA01844WI Only), letter c) -10-03 Garmin GFC 600 Autopilot (STC SA01844WI Only), -02 Autopilot Disconnect Button (All Buttons), letter c)</p> <p>-10-03 Garmin GFC 600 Autopilot (STC SA01844WI Only), -03 GAD 43 Adapter for Radar-Equipped Aircraft (STC SA02017SE-D), letter a)</p> <p>Letter a) states that autopilot and yaw damp are considered inoperative but not for aircraft with GFC 600 installed by STC SA01844WI, however this item is a sub-item to the Garmin GFC 600 Autopilot item which only allows for relief for installation by STC SA01844WI. Is letter a) needed here?</p> <p>We have the same note above for the following items: -10-03 Garmin GFC 600 Autopilot (STC SA01844WI Only), -04 GAD 43 Adapter for Non-Radar-Equipped Aircraft (STC SA02017SE-D) -10-03 Garmin GFC 600 Autopilot (STC SA01844WI Only), -06 Flight Director, letter b)</p>		Proviso language amended to clarify operational restrictions.

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	7/9/20	24-1	ATA 24	-10-01 Standby Alternator, letter c): Unsure about the intent of the phrase "IFR-passenger carrying operating rule." Is this relating to passenger carrying operations for hire? Or just any operations conducted under IFR when passengers are on board?		Proviso language amended to clarify operational restrictions.
	7/9/20	30-1	ATA 30	-00-01 TKS Ice Protection System: Item is duplicated on page 30-3.		Duplicate Removed
	7/9/20	33-3	ATA 33	Unsure about the difference between item -40-06 Position (Navigation) Light and item -40-07 Position (Navigation) Light		Duplicate Removed
	7/9/20	34-2	ATA 34	ATA 34 -14-02 Analog Vertical Speed Indicator (Non-G1000 Only) Unsure if the intent is that the Left side must always be operative in all cases or that the left side must be operative only if operating rules specify it must be operative. -44-02 Terrain Awareness and Warning System (TAWS) (Including Test Mode) (Class A or B TAWS Required), -05 Class C TAWS/GPWS Equipment Is this relief for Class C equipment installed in addition to the Class A/B equipment installed, since it is a sub-item to TAWS when Class A or B is required?		Item 34-14-02 addresses: 14 CFR Part 91.205(b)(c)(d), and 14 CFR Part 135.149, 135.159, 135.163(a) Textron Aviation does not offer Class C TAWS. This relief is allowed by FAA MMEL Policy Letter, PL-054. Sub-item -05 should be seperated out as its own relief item.

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Fly The Whale, Land & Sea-Based Charter Flights Chrys Koutsaplis, Director of QC/Chief Inspector, 203-988-4143, chrys.koutsaplis@ flythewhale.com	7/27/20	32-1	32-46-04-01 and -02	I would like to comment on items 32-46-04-01 and 32-46-04-02. The Wipaire Model 8750 floats, installed under STC SA1311GL, have mechanical means of visually ensuring the position of the landing gear (UP or DOWN) by both crew members, in case of light failure. There are indicators on the top deck of the floats that move with the Main Landing gear and show the position for water or land use. There are, also, mirrors installed on both wings so the crew can visually verify the position of both the nose and the main landing gear.	I propose to take into consideration the above comment and make the necessary changes to MMEL Rev. 12, so that the aircraft is able to land in the water if the any of the UP or DOWN lights are inoperative.	Non-Concur – Does not comply with limitations/procedures in section 3 and 4 as outlined in Wipline Model 8750 Amphibious Float Supplement.
Ken Owens polarqc@hotmail.com, 907-764-3229	17 August 2020	I	SYSTEM NO. 73	System description missing two (2) words (And Control).	Correct system description to read: Engine Fuel and Control	Incorporated
	17 August 2020	21-1	21-20-03	Missing STC number	Add missing STC number: STC SA0230AK-D	Incorporated
	17 August 2020	22-3	22-10-03	Extra line between (STC SA01844WI Only) and (Cont'd)	Remove extra line	Non-concur. This spacing is Textron standard practice to clearly communicate the relief is continued from the previous page.
	17 August 2020	22-6	22-13-02	Wrong spelling (Acutate)	Correct spelling (Actuate)	Incorporated
	17 August 2020	22-7	22-13-02	Wrong spelling (Acutate)	Correct spelling (Actuate)	Incorporated
	17 August 2020	22-8	22-13-02	Wrong spelling (Acutate)	Correct spelling (Actuate)	Incorporated

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	17 August 2020	23-5	23-50-05	<p>Proviso c) Verbiage</p> <p>c) Headset is used for associated inoperative speaker, including during emergency procedures.</p> <p>Remove: (, including during emergency procedures)</p> <p>The last part of sentence adds nothing to the first part.</p>	<p>Reword proviso c).</p> <p>c) Headset is used for associated inoperative speaker.</p>	<p>Non-concur.</p> <p>FAA MMEL revision 7b items 23-50-07 - Cockpit Overhead Communication Speaker, and 23-50-08 – KMA-24 Audio Amplifier, were combined in FAA MMEL revision 8 as item 23-50-05.</p>
	17 August 2020	25-2	25-20-01	<p>Proviso b) allows for a broken seat to be used.in certain flight conditions e.g. cruise.</p>	<p>Change proviso b) to be more restrictive: b) Affected seat(s) are placarded "DO NOT OCCUPY."</p>	<p>Non-concur.</p> <p>There are no 14 CFR Part 91 or 135 Operating Rules that require a seat to remain unoccupied in-flight</p> <p>References:</p> <p>14 CFR 91.107(a)(3) 14 CFR 135.128(a)</p>
	17 August 2020	25-3	25-20-01-04	<p>Remark allows for a seat with a broken seat belt/shoulder harness to be used.in certain flight conditions e.g. cruise.</p>	<p>Change remark to be more restrictive: Affected seat is placarded "DO NOT OCCUPY."</p>	<p>Non-concur.</p> <p>There are no 14 CFR Part 91 or 135 Operating Rules that require a seat to remain unoccupied in-flight</p> <p>References:</p> <p>14 CFR 91.107(a)(3) 14 CFR 135.128(a)</p>

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	17 August 2020	27-1	27-00-01	Trim Position Indicators (Aileron, Rudder, and Elevator) has relief that allows for flight into icing conditions. Crew may make elevator trim inputs during intermittent icing conditions and not know how much trim is still available. Recommend Elevator proviso prohibits flight into icing. Single Engine MMEL (SE) has proviso prohibiting flight into icing conditions with .	Break-out all three trim indicators (Aileron, Rudder, and Elevator) into separate relief items and retain original provisos. For elevator, add proviso d), Aircraft is not operated in known, forecast or POH/AFM defined icing conditions.	Non-concur Relief allowed in the FAA Single-engine MMEL could not be written to a specific aircraft. During the FOEB for this MMEL, Cessna, Beechcraft, Piper, and GAMA determined the relief should be overly restrictive as all aircraft in this MMEL could not be evaluated adequately to allow for operations in known or forecast icing. The 208 MMEL evaluated this condition and environment and determined the relief approved is applicable and appropriate.
	17 August 2020	27-2	27-50-02-02 Proviso d)	Proviso d) missing word: conditions.	d) Aircraft is not operated in known, forecast, or POH/AFM-defined icing conditions.	Incorporated
	17 August 2020	30-5	30-30-01-03 NOTE	Capitalize "Only" in NOTE.	NOTE: R P/S HEATER amber CAS message will appear on PFD (G1000 Only).	Incorporated
	17 August 2020	34-5	34-22-01-01	No Item description for 1 st dispatch option. Only difference from dispatch option 2 is A relief. (see comment below)	Enter Item description	Non-concur Relief is intentionally written to address 14 CFR Part 135 operations (item -01) vs 14 CFR Part 91 operations (item -02)
	17 August 2020	34-5	34-22-01-01	No Item description for 2nd dispatch option. (see comment above)	Enter Item description	Non-concur Relief is intentionally written to address 14 CFR Part 135 operations (item -01) vs 14 CFR Part 91 operations (item -02)
	17 August 2020	34.-15	Add Item 34-52-02	Added relief for ADS-B Policy Letter PL-105 is missing. See statement on page VI 34-52-02	Add relief for ADS-B Policy Letter PL-105	Incorporated PL 105
	17 August 2020	73-1	ATA System header	System description missing two (2) words (And Control).	Correct system description to read: 73. Engine Fuel and Control	Incorporated

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<p>Redding Aero Enterprises, Inc.</p> <p>Victor Clarke, Air Carrier Certificate MNVA-309B, 530-224-2300, victor@reddingjet.com</p>	7/21/20	In General	In General	<p>This is to request MEL relief for an item not currently identified in the current Rev. 11A or draft Rev. 12 Cessna Model 208/208B MMEL.</p> <p>The item in question is a Garmin Model GMA-350 Audio Panel, which also serves the function of Marker Beacon Receiver. Please note installation of this item does not require an STC as it is not considered a major repair or alteration. The GMA-350 carries the following TSO approvals for replacement of like equipment: Aircraft Audio Systems and Equipment - TSO-C139 and Airborne Radio Marker Receiving Equipment - TSO-C35d.</p> <p>As background, the MMEL identifies Garmin models GMA-340 and GMA-347 which are combined into a single reference, i.e., GMA-340/347. Production of both these models has been discontinued by the manufacturer. The GMA-342/345 and -350 are Garmin current-production units and functionally-identical to the 340/347.</p>	<p>Accordingly, the relief we are requesting is exactly the same as currently offered in the MMEL for the GMA-340/347, i.e., we are not requesting any additional relief or variance from what is already specified in the MMEL. The MMEL System identification for the GMA 340/347 Audio Panel function is 23-50-07 and 34-34-01 for the Marker Beacon Receiver.</p> <p>Our company currently operates the following Cessna 208B aircraft with a GMA-350 installed:</p> <p>N106VE, Serial No. 208B0769 N121HA, Serial No. 208B0069 N208PG, Serial No. 208B0799 N208TM, Serial No. 208B0413 N90GL, Serial No. 208B0229 N932C, Serial No. 208B0032</p> <p>Please note there is precedent within the same MMEL for this request. This is illustrated in Item 34-25-02, Multi-Function Display, which also calls out two (2) models, but adds the option "or Equivalent" to provide for comparable equipment. In essence, this, or a more encompassing designation such as "GMA Series", is what we are requesting.</p> <p>We greatly appreciate your consideration of a our request. Please don't hesitate to contact me anytime at (530) 224-2300 or victor@reddingjet.com if you have any questions or require further information.</p>	<p>Incorporated GMA 350 or equivalant. As only the 340/347 are installed by Textron, added a Note to specify that Textron recommended O procedures are for the GMA 340/347 only. Operator can specify their O procedure when making MEL.</p>

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Westwind Air Service Elijah A. Riggs, Director of Operations, 602-732-6982, eriggs@westwindairservice.com	7/15/20	In General	In General	I am the Director of Operations for a 135 company out of Phoenix, Arizona. We have six CE-208B's.	I would like to add my input to extend the auto-pilot MEL as long as the aircraft is being flown in VFR conditions, or with a second in command in IFR conditions with passengers onboard. I would also like to see the MEL for the air conditioning be extended.	Autopilot Relief: This relief is governed by FAA MMEL Policy Letter, PL-101, item 3) however; this relief will be looked at in future revisions to the PL for VFR type operations. Extension of item 21-50-01: Textron Aviation concurs this item can be extended to a Category D item as the equipment installed is optional.