

## FINAL COMMENT LOG

Originating Office: <b>AFS-140</b>		Document Title/Description: <b>MMEL AB-139 Rev 5, Leonardo S.p.A. AB139, AW139</b>			POC and Phone Number: <b>Roscoe Armstrong, 817-888-6664</b>		Suspense Date: <b>05/08/2023</b>
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response	
David Ryon AFS-280	2/15/23	33-2	3340-01 Position Light System	General: There is potentially a brief period (morning civil twilight and evening civil twilight) where compliance could be compromised with the current wording. See 91.209(a)(1)	Suggest:  May be inoperative for VFR operations from sunrise to sunset.	Concur, has been changed.	
David Ryon AFS-280 NONCONCUR	12/15/22	XIV	3412-02	General: Procedure may be able to be clarified	After considering the intent:  (O) Procedure to determine when to deactivate ice detector function of OAT.  Or  (O) Procedure to determine when ice detector function of OAT has been deactivated.	Concur. Added second recommendation.	
David Ryon AFS-280 NONCONCUR	12/15/22	XIV	3457-03 and 3457-04	General: Both Procedures can likely be clarified	Consider:  (O) Depending on the Primus Epic SW and HW installed, procedures preventing RNAV RNP operations are available.	Concur. Modified	
David Ryon AFS-280 NONCONCUR	12/15/22	21-1	2120-01	Policy: Cockpit Ventilation Flapper Valve proviso can be in one sentence	Consider:  May be inoperative provided heating system is installed and operational.	Remains as is as provided by OEM.	
David Ryon AFS-280 NONCONCUR	12/15/22	21-1	2121-01	Policy: Cockpit Ventilation Fan proviso can be in one sentence	Consider:  (O) May be inoperative provided the respective Cockpit Ventilation Flapper Valve is operative.	Remains as is as provided by OEM.	
David Ryon AFS-280 NONCONCUR	12/15/22	21-3	2120-03	Policy: Proviso b) can likely be clarified	Consider:  b) Vent Switch is selected to RAM position,	Concur	

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David Ryon AFS-280 NONCONCUR	12/15/22	21-4	2140-08	General: Proviso b) can likely be clarified	Consider:  Wording such as – (Name) selector is set to VENT or RAM.	Remains as is.
David Ryon AFS-280 NONCONCUR	12/15/22	23-1	2300-01	General: NOTE 2 can likely be clarified	Consider:  When audio panel 1 or 2 has been reverted to back-up mode, affected side audio tones and voice warnings cannot be heard.	Concur
David Ryon AFS-280 NONCONCUR	12/15/22	23-1	2300-04	General: NHEC can be clarified in proviso	Consider:  Spelling it out, or NHEC can be added to the definitions at the front of the document with explanation (PAGE NO. IX) Also HEC could be added.	Concur
David Ryon AFS-280 NONCONCUR	12/15/22	23-3	2312-01	General: "Basic" can be removed from item name	Consider:  Communications Systems (VHF)	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	25-3	2520-04	Policy: "The" can be removed for simplicity in a) proviso  (Several others in document can also be removed per PL 31 guidance)	Consider:  a) System is deactivated and secured, and	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	25-4	2550-06	Policy: Provisos can be combined for clarity	Consider:  May be inoperative or missing Provided:  a) Cargo compartment remains empty, and b) Repairs are made within 120 consecutive calendar-days or at the next scheduled maintenance check, whichever comes first.	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	30-1	3030-01	Regulatory: First set of C Repair Category limitations would allow flight in IMC with potential icing	Consider: Removing first C Repair Category limitations and keep second set with VFR only provisos	Concur

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David Ryon AFS-280 NONCONCUR	12/20/22	30-2	30-60-01	Policy: Repair Category A Provisos can be combined for clarity (PL 31)	Consider:  May be inoperative (TR DEGR illuminated) for one flight-day to a location where repairs can be made provided dispatch in icing condition is not allowed from a location where repair is possible.	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	31-1	3160-01	Policy: Repair Category A Provisos can be combined for clarity (PL 31)	Consider:  One co-pilot display may be inoperative for dual pilot operations provided the standby instrument is operative.	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	32-1	3240-01	General: Provisos can be shortened slightly for clarity	Consider:  (O) May be inoperative provided: a) Category A operations requiring use of parking brake are not conducted, b) Slope operations requiring parking brake are not conducted, and c) Aircraft is not dispatched with PARK BRK ON caution displayed.	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	33-2	3310-02	Policy: Provisos reference day, but it is not defined in part 1	Consider:  (M) May be inoperative for operations from sunrise to sunset provided Overhead map lights are deactivated and secured.  As an alternate you could add in a definition for day in the MMEL  Day - the time period from Sunrise to sunset	Concur using FAA definition of Day which is other than night.
David Ryon AFS-280 NONCONCUR	12/20/22	33-2	3320-01	Policy: C Repair Category provisos reference day, but it is not defined in part 1	Consider:  May be inoperative for operations from sunrise to sunset.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur using other than night.

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David Ryon AFS-280 NONCONCUR	12/20/22	33-2	3320-01	General: Suggest a second C Repair Category be assigned to the Night operations provisos and remove two "the" per PL 31	Consider:  C May be inoperative for night operations provided that inoperative lights do not exceed fifty (50) % of total installed.	Concur
David Ryon AFS-280 NONCONCUR	12/20/22	33-2	3340-01	Policy: C Repair Category item provisos reference day, but it is not defined in part 1	Consider:  May be inoperative for operations from sunrise to sunset.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur, other than night added
David Ryon AFS-280 NONCONCUR	12/20/22	33-2	3340-02	Regulatory: Anti-Collision Light is required for all operations (91.209(b))	Remove from MMEL, or if Strobe Light System, Beacon, Pulse Light System, Landing Lights System, and Position Light System, or any combination of them, meet the requirements of the Anti-Collision Light System, arrange those items in to the relief, as required operative and used.	Concur, Removed and revised numbering.
David Ryon AFS-280 NONCONCUR	12/21/22	33-2	3340-05	Policy: First C Repair Category item provisos reference day, but it is not defined in part 1	Consider:  May be inoperative for operations from sunrise to sunset.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur, added other than night.
David Ryon AFS-280 NONCONCUR	12/21/22	33-3	3340-06	Policy: First C Repair Category item provisos reference day, but it is not defined in part 1	Consider:  May be inoperative for operations from sunrise to sunset.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur, added other than night

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David Ryon AFS-280 NONCONCUR	12/21/22	33-3	3340-07	Policy: First C Repair Category item provisos reference daylight, but it is not defined in part 1	Consider:  (M) May be inoperative for operations from sunrise to sunset provided the system is deactivated and secured.  As an alternate you could add in a definition for daylight in the MMEL -  Daylight - the time period from Sunrise to sunset	Concur, added other than night
David Ryon AFS-280 NONCONCUR	12/21/22	33-3	3340-08	Policy: First C Repair Category item provisos reference daylight, but it is not defined in part 1	Consider:  (M) May be inoperative for operations from sunrise to sunset provided the system is deactivated and secured.  As an alternate you could add in a definition for daylight in the MMEL -  Daylight - the time period from Sunrise to sunset	Concur, added other than night
David Ryon AFS-280 NONCONCUR	12/21/22	33-3	3340-09	Policy: C Repair Category item provisos reference day, but it is not defined in part 1	Consider:  May be inoperative for operations from sunrise to sunset.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur, added other than night.
David Ryon AFS-280 NONCONCUR	12/21/22	34-1	3412-02	Policy: Repair Category A Provisos can be combined for clarity and alignment with PL 31	Consider:  (O) One of the ADS sensors may be inoperative for one flight-day provided dispatch in icing conditions is not conducted from a location where repair is possible.	Concur

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David Ryon AFS-280 NONCONCUR	12/21/22	34-1	3420-01	Policy: Repair Category A Provisos should contain a time period limit	Consider:  (O) May be inoperative for X flight day(s) provided: a) RFM limitations and RFM procedures are followed, and b) The non-affected AHRS is selected on the Reversionary Control Panel.	Concur
David Ryon AFS-280 NONCONCUR	12/21/22	34-1	3421-01	Policy: Repair Category A Provisos should contain a time period limit and may be clarified and shortened slightly	Consider:  May be inoperative for X flight day(s) provided: a) Flights are restricted to VFR, b) Pilot must fly attentive, c) RFM limitations applicable to AFCS DEGRADED system state are followed, and d) Aircraft is not dispatched from a location where repair is possible.	Concur
David Ryon AFS-280 NONCONCUR	12/21/22	34-2	3421-02	Policy: B Repair Category item provisos reference day, but it is not defined in part 1	Consider:  May be inoperative provided: a) Only VMC operations are conducted from sunrise to sunset, and b) Operations are not conducted into known or forecast over-the-top conditions.  As an alternate you could add in a definition for day in the MMEL -  Day - the time period from Sunrise to sunset	Concur Other than night added.
David Ryon AFS-280 NONCONCUR	12/21/22	34-2	3422-01	General: Suggestion to add clarity and add time frame limit for A item	Consider:  One may not be calibrated for X flight day(s) provided: a) VFR operations are conducted, b) Special flight permit necessary to reach the repair location is obtained and used, c) HDG miscompare amber message is not displayed, and d) Standby Magnetic Compass is operative.	A special flight permit is required and will limit to the SFP flight. Added other than night.

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David Ryon AFS-280 NONCONCUR	12/21/22	34-2	3423-01	Item proviso references day, but it is not defined in part 1	Consider:  May be inoperative provided flight is conducted under VFR from sunrise to sunset while navigating with reference to visual landmarks.	Concur, Other than night added
David Ryon AFS-280 NONCONCUR	12/21/22	34-4	3444-02	Policy: For clarity and alignment with PL 31 add in first requirement as a proviso	Consider:  (M) One may be inoperative provided: a) 4 axis Flight Director mode RHT is not engaged, b) System is deactivated and secured, and c) It is not required for the intended mission.	Concur
David Ryon AFS-280 NONCONCUR	12/22/22	34-8	3455-01	Policy: "or" can be removed between the C Repair Categories	Remove "or" for standardization and PL 31 guidance	Concur
David Ryon AFS-280 NONCONCUR	12/22/22	34-8	3457-02	General: Consider adding "H/C" to definitions section in the MMEL	Add "H/C" to definitions section in the MMEL	Per OEM
David Ryon AFS-280 NONCONCUR	12/22/22	34-8	3457-03	Policy: For first C Repair Category a) proviso, consider listing equipment required operative by specific name	Consider: Listing equipment required by specific item name per PL 31 guidance	Per OEM
David Ryon AFS-280 NONCONCUR	12/22/22	34-9	3457-04	General: Provisos can be slightly simplified for clarity, and suggest listing required operative items by name in provisos	Consider: (or similar)  (M) One GPS may be inoperative provided: a) RNP APCH to LPV minima is not conducted, b) RNP 0.3 all phases of flight and RNP AR APCH RNP 0.3 minima operations are not conducted, c) XXXX, XXXX, Flight Directors and XXXX are operative, and d) FMS database is current.	Per OEM
David Ryon AFS-280 NONCONCUR	12/22/22	71-1	7160-01	General: Suggest for second A Repair Category, proviso c) - Engine Power Checks are performed daily in accordance with Supplement 5 of RFM, and	Consider:  c) - Engine Power Checks are performed daily in accordance with Supplement 5 of RFM, and	Is as you suggest.

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David Ryon AFS-280 NONCONCUR	12/22/22	76-1	7600-01	General: Both B Repair Category Provisos can be slightly simplified for clarity and suggest spell out HEC and NHEC or place in definitions of MMEL	Consider:  May be inoperative provided: a) Landing and take-off with Category A profile are not conducted, b) Dispatch with switch inoperative is not conducted from a location where repair is possible, and c) HEC and NHEC cargo hook operations are not conducted.  And  May be inoperative provided: a) Landing and take-off with Category A profile are not conducted, b) Dispatch with switch inoperative is not conducted from a location where repair is possible, and c) Hoist operations are not conducted.	Concur
David Ryon AFS-280 NONCONCUR	12/22/22	76-1	7600-02	General: Provisos can be slightly simplified for clarity	Consider:  May be inoperative for two flight-days provided: a) Limitations on maximum allowable speed per RFM Section 1 are complied with, b) Dispatch with switch inoperative is not conducted from a location where repair is possible, and c) Special flight permit necessary to reach the repair location is obtained and used.	Concur
David Ryon AFS-280 NONCONCUR	12/22/22	25-4	2550-06	Policy: Consider arranging relief provided per PL 100 and PL 31 best practices	Consider:  May be inoperative or missing provided: a) Cargo compartment remains empty, and b) Repairs are made within 120 consecutive calendar-days or at the next scheduled maintenance check, whichever comes first.	Concur
Robert Nutt/ AFS-330	11/29/22	I	5 <sup>th</sup> row	Definitions and Preamble PAGE NO.. column information	"IV" should read "IX"	Concur



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Robert Nutt/ AFS-330	11/29/22	I	6 <sup>th</sup> row	Guidelines for (M) and (O) Procedures PAGE NO. column information	"X thru" should read "X thru XIV"	Concur
Robert Nutt/ AFS-330	12/1/22	23-4	Item # 2340-02	(M) procedure was added to Remarks or Exceptions column	Insert Change Bars for added information	Concur
Robert Nutt/ AFS-330	12/1/22	25-1	Item # 2520-01	Repair Category, Remarks or Exceptions, and Note 2 information has changed from MMEL Rev 4	Insert Change Bars for the information that has changed in this Item.	Concur
Robert Nutt/ AFS-330	12/1/22	25-2	Item # 2520-03	Repair Category D and Remarks or Exceptions information has changed from MMEL Rev 4	Insert Change Bars for the information that has changed in this Item.	Concur
AFS-800				No comments.		
Public Comments						
Robert Stewart Bristow Group	11/21/22	21-1 thru 5	2100-	Items not in numerical order throughout section 21	Consider renumbering of the 2 ECS systems to avoid confusion.	Per OEM
Robert Stewart Bristow Group	11/21/22	IV & 22-1	2216-01	Highlight of change does not encompass all changes	Revise to include change to Repair Cat	Concur
Robert Stewart Bristow Group	11/21/22	IV		Highlight of change missing for item 2300-04 Remarks change	Add highlight	Concur
Robert Stewart Bristow Group	11/21/22	IV		Highlight of change for 2 systems (2300-03 & 2300-05) Mixed in same line	Revise to 2 lines	Concur
Robert Stewart Bristow Group	11/21/22	IV		Highlight of change missing for addition of 2 <sup>nd</sup> C relief and O procedure for 2340-03 on pg 23-4	Add highlight	Concur
Robert Stewart Bristow Group	11/21/22	V		Highlight of change missing for addition of proviso and M procedure to item 2440-01	Add highlight	Concur
Robert Stewart Bristow Group	11/21/22	V		Highlight of change is incorrect for item 2510-03	Revise	Removed
Robert Stewart Bristow Group	11/21/22	25-1	2510-03	MMEL Rev 4 did not have item 2510-03. Could not have been deleted	Revise	Concur, Removed.
Robert Stewart Bristow Group	11/21/22	25-3	2550-03	Why 1 required for dispatch? Other aircraft models with same hoist have 0. Aircraft could still perform other than hoisting missions if 0.	Consider changing to 0 required for dispatch	Concur
Robert Stewart Bristow Group	11/21/22	28-1	2822-01	Change bar for Remarks with no highlight of change	Add to highlight of change	Concur, change bar removed.

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Robert Stewart Bristow Group	11/21/22	VI		Highlight states modified item 2913-01, should read deleted.	Revise highlight	Concur
Robert Stewart Bristow Group	11/21/22	VI		Incorrect page number and item number listed for changes to item 2913-02	Revise highlight	Concur
Robert Stewart Bristow Group	11/21/22	30-1	3030-01	2 relief with same # required for dispatch? Is this an error? Proviso missing or proviso and different # required for dispatch? 1 <sup>st</sup> relief seems too open.	Clarify relief	Concur
Robert Stewart Bristow Group	11/21/22	76-1	7600-01		Should this item have an O procedure?	Per OEM
Robert Stewart Bristow Group	11/21/22	76-1	7600-02		Should this item have an M&O procedure?	Per OEM
Robert Stewart Bristow Group	11/29/22	34-1	3421-01	Duplicated system? See also 3421-02	Verify 2 system numbers are required for the Standby Attitude Indicator	First one removed.
Robert Stewart Bristow Group	11/29/22	34-2	3421-02	Duplicated system? See also 3421-01	Verify 2 system numbers are required for the Standby Attitude Indicator	Second one remained.