

FINAL COMMENT LOG

Originating Office: FTW-AEG		Document Title/Description: MMEL S-76A-B-C Rev 12, Sikorsky Aircraft Corporation, S-76A, S-76B, S-76C, (H1NE)			POC and Phone Number: Philip (Vince) Whiting, 817-222-5272		Suspense Date: 05/10/2021
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response	
David Ryon AFS-210 for AFS-240	5/1/20	30-3	3030-03	General: First B Category item has an extra word (provided) in the Remarks.	Consider using wording - Both may be inoperative for VFR provided Ambient temperatures are above +4.5 °C (+40 °F).	Removed extra word (provided).	
David Ryon AFS-210 for AFS-240	5/6/20	45-1	4500-03 FDMS	General: The Repair Category is missing and the Remarks comment – Refer to 4500-02 is somewhat unclear in intent	Consider Adding an appropriate Repair Category and standard verbiage such as may be inoperative provided, etc. if appropriate.	Removed 4500-03. The specific FDMS systems previously evaluated by the AEG are already included in 4500-02. No entry required in highlights of change as is was not in Rev 10.	
David Ryon AFS-210 for AFS-240	5/12/20	26-1	2611-01 Baggage Compartment Smoke Detector	General: Remarks for the first Repair Category C item could be better aligned with PL-102 and PL-108.	Consider using wording such as "(O) May be inoperative provided procedures are established and used to ensure the compartment remains empty."	Added an (O) procedure requirement. No other changes made. PL-102 is for Part 25 Airplanes and part 121 operations. The relief provided in the S-76 MMEL is tailored to helicopters and meets the intent. PL-108 does not apply to helicopters.	
David Ryon AFS-210 for AFS-240	5/12/20	23-3	2312-01 Communication Systems	Policy: Repair Category is missing in first item (Communication Systems). (PL-95)	Suggest place "D" in Repair Category for Communication System (VHF and UHF)	As per PL 95, added "D" in repair category for Communication Systems (VHF and UHF).	
David Ryon AFS-210 for AFS-240	5/12/20	23-4	2360-01 Static Wicks	General: Remarks can add "inoperative" for clarity.	Consider wording such as "(O) Any in excess of those required by the RFM may be inoperative."	Added "...may be inoperative." The proviso now reads "(O) Any in excess of those required by the RFM may be inoperative."	
David Ryon AFS-210 for AFS-240	5/12/20	34-1	3421-01 Standby Attitude Indicator	General: For standardization, Repair Category(s) and Remarks from PL-111 could be utilized.	Consider using Repair Category(s) and Remarks from PL-111 for standardization and an additional option if appropriate.	No change made.	

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David Ryon AFS-210 for AFS-240	5/12/20	33-2	3320-01 Passenger Light Information Sign	General: For standardization with PL-123 and readability only, suggest use Passenger Lighted Information Sign.	Consider using "Lighted", if appropriate.	Changed "Light" to "Lighted."
David Ryon AFS-210 for AFS-240	5/12/20	34-3	3444-01 Radar (Radio) Altimeter System	Policy: Starting at proviso e), variance in provisos from PL-131.	Please use provisos from PL-131.	Changed provisos to match current revision of PL-131.
David Ryon AFS-210 for AFS-240	12/9/20	23-4	2360-01 Static Wicks	General: For this optional item - Remarks can be expanded slightly for clarity.	Consider wording such as "(O) Any in excess of those required by the RFM may be inoperative."	No change. The RFM does not address static wicks.
Tom Luijpersbeck AFS-250	4/15/20	34-4	3444-04	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". No entry required in highlights of change as is was not in Rev 10.
Tom Luijpersbeck AFS-250	4/15/20	45-1	4500-03	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".	Removed 4500-03. The specific FDMS systems previously evaluated by the AEG are already included in 4500-02. No entry required in highlights of change as is was not in Rev 10.
Greg Young AFS-370	6-03-20	XIV	2422-01	This item is for Inverter not generator and appears to have a misplaced or non-applicable procedure. 4 th M procedure to deactivate and secure generator seems to be applicable to items 2421-01 (AC Generator) or 2430-01 (DC Generator).	Remove, "4 th M procedure.	No change. The 4 th (M) procedure requirement is for deactivating and securing the inoperative inverter.
Greg Young AFS-370	6-03-20	XX	6700-02 Collective Stick Trim	Procedure text says, "Procedure for crew to ensure a crewmember guards the cyclic at all times."	Change to "...guards the collective..."	Changed procedure to read "guards the collective."

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Greg Young AFS-370	6-03-20	24-3	2422-01 (3)	Remarks refer to AC Generator and Inverter Switching may be inoperative. AC Generator is addressed under 2421-01. Unclear why it is also included here.	Remove reference to AC Generator. (Was the intent to be inverter instead?)	There was numbering issue that was the root of this confusion. Assigned sequence number 2422-02 for Dual Inverters (without AC Generator and Inverter Switching) (S-76A/S-76C only).
Greg Young AFS-370	6-03-20	25-2	2520-01 2(b)	Current verbiage appears contradictory: (M) May be inoperative or disconnected provided seat belt operates normally. If operating normally, belt would not be inoperative.	Remove, "provided seat belt operates normally".	Revised relief to match the relief provided in PL-79.
John Drago AFS-820 (330)648-3887	05/14/20	23-1	2300-01	Cockpit Voice Recorder (CVR) without Flight Data Recorder Installed And Cockpit Voice Recorder (CVR) installed for an operator other than a holder of an air carrier or commercial operator certificate Repair category specified as 'A' without specified repair interval.	Specify repair interval.	Revised relief to match the relief provided in PL-29. No content was changed. It was a formatting issue.
John Drago AFS-820 (330)648-3887	05/14/20	31-1	3130-01	Flight Data Recorder (FDR) Installed for an Operator other than a Holder of an Air Carrier or Commercial Operator certificate Repair category specified as 'A' without specified repair interval.	Specify repair interval.	Revised relief to match the relief provided in PL-87. No content was changed. It was a formatting issue.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	22-1	2210-01-3	Is item 2210-01 referring to the AFC System or individual autopilots which seem to be covered in item 2200-01?	Clarify.	At the request of the OEM, item 2200-01 has been DELETED to remove any confusion.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	23-1	2300-01	In Sikorsky manuals (and other manufacturers) the CVR, FDR and RIPS are part of Chapter 31. The CVR is also mentioned in Chapter 31 of the MMEL.	For consistency and to avoid confusion please consider putting all recorders in Chapter 31.	The placement in different chapters of the MMEL is due to their respective policy letters placing them there.

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Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	24-2	2422-01	The item description reads 'Inverters (with AC Generator)'.	Remove or clarify '(with AC generators)', this note confuses the sub system relief. Electrical systems may have inverters with switching but without AC Generators.	There was numbering issue that was the root of this confusion. Assigned sequence number 2422-02 for Dual Inverters (without AC Generator and Inverter Switching) (S-76A/S-76C only).
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	25-2	2520-2b	The remarks seem to be conflicting; the item is referring to the seatbelt, but remarks appear to be referring to something else.	Clarify.	Removed the seat belt item proviso to better reflect PL-79. The relief that remains addresses seat belts.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	25-4	2562-03	Item has (M) procedure. No deactivation possible for most common ULBs. Self contained unit with no external connections.	Change to 'May be inoperative'.	Sikorsky and the AEG concur with this change. The (M) procedure has been removed.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	33-3	3350-01	Uppermost relief is incorrect.	Should read "May be inoperative for day."	Changed to "May be inoperative for day (other than night) operations."
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	34-1	3413-01	Vertical Speed Indicator is required for IFR per 135.163(a).	Revise CAT and relief to as described in FAA MMEL R10 Cat B B 2 0 May be inoperative for VFR B 2 1 Copilot may be inop for single pilot IFR	Changed relief to that in FAA MMEL rev 10.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	34-2	3440-03	Supplemental Navigation Displays claims to be moved to 3446-02.	Section 3446-02 does not exist in the draft MMEL.	Changed to the proper reference (3445-02).
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	34-10	3454-01	Remarks for VOR has incorrect reference.	Should read Moved VOR to 3454-02.	Changed to "Moved to 3454-02."
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	73-1	7300-1	Numbering inconsistent with remaining sections.	Should read 7300-01.	Changed to 7300-01.
Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	73-1	7300-2	Numbering inconsistent with remaining sections.	Should read 7300-02.	Changed to 7300-02.

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Robert Stewart Era Helicopters bstewart@erahelicopters.com	Apr 21	77-1	7700-1	Numbering inconsistent with remaining sections.	Should read 7700-01.	Changed to 7700-01.
Rod Duplin Lockheed Martin Corporation roderick.duplin@lmco.com	05/14/20	31-2	3160-01	Writing reference the S-76 MMEL, Rev 12, 31. Instruments, 3160-01. A specific, name brand, Integrated Instrument Display System (IIDIS) is referenced. There are other IIDS manufactured by other suppliers and calling out only one supplier might be a point of confusion.	Can the IIDS be referenced generically?	No change made. This is currently the only system that has been evaluated by the FOEB. Any other systems/STCs will need to be submitted for review via the PL-109 process.
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	23-1	2300-01	Based on us being an "Air Carrier" and having a CVR with FDR currently installed on our aircraft we would be allowed to defer our CVR for 3 days if the FDR operates normally. Many failure modes will cause both the CVR, and FDR portions of the combined system to be inoperative. As a part 135 operator flying a single pilot certified aircraft with "less than 6 passenger seating configuration" we're not required to have a CVR, or an FDR installed. The requirement to have both operational, or in the case of the "CVR only" being inoperative, the 3 day limitation to make repairs puts a much greater burden on us than the FAR part 135 regulations we fall under. This would possibly incentivize operators in our situation to remove the system entirely rather than deal with the added expense of having an aircraft out of service for a piece of equipment not required to be installed per the FAR.	Re-word the MEL so that operators such as us (operators not required under FAR 135.151, and 135.152 to have a CVR or an FDR) are able to defer the equipment for 10 days, giving us time to get the system repaired. Based on the fact that this wording comes from PL-29 we understand that this might have to be a revision to the PL first before the MMEL can be changed to reflect the regulatory requirements.	The AEG will submit this suggestion to the policy holder for consideration. However, an alternative would be for an operator with this item installed to submit a request for relief following the procedure outlined in Policy Letter 109.
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	30-1	3020-02	The MEL for the "(S-76B only)" is more restrictive than the RFM.	Change the MEL to reflect the ability to deactivate and secure the EAPS in the OFF, or ON position as well as add a reference to RFM limitations with the EAPS OFF.	Added relief to for S-76B to deactivate & secure EAPS in OFF or ON position. Added requirement to follow RFM limitations.

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Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	30-2	3030-02	The "NO. INSTALLED" line is incorrect for both pilot's and copilot's static port heaters.	Change "NO. INSTALLED" for Pilot, and Copilot to "2".	No change to MMEL. Sikorsky prefers to keep the number installed for pilot and colpilot as one each so as to agree with the non-EDZ-756 configuration.
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	30-2	3030-02	The Pilot's static ports aren't used at call (capped) on aircraft with the EDZ-756 EFIS installed. The Copilot's ports are still used for the standby barometric altimeter; and for aircraft with the Parker Gull IIDS installed, the RDAU.	Change the category to "D" since these ports aren't used.	As per manufacturers recommendation, there is no change to the relief.
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	31-2	3160-01	The Rogerson Kratos IIDS system is not included in this MEL item.	Add the Rogerson Kratos IIDS system.	No change has been made to the MMEL. This information has been sent to Sikorsky (the STC Holder). As per policy letter 109, the STC holder is the point of contact (POC) for all matters regarding relief for their STC(s).
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	33-2	3340-01, and 3340-03	Our understanding of the anti-collision lighting system on the S-76 has been that the anti-collision light on top of the vertical fin is the unit that meets the certification requirements of FAR 29.1401 due to its placement, and the light on the belly is simply a rotating beacon. This is backed up by the fact that the belly mounted "beacon" is not mentioned in the AMM, or the IPC but is in the type certificate options package for our aircraft. Lumping the belly mounted "rotating beacon" which we understand to be optional equipment into the same item as the vertical fin mounted "anti-collision light system" would reduce our time allowed to procure parts/make a repair from the current 10 days to 3 days.	Add the relief back in for the belly mounted "rotating beacon" as a separate category "C", or "D" item. "D" would be preferable if it is indeed optional equipment as our current understanding believes it to be.	Unmerged the relief from the anti-collision light system. The relief is now a "C" category with the proviso "May be inoperative provided operations do not require its use."

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Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	33-3	3350-01	The first line in "REMARKS OR EXCEPTIONS" says "May be inoperative for night" which contradicts the next statement just below it. Per the highlights this should say "May be inoperative for other than night".	Change the wording to reflect the wording shown in the highlights.	Changed to "May be inoperative for day (other than night) operations."
Ronald Jay Tubbs II, Spectrum Health Hospitals	05/15/20	34-10	?	We could not find MEL relief for the standby CDI, however this system is installed on all of our aircraft and does have the potential to fail.	Add MEL relief for the standby CDI (the S-76C RFM limitation on this system is that it must be functioning for single pilot IFR)	Relief for the CDI will be considered in the next MMEL revision.
Sikorksy	10/07/20	23-3	2312-01		Change items c) and d) to "0."	Changed items c) and d) to "0."
Sikorsky	10/07/20	23-4	2360-01		Change proviso to "May be inoperative."	Changed proviso to "May be inoperative."
Sikorksy	10/07/20	25-1	2510-03	The minimum requirements for Category "A" Packages for Elevated or Ground Level Helipads is defined within the RFMS.	Delete from MMEL.	DELETED.
Philip Whiting FTW AEG	10/27/20	25-1	2510-04		Change item name to "Direction Finder (DF) System" for consistency with other OEM aircraft.	Changed item name to "Direction Finder (DF) System" for consistency with other OEM aircraft.
Sikorsky	10/07/20	77-1	7700-03		Correct the STC number to SR01472NY.	Corrected the STC number to SR01472NY and included the relief from rev 10 into rev 12.