

# NOTICE

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

N 8900.219

National Policy

Effective Date:  
5/30/13

Cancellation Date:  
5/30/14

**SUBJ:** Changes to Master Minimum Equipment List Relief for Nose Gear Steering Systems and Aircraft Accessible Lavatories

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**1. Purpose of This Notice.** This notice directs aviation safety inspectors (ASI) to review all minimum equipment lists (MEL) for which they have oversight responsibility to ensure compliance with two recent Master Minimum Equipment List (MMEL) policy changes.

**2. Audience.** The primary audience for this notice is Flight Standards District Office (FSDO) and certificate management office (CMO) ASIs. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters (HQ).

**3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee Web site at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices). Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration's (FAA) Web site at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).

**4. Definitions.** The use of the term "aircraft operator" in this notice refers to those certificate holders, program managers, and foreign air carriers conducting aircraft operations under Title 14 of the Code of Federal Regulations (14 CFR) parts 91 subpart K (part 91K), 121, 125, 135, and 129, unless otherwise specified.

**5. Background.** The MMEL policy changes apply to nose gear steering systems in all aircraft with a tiller-bar steering system(s) and accessible lavatories in aircraft with more than one aisle.

**a. Nose Gear Steering Systems.**

(1) FAA MMEL policy allows for the consideration of relief for inoperative rudder pedal steering. This same policy, although not specifically stated, also gives relief for inoperative tiller-bar (tiller-wheel) steering systems. As a result, aircraft operators are allowed MEL relief for inoperative tiller-bar steering systems without adequate procedures and training in place to ensure an acceptable level of safety is maintained.

(2) A review conducted by the Air Transportation Division (AFS-200) found that when a tiller-bar steering system is inoperative, an aircraft operator maintains an acceptable level of safety only when a redundant tiller-bar steering system is available to allow for normal aircraft taxiing. FAA MMEL Policy Letter (PL)-114, Nose Gear Steering Systems (available through FSIMS), has been revised to clarify the issues associated with an inoperative tiller-bar steering system and to consider relief only when a redundant system is available.

**b. Accessible Lavatories.** Until recently, FAA MMEL policy applied specific relief requirements to accessible lavatories, as defined by 14 CFR part 382, Nondiscrimination on the Basis of Disability in Air Travel. FAA MMEL PL-128, Wheelchair Accessible Lavatories, defined these specific relief requirements in order to increase the availability of operable accessible lavatories to disabled individuals. However, a review conducted by the FAA Office of the Chief Counsel (AGC) found that part 382 is a Department of Transportation (DOT) regulation, and the FAA has no authority to require more restrictive MMEL relief for the items listed based on this regulation. Additionally, AGC found that the FAA has no authority to enforce compliance to this regulation per the current edition of FAA Order 1400.9, Americans with Disabilities Act and Rehabilitation Act Operating Procedures.

(1) As a result of AGC's review of part 382, PL-128, which identified more restrictive MMEL relief requirements, was rescinded. The MMEL relief requirements imposed by this PL no longer apply. ASIs will not use PL-128 in MMEL development or in aircraft operator MELs.

(2) Additionally, any MMEL or MEL relief allowed for lavatories, accessible or not, may be the same and cannot be based on part 382 requirements.

**Note:** Although the FAA has no authority or responsibility to enforce compliance with part 382, affected aircraft operators must comply with it. The DOT may enforce compliance with the regulation at any time.

**6. Action.** ASIs will review all MELs for which they have responsibility of oversight to ensure compliance with current FAA MMEL policy for nose gear steering systems and accessible lavatories. ASIs must ensure that aircraft operators revise MELs that do not accurately reflect current FAA policy within 60 days of the date of this notice as follows:

**a. Nose Gear Steering Systems.** Remove any and all MEL relief allowed for an inoperable tiller-bar steering system in aircraft with no redundant tiller-bar steering system. ASIs must assess the remaining steering system(s) using FAA MMEL PL-114, Revision 1, before approving any relief. AFS-200 strongly recommends that ASIs contact the Flight Operations Evaluation Board (FOEB) Chair for the specific aircraft make/model to ensure the correct assessment of the nose gear steering system before approving relief.

**b. Accessible Lavatories.** Remove all relief associated with part 382 accessible lavatory requirements. The lavatory relief allowed may be the same for accessible and non-accessible lavatories. AFS-200 strongly recommends that ASIs contact the FOEB Chair for the specific aircraft make/model to ensure compliance with this action.

**7. Disposition.** We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the New Program Implementation Branch (AFS-240) at 202-267-8166.

A handwritten signature in cursive script that reads "John M. Allen". The signature is written in black ink on a light blue rectangular background.

John M. Allen  
Director, Flight Standards Service