

## FINAL COMMENT LOG

Originating Office: <b>MKC-AEG</b>		Document Title/Description: <b>MMEL CE-700 Rev 1, Textron Aviation Model 700, CE-700, Longitude</b>			POC and Phone Number: <b>James B. Adams, 316-941-1245</b>		Suspense Date: <b>02/15/23</b>
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response	
James Sapoznik AFS-280	8/30/22	IV	Preamble	<p>The Preamble paragraph mentions FSIMS. The FSIMS website is undergoing a phased decommissioning and is expected to be completely retired no later than September 2022.</p> <p>All information is currently accessible on the Dynamic Regulatory System (DRS) which will replace FSIMS.</p>	<p>Change the preamble paragraph to reference the DRS website.</p> <p>For operations under 14 CFR parts 91 subpart K (part 91K), 121, 125, 125 LODA, 129, and 135, refer to the current FAA MMEL Policy Letter PL-34, MMEL and MEL Preamble. For operations under 14 CFR part 91, refer to current FAA MMEL Policy Letter PL-36, 14 CFR Part 91 MEL Approval and Preamble. Both Policy Letters are found on the FAA <b>Dynamic Regulatory System (DRS)</b> website.</p>	Textron Aviation Agrees Replaced with recommended wording.	
James Sapoznik AFS-280	8/30/22	IV	Definitions	<p>The Definitions paragraph mentions FSIMS. The FSIMS website is undergoing a phased decommissioning and is expected to be completely retired no later than September 2022.</p> <p>All information is currently accessible on the Dynamic Regulatory System (DRS) which will replace FSIMS.</p>	<p>Change the preamble paragraph to reference the DRS website.</p> <p>Refer to the current FAA MMEL Policy Letter 25, MMEL and MEL Definitions, found on the FAA <b>Dynamic Regulatory System (DRS)</b> website.</p>	Textron Aviation Agrees Replaced with recommended wording.	
James Sapoznik AFS-280	8/30/22	34-1	34-16-01	<p>Altitude Alerting System.</p> <p>Policy Letter-39 Rev 5 contains an additional requirement in column 4. This requirement is to ensure "altitude capture operates normally".</p>	<p>Ensure that Model 700 aircraft does not have altitude capture.</p> <p>If Model 700 aircraft have altitude capture then recommend amending paragraph a).</p> <p>a) Autopilot with altitude hold, and altitude capture operates normally,</p>	<p>Textron Aviation:</p> <p>The model 700 with G5000 is equipped with the GFC700 autopilot that includes the Altitude capture function. The MMEL is correct as written.</p>	

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James Sapoznik AFS-280	8/30/22	26-1	26-22-01	<p>The remarks and exceptions column in the MMEL does not match Policy Letter-132 Rev 0. The PL-132 states that the inoperative fire extinguisher must "remain in a certified location until removed from the aircraft".</p> <p>The MMEL states that the fire extinguisher will be "removed from installed location, and placed out of sight".</p>	<p>Reword the remarks and exception column to reflect all requirements of PL-132 Rev 0.</p> <p>Any in excess of those required by 14 CFR may be inoperative or removed provided:</p> <ul style="list-style-type: none"> <li>a) Inoperative fire extinguisher remains in a certified location until removed from the aircraft at the next suitable maintenance facility,</li> <li>b) Location placarding is removed or obscured, and</li> <li>c) Required distribution is maintained.</li> </ul>	<p>Textron Aviation agrees.</p> <p>Revised column 4 to reflect PL-132 wording.</p>
D. Sheets, NetJets Aviation, Inc.	08/12/22	21-8	33-02-00B	By 21-30-02, unpressurized configuration calls for different altitude constraints, depending whether or not cabin occupants are included.	Add "Cabin pressurization system is considered inoperative" so that operations reflect cabin occupancy.	Textron Aviation agrees. Added recommended condition.
D. Sheets, NetJets Aviation, Inc.	08/12/22	21-9	62-01-01B	Insofar as no guidance requires parenthetical information in Item column be carried into the MEL, the intent can be omitted or overlooked by the operator. In short, the parenthetical describes a condition rather than a feature of the item title. Transferring this intent to the Remarks or Exceptions column makes it mandatory (similar to 33-20-03-00B).	Insert "May be inoperative provided no cabin occupants are carried." into Remarks or Exceptions.	Textron Aviation agrees. Added recommended condition.
D. Sheets, NetJets Aviation, Inc.	08/12/22	22-1	New item 10-02	Relief for control wheel steering (CWS) is not currently depicted. A CWS button is located on each control wheel and, when pressed and held, it allows manual control of aircraft while autopilot remains engaged.	Add "Control Wheel Steering (CWS) C/2/0."	Textron Aviation agrees. Added relief for CWS.
D. Sheets, NetJets Aviation, Inc.	08/12/22	23-3	50-03-02	Insofar as 50-01 always requires one cockpit speaker to be operative and 50-04 presumes that neither headset audio is functional, it seems reasonable that both headset earphones/headphones can be inoperative provided they are not required by regulation, e.g., for overwater or 135 IFR flight.	Change number required for dispatch to "- " and proviso to read "Any in excess of those required by 14 CFR may be inoperative."	Textron Aviation agrees. Revised proviso as recommended.

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D. Sheets, NetJets Aviation, Inc.	08/12/22	25-4	20-04-02C	Placarding instruction for seat control discrepancy results in more restrictive condition than for parent item (passenger seat).	Restate condition c) to read "...provided seat is considered inoperative."	Textron Aviation agrees. Revised condition C
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-6	50-02-00A	Condition a) is overly restrictive in that it seems to presume the compartment cannot be accessed for any purpose. If so, this exceeds the intent of current PL-104, which permits crewmember access if needed, e.g., preflight inspection.	Adopt FAA policy letter 104, as applicable, to include NOTE 2 in Remarks or Exceptions for first proviso. Doing so should also result in deleting the current condition a) in the MMEL proviso.	Textron Aviation agrees. Removed condition a) and added Note.
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-7	50-02-00B	Condition b), with respect to items that are permanently affixed, appears in conflict with PL-104. It is probable that an item "permanently affixed" within a compartment is retained by means other than the compartment door.	Adopt FAA policy letter 104, as applicable, to include NOTE 2 in Remarks or Exceptions for second proviso.	Textron Aviation agrees. Removed condition b) and added Note.
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-7	60-01	For some operating rules pertinent to this MMEL, a crash axe is not required for passenger seat configuration of 19 or less.	Insert three asterisks beneath Sequence No.	Textron Aviation agrees. Added *** to Sequence No
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-9	New Item XX-XX	Some CE700 aircraft are configured with an observer seat but the MMEL does not yet include relief for this item. Three asterisks likely are appropriate for Sequence No.	Add relief per PL-56, as applicable.	Textron Aviation agrees. Added PL-56 relief applicable to aircraft configuration.
D. Sheets, NetJets Aviation, Inc.	08/12/22	26-1	12-01 (& 20-01)	For this item, the proviso states "APU is not used," but for the following item (APU Fire Extinguishing System), the "APU is considered inoperative." This appears to be a distinction without a difference. While no M or O procedures are pertinent, by definition "considered inoperative" seems to have greater gravity than does "is not used." Which is more appropriate here?	If appropriate, adopt common stipulation for 12-01 and 20-01.	Textron Aviation agrees. Revised proviso to reflect "considered inoperative" for item 26-12-01
D. Sheets, NetJets Aviation, Inc.	08/12/22	26-01	22-01	Recent PL-132 calls for inoperative portable fire extinguisher to be retained in installed location.	Amend to reflect PL-132.	Textron Aviation agrees. Revised proviso to reflect PL-132

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D. Sheets, NetJets Aviation, Inc.	08/12/22	31-5	50-03	What does a zero in "No. required for dispatch" column really signify for white CAS messages? Neither this column nor "number installed" is populated in other MMELs or even exist in PL 119.	Consider adding a general comment in Highlights of Change to express intent.	Textron Aviation does not agree. The intent is to match the corresponding system requirements.
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-6 & -7	50-03-12A & 12B	Two separate provisos are provided for white CVR FAIL message. Are they intended to align with 23-70-01-00A & -00B, respectively?	Clarify.	Textron Aviation agrees that a single entry for the white CVR FAIL CAS message is sufficient for items 23-70-01-00A & -00B. Item 31-50-12B has been deleted.
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-8	50-03-19	It seems this CAS message relates to 26-20-01, APU Fire Extinguishing System. If so, the proviso for 26-20-01 considers the APU inoperative instead of not used. See also earlier comment for 26-12-01 and -20-01.	Amend as appropriate to align conditions of the provisos respectively.	Textron Aviation agrees. Amended proviso as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-13	50-04-21	It seems this CAS message relates to 26-12-01, APU Fire Detection System. If so, the proviso for 26-12-01 states APU is not used instead of considered inoperative. See also earlier comment for 26-12-01 and -20-01.	Amend as appropriate to align conditions of the provisos respectively.	Textron Aviation agrees. Amended proviso as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	33-1	10-02	As written, proviso is applicable for both night and day operations, which appears overly restrictive.	Add "for night operations" following "inoperative."	Textron Aviation agrees. Amended proviso as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	33-1	10-03-00A & -00B	As written, provisos are applicable for both night and day operations, which appears overly restrictive.	Add "for night operations" following "inoperative" in both provisos.	Textron Aviation agrees. Amended proviso as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	33-3	40-03 and others	LED light assemblies are common to CE700, and the NOTE at 40-05 addresses the effect of single element failure. Is this NOTE appropriate for other LED light assemblies?	Review and add NOTE, as applicable.	Textron Aviation: After careful review it was determined that the NOTE in question does not add value to the intent of the relief. Removed NOTE.
D. Sheets, NetJets Aviation, Inc.	08/12/22	33-5	50-03	Insofar as this item cannot be separated from wing inspection lights, the respective repair categories should align.	Change repair category to "C" to align with 33-40-09.	Textron Aviation agrees. Revised repair category as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	34-3	42-01	Garmin GWX weather radar features auto and manual modes, but MMEL treats system as "all or none."	Amend to include separate sub-function relief for Auto Mode and Manual Mode.	Textron Aviation agrees. Amended relief as recommended.

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D. Sheets, NetJets Aviation, Inc.	08/12/22	35-2	30-01	Recent PL-132 calls for inoperative portable oxygen system to be retained in installed location.	Amend to reflect PL-132.	Textron Aviation agrees. Amended proviso as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	35-2	30-02	Recent PL-132 calls for inoperative portable protective breathing equipment (PBE) to be retained in installed location.	Amend to reflect PL-132.	Textron Aviation agrees. Amended proviso as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	49-1	20-01	If APU is, in fact, inoperative it obviously cannot be used.	Amend to read "May be inoperative provided procedures do not require its use."	Textron Aviation agrees. Amended proviso as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	New ATA 79-1	New item xx-xx	Remote oil level system is included in refuel/defuel panel, but no relief is yet provided for ROLS.	Add new ATA chapter 79, Engine Oil, and then provide relief such as: "Remote Oil Level Indication System C / 2 / 0 May be inoperative provided associated oil tank sight gauge is used to determine oil level."	Textron Agrees. Added relief as recommended.
D. Sheets, NetJets Aviation, Inc.	08/12/22	21-4	31-02	In condition a), "button" seems superfluous; it is not used in preceding provisos wherein MANUAL is selected.	Delete "button."	Textron Aviation agrees. Amended proviso as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	22-3	13-03-05	In parenthetical phrase of item title, need upper case "L" or lower case "l" for consistency.	None.	Textron Aviation agrees. Revised to upper case for consistency.
D. Sheets, NetJets Aviation, Inc.	08/12/22	24-1	30-01	For consistency, in NOTE 2 the color of the CAS message should be depicted as "Red" instead of all uppercase.	None.	Textron Aviation agrees. Revised to reflect "Red".
D. Sheets, NetJets Aviation, Inc.	08/12/22	24-1	37-01	Ditto.	None.	Textron Aviation agrees. Revised to reflect "Red"
D. Sheets, NetJets Aviation, Inc.	08/12/22	24-1	37-02	Ditto.	None.	Textron Aviation agrees. Revised to reflect "Red"
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-1	10-02	Insofar as sub-items are optional, it is reasonable that three asterisks be depicted only for the parent item.	Re-position three asterisks to parent item (cockpit divider) and remove from sub-items.	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	25-2	20-01-04	Three asterisks for parent item (cabin divider) indicates it not applicable to all configurations; therefore, those for sub-item Cam Latch are redundant.	Remove three asterisks from 20-01-04.	Textron Aviation agrees. Revised as recommended

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D. Sheets, NetJets Aviation, Inc.	08/12/22	25-3	20-02	Insofar as intent is that a single window shade immediately adjacent or within the escape hatch be suitable for viewing, "shades" should be singular.	None.	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-1	10-02-01	Starting with this proviso, "prior to each flight" appears 14 times, whereas "before every flight" appears in the next proviso and 9 other instances.	Adopt one convention throughout.	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-8	50-03-21	Condition b) uses "messages are" and next two provisos use "message is". Either is correct but only one convention should be used.	For consistency, use "message is".	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-14	50-04-26	Typo in proviso for "bagage".	None.	Textron Aviation agrees. Corrected
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-15	50-04-29	Non-standard system description used in proviso.	For consistency, add "cabin" before "pressurization system" to match item title at 21-30-02.	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-17	50-04-44	Typo in proviso for "Reapairs".	None.	Textron Aviation agrees. Corrected
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-18	50-04-49	Non-standard format for CAS message in NOTE.	For consistency, add "CAS message" following message label.	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	31-20	50-04-57 & -58	Typo in proviso for "inopertive".	None.	Textron Aviation agrees. Corrected
D. Sheets, NetJets Aviation, Inc.	08/12/22	33-4	40-09-00C	Typo in NOTE for "oprations".	None.	Textron Aviation agrees. Corrected
D. Sheets, NetJets Aviation, Inc.	08/12/22	34-9	52-01-00B	In condition c), an unneeded comma follows "TCAS".	None.	Textron Aviation agrees. Corrected
D. Sheets, NetJets Aviation, Inc.	08/12/22	36-3	36-10-01-01B	Non-standard system description used in condition c) of proviso.	For consistency, add "cabin" before "pressurization system" to match item title at 21-30-02.	Textron Aviation agrees. Revised as recommended

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D. Sheets, NetJets Aviation, Inc.	08/12/22	49-1	50-02	NOTE says that APU engine start "may not" be available, whereas NOTE for two previous items uses "will not". In view of inoperative system and APU BLEED selected off, "will not" seems more appropriate.	In NOTE, change "may" to "will".	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	57-1	40-01	"proviso b)" is more properly referred to as a condition instead of a proviso; the proviso consists of the stem lead-in and the five conditions in aggregate.	Change "proviso" to "condition".	Textron Aviation agrees. Revised as recommended
D. Sheets, NetJets Aviation, Inc.	08/12/22	57-1	40-02	Ditto.	Ditto.	Textron Aviation agrees. Revised as recommended