

FINAL COMMENT LOG

Originating Office: MKC-AEG		Document Title/Description: MMEL PA-46-600TP Rev 0, Piper Aircraft Inc., PA-46600TP		POC and Phone Number: Thomas L. Buffington, 603-514-4527		Suspense Date: 09/09/2022
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
James Driscoll AFS-280	4/20/22	V	Guidelines 21-20-02	<u>General</u> : Item (M), Sentence missing a period.	Add period to end of sentence.	Concur, will correct.
James Driscoll AFS-280	4/20/22	VI	Guidelines 21-30-01	<u>General</u> : Item (M), Sentence missing a period.	Add period to end of sentence.	In this case, it's an (O), but Concur, will correct.
James Driscoll AFS-280	4/20/22	VIII	Guidelines 21-40-01, B)	<u>General</u> : Item b), Sentence missing a period.	Add period to end of sentence.	Concur, will correct.
James Driscoll AFS-280	4/20/22	VIII	Guidelines 21-40-01, C)	<u>General</u> : Item b), Sentence missing a period.	Add period to end of sentence.	Concur, will correct.
James Driscoll AFS-280	4/20/22	25-2	25-20-00	<u>General</u> : Item -01, B), (M)(a) Is the proper term secure or secure(d)?	Review and correct if needed.	Concur, will correct. It should be "secured".
James Driscoll AFS-280	4/20/22	33-2	33-44-00	<u>Policy</u> : Item -04 does not conform with PL-072.	Review and update as needed to conform with PL-072.	Agree, Remarks are not verbatim, but the OEM states in their Justification: <i>"This relief is in line with Policy Letter 72 (verbiage about ground de-icing procedures not included as the M600 does not have any ground de-icing procedures)."</i> The FOEB Chair and OEM believes that including part b): of the PL would confuse Operators since Piper does not provide published ground de-ice procedures. The FOEB proposes to make the following modification in the Remarks: <i>May be inoperative provided aircraft is not operated in known or forecast icing conditions at night.</i> In this case, we are simply doing a cut and paste of the applicable part of PL-072.

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James Driscoll AFS-280	4/20/22	34-4	34-25-00	<u>Policy</u> : Item -08, (O) does conform to PL-072.	Review and update as needed to conform with PL-072.	After discussion with POC, it was clarified that the comment was a typo – should have been PL-054 – see next comment below as applicable.
James Driscoll AFS-280	4/20/22	34-4	34-25-08	<u>Policy</u> : Item -08 does not comply with PL-054.	Review and update as needed to conform with PL-054.	The M600 comes equipped with 5 Passenger Seats and 1 Pilot Seat, and therefore, is NOT required to have TAWS per 14 CFR 91.223. The aircraft comes with (2) options: TIS or TAWS B. The relief as submitted still follows applicable portions of PL-054 almost verbatim, but allows for less restrictive Repair Category since TAWS B is not required and is Optional.
James Driscoll AFS-280	4/20/22	34-8	34-55-00	<u>Policy</u> : Item -03, A), Column 1 category shows C rather than B, as per PL-105.	Review and update as needed to conform with PL-105.	Concur, FOEB Chair recommends replacing this portion of relief with a direct cut and paste of applicable section of PL-105 to include Repair Category, Remarks and Notes and (O) procedure..
James Driscoll AFS-280	4/20/22	34-8	34-55-00	<u>Policy</u> : Item -03, B), remarks do not conform to PL-105.	Review and update as needed to conform with PL-105.	Concur, we will change remarks to match PL and add NOTE: <i>"May be inoperative provided operations do not require its use."</i> <i>NOTE: Any ADS-B function that operates normally may be used."</i>
Robert Laurion AFS-330	*4/11/22	X	23-30-00	Section on Guidelines for (M) and (O) Procedures has 23-30-00 out of sequence. Should be after 22-30-02.	Relocate 23-30-00 after 22-30-02.	AEG Chair Concur – will correct.
Robert Laurion AFS-330	*4/11/22	XIV	34-50-03, A)	Section on Guidelines for (M) and (O) Procedures refers to 34-50-03, A) which is the wrong reference for ADS-B Out. The MMEL Sequence No. for ADS-B Out on page 34-8 is 34-55-03, A).	Change 34-50-03, A) to 34-55-03, A).	AEG Chair Concur – will correct.

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Robert Laurion AFS-330	*4/11/22	22-1	22-10-00	The section on Guidelines for (M) and (O) Procedures lists 22-10-00 which shows (M) and (O) procedure requirements. However, MMEL item 22-10-00 does not show the (M) and (O) symbols.	Add the (M) and (O) symbols to MMEL item 22-10-00.	AEG Chair Concur – will correct.
Robert Laurion AFS-330	*4/11/22	32-1	32-41-01	MMEL Sequence No. for Parking Brake shows 32-41-01. Should be 32-40-01.	Change 32-41-01 to 32-40-01.	AEG Chair Concur – will correct.
Robert Laurion AFS-330	*4/11/22	32-1	32-40-02	The section on Guidelines for (M) and (O) Procedures lists 32-40-02 which shows an (M) procedure requirement. However, MMEL item 32-40-02 does not show the (M) symbol.	Add the (M) symbol to MMEL item 32-40-02.	AEG Chair Concur – will correct.
Robert Laurion AFS-330	*4/11/22	33-2	33-44-04	The Wing Ice Light proviso does not contain the wording “ground deicing procedures do not require its use” as indicated in Policy Letter (PL) 72.	Shouldn't this PL wording be included?	Agree, Remarks are not verbatim, but the OEM states in their Justification: <i>“This relief is in line with Policy Letter 72 (verbiage about ground de-icing procedures not included as the M600 does not have any ground de-icing procedures).”</i> The FOEB Chair and OEM believes that including part b): of the PL would confuse Operators since Piper does not provide published ground de-ice procedures. The FOEB proposes to make the following modification in the Remarks: <i>May be inoperative provided aircraft is not operated in known or forecast icing conditions at night.</i> In this case, we are simply doing a cut and paste of the applicable part of PL-072.

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Robert Laurion AFS-330	*4/11/22	34-3	34-25-05, B)	The TCAS I proviso does not contain the wording "not required by 14 CFR" as indicated in PL-32 category C proviso.	Shouldn't this PL wording be included?	AEG Chair. Piper Aircraft has argued that since TCAS 1 is optional equipment and not required by 14 CFR, adding that statement might cause confusion. The Chair is OK with leaving it as, however, this it is not worth holding up the release of this MMEL. No change agreed per conversation with POC.
Robert Laurion AFS-330	*4/11/22	34-4	34-25-08	The MMEL item indicates Class B TAWS Equipment. When compared to PL-54 for Class B TAWS equipment the repair categories and proviso for several of the items don't reflect PL-54. PL-54, revision 7 entry indicates aircraft equipped with TAWS not required by 14 CFR, the repair interval category C will be assigned for sstem/systems.	Varification the repair categories and proviso requirements are correct in relation to PL-54.	AEG Chair – No Change. The M600 comes equipped with 5 Passenger Seats and 1 Pilot Seat, and therefore, is NOT required to have TAWS per 14 CFR 91.223. The aircraft comes with (2) options: TIS or TAWS B. The relief as submitted still follows applicable portions of PL-054 almost verbatim, but allows for less restrictive Repair Category since TAWS B is not required and is Optional.
Robert Laurion AFS-330	*4/11/22	34-8	34-55-03, A)	The ADS-B Out Extended Squitter Transmissions shows a C Repair Category with 0 Required for Dispatch with a proviso that requires obtaining authorization from ATC and it is not required by 14 CFR. The proviso doesn't make sense. If 0 required for dispatch, why would you need to get authorization from ATC if it is not required by 14 CFR. This proviso is different when compared to PL 105 for ADS-B Out Extended Squitter. It appears PL-105 Category B proviso was mixed with the Category D proviso b).	Shouldn't there be a separate B category proviso obtaining authorization from ATC and separate D category proviso if it is not required by 14 CFR as contained in PL-105?	AEG Chair Concur – will change portion of relief with a direct cut and paste of applicable section of PL-105 to include Repair Category, Remarks and Notes and (O) procedure.

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Robert Laurion AFS-330	*4/11/22	34-8	34-55-03, B)	The ADS-B In Transmissions proviso does not contain the wording "provided operations do not require its use" and the Note as indicated in PL-105 for ADS-B In.	Shouldn't this PL wording be included?	AEG Chair Concur - will change remarks to match PL and add NOTE: <i>"May be inoperative provided operations do not require its use."</i> <i>NOTE: Any ADS-B function that operates normally may be used."</i>
David M. Persky AEG (CE-60)	06/13/22	IV	-	Updated DEFINITIONS and PREAMBLE: Change FSIMS to DRS.	Change FSIMS to DRS	AEG Chair – Done.
David M. Persky AEG (CE-60)	06/13/22	XIII	32-40-01	For Standardization and Consistency, go with POH	Change POH/AFM to POH	AEG Chair – Done.
David M. Persky AEG (CE-60)	06/13/22	XIII	32-40-02	For Standardization and Consistency, List (M) procedure first	Move (M) procedure to top.	AEG Chair – Done.
David M. Persky AEG (CE-60)	06/13/22	34-3	34-25-05, A:	TIS or TCAS I – only one system is available.	Add *** to A) TIS.	AEG Chair – Done.
David M. Persky AEG (CE-60)	06/13/22	80-1	80-00-01	For Standardization and Consistency, go with POH	Change AFM to POH	AEG Chair – Done.
Mitch Canon Piper Aircraft, Inc.	06/15/22	X	22-30-01	Better to refer system as Auto Brake	Change "Auto Brakes" to "Auto Brake"	AEG Chair – Corrected.
Mitch Canon Piper Aircraft, Inc.	06/15/22	XIII	32-04-02	Better to refer system as Auto Brake	Change "Auto Brakes" to "Auto Brake"	AEG Chair – Corrected.
Mitch Canon Piper Aircraft, Inc.	06/15/22	XIV	34-55-03	Change (M) and (O) Procedures ANS provider reference to ATC facilities having jurisdiction to better align with verbiage from PL-105.	Replace "ANS provider (s)" with "ATC facilities having Jurisdiction"	AEG Chair – Corrected.

*Note: AEG Chair did not receive Comments until 05/26/22.