FINAL COMMENT LOG

Originating Office:

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SEA-AEG

MMEL A-320 Rev 30, Airbus SAS, A318, A319, A320, and A321 Series, All Models

John D. Elovich, 206-231-3721

05/012023

Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
James Driscoll AFS-280	6/14/22	25-20	25-60-08, a)	rmains is misspelled in the remarks column.	Correct the spelling to remains	Concur. Corrected spelling.
James Driscoll AFS-280	6/14/22	26-18	26-26-24	Inoperastive is misspelled in the remarks column NOTE:	Correct the spelling to Inoperative	Concur. Corrected spelling
Robert Laurion AFS-330	5/31/22	23-3	Item # 23-12-01, 3)	Item refers to COM VHF 1(2)(3); however, column 4 proviso only refers to COM VHF 2(3).	Recommend determining if referring to COM VHF 1 in the Item needs to be removed or if it needs to be added as part of the proviso.	Concur. Added 1 to proviso.
Robert Laurion AFS-330	5/31/22	25-10	Item # 25-28-01	The Item addresses bins, compartments and closets. Column 4 proviso para. b) leaves out closet. Proviso para. c) and d) leaves out bin and closet.	Recommend para. b), c) and d) refer to bin, compartment and closest as indicated in Policy Letter (PL) 104.	Concur. Updated to match Policy Letter (PL) 104.
Robert Laurion AFS-330	5/31/22	25-21	Item # 25-60-13, 1), Repair Category A	Column 4 proviso para. a) has the word "and" at the end of para. a). Proviso Note has the word "requirement" misspelled in the last sentence of the Note.	Recommend removing the "and" at the end if para. a). Recommend correcting the spelling of "requirement."	Concur. Corrected misspelling and removed "and" at the end of paragraph a.
Robert Laurion AFS-330	5/31/22	25-22	Item # 25-60-13, 2), Repair Category A	Column 4 proviso para. a) has the word "and" at the end of para. a). Proviso Note has the word "requirement" misspelled in the last sentence of the Note.	Recommend removing the "and" at the end if para. a). Recommend correcting the spelling of "requirement."	Concur. Corrected misspelling and removed "and" at the end of paragraph a.
Robert Laurion AFS-330	5/31/22	25-23	Item # 25-60-13, 3), Repair Category A	Column 4 proviso Note has the word "requirement" misspelled in the last sentence of the Note.	Recommend correcting the spelling of "requirement."	Concur. Corrected spelling.
Robert Laurion AFS-330	5/31/22	32-19	Item # 32-48-03	Noticed column 4 is blank for this item.	Recommend adding the phrase "May be inoperative" to be consistent with other parts of the MMEL where the phrase was added.	Concur but it's actually 02 that has the error.
Robert Laurion AFS-330	6/1/22	34-11	Item # 34-13-11	Column 1 contains a dash for Repair Category for one of the 4 provisos listed in column 4.	Recommend adding an appropriate repair category letter in place of the dash.	Concur. Added category "C" as repair category.

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Robert Laurion AFS-330	6/1/22	34-14	Item # 34-30-01	Noticed column 4 is blank for this item.	Recommend adding the phrase "One or more may be inoperative" to be consistent with other parts of the MMEL where the phrase was added.	Concur.
Robert Laurion AFS-330	6/1/22	34-21	Item # 34-48-01, 6)	Since there is only 1 installed, column 4 should just say "May be inoperative."	Recommend changing from "One may be inoperative" to "May be inoperative."	Concur.
Robert Laurion AFS-330	6/1/22	35-5	Item # 35-31-01	Column 4 proviso contains the (M) symbol; however, PL 132 does not indicate an (M) symbol. Proviso para. a) and Note 1 contain the word "certificed" instead of the word "certified." Note 2 contains the words "tot hat" instead of "to that."	Recommend ensuring (M) symbol is necessary and appropriate. Recommend correcting para. a) and Note 1 to the word "certified" in the sentences. Recommend correcting Note 2 to the wording "to that" in the sentence.	FOEB has ensured that M procedure designator is adequately placed for this procedure. Typo's corrected.
Robert Laurion AFS-330	6/1/22	49-3	Item # 49-70-03	Noticed column 4 is blank for this item.	Recommend adding the phrase "May be inoperative" to be consistent with other parts of the MMEL where the phrase was added.	Concur. Added "May be inoperative".
Robert Laurion AFS-330	6/1/22	52-2	Item # 52-30-01, 1)	The (M) symbol was removed; however, the proviso requires performance of Inspection Service Bulletin (ISB) 52-1070.	Recommend verifying that removing the (M) symbol is appropriate.	Concur. Removed the (M) symbol.
Robert Laurion AFS-330	6/2/22	79-2	Item # 79-33-02 Note	Acronym "pdsw" should be "pd-sw" as indicated in the List of Acronyms.	Recommend changing to "pd-sw" for consistency.	Concur changed to pd-sw.
Jamelle Poppe, AFS-830	6/10/22	22-11	22-81-04(3)	Number installed is listed without the number required for dispatch.	List the number required for dispatch (0?)	Concur. Added 0 for number required for dispatch.

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Benjamin Woods Hawaiian Airlines	6/7/22	30-1	30-30-00, 1)	The deferral for the "CLASS II MAINTENANCE MESSAGES DISPLAYED ON ECAM STATUS PAGE OF ECAM SYSTEM DISPLAY 1) Fault(s) Indicated by ICE DETECT" has a repair category of "C" in the FAA MMEL. However, this same item has a repair category of D in the EASA MMEL. Additionally, the Ice Detectors are optional equipment. This Class II Maintenance message is triggered via one root cause, a single Ice Detector fault. Therefore, the single Ice Detector fault can be deferred using this MEL item. However, the entire Ice Detection System (i.e., fault of both ice detectors) can be deferred via MMEL item 30-81-02. The deferral of the entire system has a repair category of D. Therefore, it does not seem to make sense that one ice detector can only be deferred for 10 days (with the remaining ice detector continuing to function) via the class II maintenance message, while the entire system can be deferred for 120 days.	Please align with the EASA MMEL by changing the repair category to "D" (120 days) for the Class II maintenance message for the ICE DETECT fault.	Concur. Updated the MMEL to alight with EASA.

Benjamin Woods Hawaiian Airlines	6/10/22	26-1	26-12-01, 1) and 26-12-01, 2)	The deferral for "Engine Fire Detection Systems" 1) Loop A and or 2) Loop B restricts operation for ETOPS beyond 120 minutes.	Based on the A320 System Technical description we would like to propose the allowance for the FAA MMEL to be aligned with the EASA MMEL for the	Non-Concur Does not aligh with PL-40
			26-12-01, 2)		allowance for the FAA MMEL to be aligned with the EASA MMEL for the Engine Fire Detection Loops. We also propose alignment with the EASA MMEL by allowing relief beyond ETOPS 120 for Loop B on Engine 1 (reference EASA MMEL 26-12-03A), and for Loop A on Engine 2 (reference EASA MMEL 26-12-02A).	Does not aligh with PL-40 May be considered for future revision if FOEB is provided with substansiaton of system design enhancements or improvements in system reliability.
				In case of ETOPS operation, according to the mentioned above, with the EMER ELEC configuration (power will be supplied on AC/DC ESS bus only), the Engine Fire Detection Loop B on Engine 1 and Loop A on Engine 2 are no more powered because they are not connected to DC ESS bus. Only Engine Fire Detection Loop A on Engine 1 and Loop B on Engine 2 remain available. Therefore, in order to prevent the loss of Engine Fire Detection Loop function in the worst ETOPS emergency configurations, ETOPS beyond 120 min must not be conducted in case of dispatch with the Engine Fire Detection Loop A on Engine 1 inoperative (EASA MMEL 26-12-01A) or Engine Fire Detection Loop B on		

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				Engine 2 inoperative (EASA MMEL 26-12-04A). In addition, please also be informed that the Engine Fire Detection Loop A and Loop B on each engine are in redundancy. For example, if Engine Fire Detection Loop A on Engine 1 is failed or Engine Fire Detection Loop A on Engine 2 is failed, Loop B on Engine 1 or Loop B on Engine 2 must be operative respectively. In the same manner, if Engine Fire Detection Loop B on Engine 1 is failed, Loop A on Engine 1 must be operative. This behavior is adapted for Engine Fire Detection Loops on Engine 2 as well. However, the dispatch conditions EASA MMEL 26-12-04A do not mention that the redundant Engine Fire Detection Loop has to be operative because the MMEL does not cross-refer for redundant systems."		
Tim.Kane@ jetblue.com	7/11/22	79-18	79-35-05, 2)	OIL CHIP DETECTED Caution on ECAM EWD (Cont'd) 2) PW 1100G Engines with Mod. 167244/ MP P21270 (FCS 6.0) uses the term "inoperative' which is in error. The OEM MMEL uses the term One may be displayed. This is because the ODM system is providing early warning that oil debreis are detected. This is not an inoperative condition.	Harmonize with Airbus OEM MMEL 79-09-06 One may be displayed	Concur. Updated item.

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Tim.Kane@ jetblue.com	7/11/22	79-17	79-35-05, 1)	79-35-05 OIL CHIP DETECTED Caution on ECAM EWD 1) PW 1100G Engines without Mod. 167244/ MP P21270 (FCS 6.0) uses the term "inoperative" in the series of exceptions, which is in error. The OEM MMEL uses the term One may be displayed. This is because the ODM system is providing early warning that oil debreis are detected. This is not an inoperative condition.	Harmonize with Airbus OEM MMEL 79-09-06 One may be displayed	Concur. Updated item.
Tim.Kane@ jetblue.com	7/11/22	79-15, 79-16	79-35-04, 6)	79-35-04 OIL SENSOR FAULT Caution on ECAM EWD (Cont'd) 6) PW 1100G with Mod. 167244/MP P21270 (FCS 6.0) and with Mod. 162159/MP P20466 (FWC H2-F10) (Cont'd) uses the term "inoperative' in the series of exceptions, which is in error. The OEM MMEL uses the term One may be displayed. This is because the oil system is providing early warning that oil filter is partially clogged. This is not an inoperative condition.	Harmonize with Airbus OEM MMEL 79-09-05 One may be displayed	Concur. Changed inoperative to displayed for 79-35-04.
Tim.Kane@ jetblue.com	7/11/22	79-14	79-35-04, 5)	79-35-04 OIL SENSOR FAULT Caution on ECAM EWD (Cont'd) 5) PW 1100G with Mod. 167244/ MP P21270 (FCS 6.0) and without Mod. 162159/ MP P20466 (FWC H2-F10) uses the term "inoperative' in the series of exceptions, which is in error. The OEM MMEL uses the term One may be displayed. This is because the oil system is providing early warning that oil filter is partially clogged. This is not an inoperative condition.	Harmonize with Airbus OEM MMEL 79-09-05 One may be displayed	Concur. Changed inoperative to displayed for 79-35-04.

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Tim.Kane@ jetblue.com	7/11/22	25-20	25-60-08	Flashlight and Holders (Flight Deck or Cabin): PL-132 combines PLs 43, 47, 73, and 75 regarding emergency equipment. It does not eliminate the remarks or exceptions provided by PL-125 Equipment Relief without Passengers. In this case Pl-132 would add a new set of exceptions not eliminate the existing from PL-125. It is imperitive that PL-125 remarks or exceptions are retained. Providing MMEL relief for these items allows operators the ability to position aircraft to another location and still carry cargo, crew members and other authorized persons I.A.W. 14CFR as referenced in PL-125	C / - / 0 (O) May be inoperative or missing provided: a) No passengers are carried, b) A maximum of 19 persons authorized by 14 CFR for non-passenger-carrying operations are carried, and c) Alternate procedures are established and used. C / - / - May be inoperative or removed provided: a) Crewmember assigned to the affected position has an equivalent operative flashlight readily available, b) Inoperative flashlight remains in a certified location or is removed form the aircraft, and c) Location placarding is removed or obscured. D / - / - Any in excess of those required by 14 CFR may be inoperative or removed provided: a) Inoperative flashlight rmains in a certified location until removed from the aircraft at the next suitable maintenance facitlity, and b) Location placarding is removed or obscured.	Non Concur. Will consider for Rev 31 when proposal is sent.

Tim.Kane@ 7/11/22 25-20 25-60-09 Megaphones: PL-132 combines PLs C / - / 0 (O) May be inoperative or missing Non Concur. Will consider
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Tim.Kane@ jetblue.com	7/11/22	78-2	78-30-01	78-30-01 THRUST REVERSER SYSTEMS 1) (A318/A319ceo/A320ceo/A321ceo) PROVISO d) ENG 1 (2) REV INHIBITED caution is displayed on ECAM E/WD after deactivation (PW 6000 only) The OEM MMEL does not have effectivity to PW 6000 only. Jetblue A320ceo w/ IAE display this message.	Harmonize with Airbus OEM MMEL 78-30-01 Operational procedures.	Concur. Removed (PW 6000 only.
Pete Moll United	8-1-22	21-1	21-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 21-00-00.	Concur.
Pete Moll United	8-1-22	21-25	21-62-02	Did not add "One may be inoperative" as a proviso.	Recommend adding: "One may be inoperative". For the proviso.	Concur added "one may be inoperative".
Pete Moll United	8-1-22	23-1	23-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 23-00-00.	Concur.
Pete Moll United	8-1-22	24-1	24-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 24-00-00.	Concur.
Pete Moll United	8-1-22	24-5	24-20-01-03	The Cat B 2 1 should not be here on this page, since this is a continuation from the previous page.	Recommend removing the Cat B 2 1 from this item on this page.	Concur. Removed the Cat B 2 1.
Pete Moll United	8-1-22	25-26	25-65-02	Did not add "May be inoperative or missing" as a proviso.	Recommend adding "May be inoperative or missing" as a proviso.	Concur. Added One or more maybe damaged or missing.
Pete Moll United	8-1-22	26-1	26-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 26-00-00.	Concur.
Pete Moll United	8-1-22	27-1	27-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 27-00-00.	Concur.
Pete Moll United	8-1-22	28-1	28-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 28-00-00.	Concur.
Pete Moll United	8-1-22	29-1	29-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 29-00-00.	Concur.

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Pete Moll United	8-1-22	30-1	30-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 30-00-00.	Concur.
Pete Moll United	8-1-22	31-1	31-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 31-00-00.	Concur.
Pete Moll United	8-1-22	31-3	31-31-00-08	Possibly recommend changing this item to the following, (for clarity, and ease of use for all the MMEL and MEL users): CAT A Proviso: May be displayed on ECAM STATUS page provided FDR Recording Parameters Required by 14 CFR is considered inoperative. NOTE: Refer to MMEL item 31-30-02 1) FDR Recording Parameters Required by 14 CFR. NOTE: Dispatch with maintenance status message displayed on ECAM is permitted without CFDS interrogation.	Possibly recommend changing this item to the following, (for clarity, and ease of use for all the MMEL and MEL users): CAT A Proviso: May be displayed on ECAM STATUS page provided FDR Recording Parameters Required by 14 CFR is considered inoperative. NOTE: Refer to MMEL item 31-30-02 1) FDR Recording Parameters Required by 14 CFR. NOTE: Dispatch with maintenance status message displayed on ECAM is permitted without CFDS interrogation.	Concur. Updated item.
Pete Moll United	8-1-22	32-1	32-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 32-00-00.	Concur
Pete Moll United	8-1-22	32-19	32-48-02	Did not add "May be inoperative" as a proviso.	Recommend adding "May be inoperative" as a proviso.	Concur. Added May be inoperative.
Pete Moll United	8-1-22	33-10	33-50-06	UAL has been informed by Airbus that the A321-271NX and A321-271NY aircraft do not have Lavatory Auxiliary Lights. Therefore, it appears that this item should now have the triple asterisk symbol. ***	Recommend that item 33-50-06 has the triple asterisk added, since not all aircraft have this system. ***	Concur Added astricks.
Pete Moll United	8-1-22	33-10	33-50-08	The proviso should state: May be inoperative (And not: One or Both may be inoperative).	Revise the proviso to state: May be inoperative.	Concur. Updated to read May be inoperative.
Pete Moll United	8-1-22	34-1	34-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 34-00-00.	Concur.

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Pete Moll United	8-1-22	34-14	34-30-01	Did not add "May be inoperative" as a proviso.	Recommend adding "May be inoperative" as a proviso.	Concur. Added "One or more may inoperative."
Pete Moll United	8-1-22	35-1	35-10-04	Recommend changing the No. Installed here be a dash (-). Since there are some aircraft, such as A321's with "two" crew bottles and "two" Green Discs.	Recommend changing the Number Installed to a dash (-).	Concur. Changed number installed to a dash
Pete Moll United	8-1-22	36-1	36-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 36-00-00.	Concur. Updated numbering.
Pete Moll United	8-1-22	36-14	36-12-02-02, C (Third proviso set, Cat A item)	Should the (M) be here on this item? Is this necessary? It doesn't appear that the AMM has a specific task for this in the 'Open' position? Also, the Airbus MMEL doesn't have an associated item for 'Open', or an AMM referred to as such.	Recommend removing the (M) symbol for this item.	Concur. Removed the (M) symbol.
Pete Moll United	8-1-22	46-1	46-20-01-01 46-20-01-02 46-20-01-03 46-20-01-04	Recommend incorporating FAA MMEL PL-121, Rev.1 into all of these EFB items.	Recommend incorporating FAA MMEL PL-121, Rev.1 into all of these EFB items.	Concur. Updated to match PL-121.
Pete Moll United	8-1-22	46-2	46-21-03	Recommend this "Item" be changed to: ATC MSG pb-sw (To match most of the other similar items like this in this MMEL? And, to also more closely match the acronym list at the beginning of this MMEL).	Recommend this "Item" be changed to: ATC MSG pb-sw (To match most of the other similar items like this in this MMEL? And, to also more closely match the acronym list at the beginning of this MMEL).	Concur. Updated to pb-sw.
Pete Moll United	8-1-22	47-1	47-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 47-00-00.	Concur. Made this a 6 digit sequence number
Pete Moll United	8-1-22	49-1	49-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 49-00-00.	Concur. Made this a 6 digit sequence number
Pete Moll United	8-1-22	49-2	49-30-01A (Second proviso set, Cat A item)	Is it necessary for there be an (O) symbol here for this item? There doesn't appear to be an (O) procedure in the Airbus MMEL?	Recommend removing the (O) symbol for this item.	Concur. Removed the (O).
Pete Moll United	8-1-22	49-3	49-70-03	Did not add "May be inoperative" as a proviso.	Recommend adding "May be inoperative" as a proviso.	Concur

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Pete Moll United	8-1-22	71-1	71-00	Class II messages only has 4 digit sequence numbers vs rest of this chapter.	Recommend making this in the 6 digit sequence numbers to be consistent with the other chapters, example: 71-00-00.	Concur
Pete Moll United	8-1-22	Chapter 73	Various	It was noted that several chapter 73 "Items" language was changed from: "ECAM E/WD" to "ECAM EWD". However, not all chapter 73 Items were changed like this. Also, Note that there are several other chapters where this is not used consistently. It would be nice if this could be used consistently throughout all chapters, and also be listed in the "Acronyms List" at the beginning of this MMEL.	It is recommended that all chapter 73 items be revised from: ECAM E/WD" to: "ECAM EWD", and then consider revising all other chapters that are not consistent like this as well. Also, it is recommended that this be added to the "Acronyms List" at the beginning of this MMEL document.	Concur. Changed all ECAM E/WD to ECAM EWD.
Pete Moll United	8-1-22	73-3		Within the proviso sets for both of these items, it states: (M) One may be inoperative provided associated filter is changed before the next flight and then once each flight-day. (M) One may be inoperative provided associated filter is changed before the next flight and then once each flight-day or every 15 flight-hours, whichever occurs first.	Recommend changing the words "changed" to "replaced", examples: (M) One may be inoperative provided associated filter is replaced before the next flight and then once each flight-day. (M) One may be inoperative provided associated filter is replaced before the next flight and then once each flight-day or every 15 flight-hours, whichever occurs first.	Concur. Updated "changed" with "replaced"
Pete Moll United	8-1-22	78-3	78-30-01-01	The Cat C 2 1 should not be here on this page, since this is a continuation from the previous page.	Recommend removing the Cat C 2 1 from this item on this page.	Concur. Removed Cat C 2 1
Pete Moll United	8-1-22	78-4	78-30-01-02	The "Item" language on this page at the end, example: "with CFM LEAP-1A Engines)" doesn't match the "Item" language from the previous page 78-3.	Please verify if the "with CFM LEAP-1A Engines)" needs to be here at the end of this "item"? It is not on the previous page 78-3. Remove this if warranted.	Concur. Removed "CFM LEAP- 1A"
Pete Moll United	8-1-22	78-7	78-30-01-04	The Cat C 2 1 should not be here on this page, since this is a continuation from the previous page.	Recommend removing the Cat C 2 1 from this item on this page.	Concur. Removed C-2-1
Pete Moll United	8-1-22	78-8	78-30-01-05	The Cat C 2 1 should not be here on this page, since this is a continuation from the previous page.	Recommend removing the Cat C 2 1 from this item on this page.	Concur. Removed C-2-1

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Pete Moll United	8-1-22	78-9	78-31-01-01	Would it be possible to just state that the associated Thrust Reverser is considered inoperative? And then provisos b, c, and d and Note 2 would not be needed here, and would be taken care of, and handled by applying the associated Thrust reverser MEL.	Would it be possible to just state that the associated Thrust Reverser is considered inoperative? And then provisos b, c, and d and Note 2 would not be needed here, and would be taken care of, and handled by applying the associated Thrust reverser MEL.	Non Concur. Will consider for Rev 31 when proposal is sent.
Pete Moll United	8-1-22	78-10	78-31-01-02	Would it be possible to just state that the associated Thrust Reverser is considered inoperative? And then provisos a, b, and c, and the Note would not be needed here, and would be taken care of, and handled by applying the associated Thrust reverser MEL.	Would it be possible to just state that the associated Thrust Reverser is considered inoperative? And then provisos a, b, and c, and the Note would not be needed here, and would be taken care of, and handled by applying the associated Thrust reverser MEL.	Non Concur. Will consider for Rev 31 when proposal is sent.