

FINAL COMMENT LOG

Originating Office: SEA-AEG		Document Title/Description: MMEL EMB-120 Rev 11, Embraer S.A., EMB-120 Series, All Models			POC and Phone Number: David L. Robinson, 206-231-3912		Suspense Date: 04/10/2023
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response	
James Driscoll AFS-280	6/14/22	33-3	34-44-1	Remarks should read: May be inoperative except during sunset to sunrise operations.	Replace night operations with sunset to sunrise as per 14 CFR 91.209.	Concur. Updated second dispatch condition proviso by adding sunset to sunrise limitation.	
Gary Kappa AFS-330 Commercial	6/24/22	12	Definitions and Preamble reference to FSIMS website	Needs to be updated to reference DRS, not FSIMS.	See comments on Excel Document for David L Robinson, Chair Flight Operations Evaluation Board (FOEB)	Concur. Removed FSIMS references and updated to DRS.	
Patrick Hammer 414-744-5525 Freight Runners Express, Inc.	05/31/22	23-4	23-41-1-a	Aircraft with an aft lavatory/galley in pax configuration have 2 handsets (1 by the FA seat and the other in the galley) and aircraft with forward lavatory/galley have 1 handset (by the FA seat). Both configurations only have 1 FA seat at the forward main cabin door. MMEL item only addresses the system and not the individual handset or interphone functions. Aft galley FA interphone position is not required by 14 CFR 135.150 or 121.319	Apply MMEL relief for the aft position Flight Deck to Cabin, Cabin to Flight Deck Functions interphone handset with repair category D.	Concur. Added sub-sub-item 23-41-1 1) c) for Aft Attendant Call Unit.	
Patrick Hammer 414-744-5525 Freight Runners Express, Inc.	05/31/22	23-6	23-70-1	Cockpit Voice Recorder is only required for Part 135 operations in a multiengine, turbine-powered airplane with six or more seats. In an all cargo configuration zero passenger seats are installed. CVR deferral repair category A with 3 flight days is not appropriate for all cargo configured aircraft. FDR is also not required for Part 135 operations in a multi-engine, turbine-engine powered aircraft with zero passenger seats.	Add proviso with category D relief with the remarks or exceptions "Any in excess of those required by 14 CFR may be inoperative."	Non-concur. The relief currently provided by item 23-70-1 aligns with FAA policy. NTSB recommendations were taken into consideration with the development of this policy. The relief stands as written IAW FAA MMEL Policy Letter PL-29.	

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Patrick Hammer 414-744-5525 Freight Runners Express, Inc.	05/31/22	34-6	34-40-1	34-40-1, MMEL title is GPWS (Operations or Configuration Requiring Minimum Class A TAWS Equipment Required) No provision exists if TAWS (Class A or B) is not required by 14 CFR.	Add provision with category D relief with the remarks or exceptions "Any in excess of those required by 14 CFR may be inoperative."	Non-concur. MMEL relief for TAWS equipment is based on the operation being conducted, which sets the criteria for either Class A or Class B TAWS. FAA Policy specifies optional relief for Class C TAWS. When operations being conducted do not specify the requirement for either Class A or Class B TAWS, then Class C TAWS relief may be used, which FAA policy specifies as having a C repair interval. The relief stands as written IAW FAA MMEL Policy Letter PL-54.
Patrick Hammer 414-744-5525 Freight Runners Express, Inc.	05/31/22	34-8	34-40-2	MMEL title is GPWS (Operations and Configuration Requiring Minimum Class B TAWS Equipment) No provision exists if the Class B TAWS is not required by 14 CFR.	Add provision with category D relief with the remarks or exceptions "Any in excess of those required by 14 CFR may be inoperative."	Non-concur. MMEL relief for TAWS equipment is based on the operation being conducted, which sets the criteria for either Class A or Class B TAWS. FAA Policy specifies optional relief for Class C TAWS. When operations being conducted do not specify the requirement for either Class A or Class B TAWS, then Class C TAWS relief may be used, which FAA policy specifies as having a C repair interval. The relief stands as written IAW FAA MMEL Policy Letter PL-54.

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Patrick Hammer 414-744-5525 Freight Runners Express, Inc.	05/31/22	73-1	73-32-1	Relief is only provided for the fuel flow indicators, relief should be provided for digital indications as well as the entire fuel flow system indication.	Add MMEL relief for the fuel flow indicators, Digital Indications, Category C, 2 installed, 0 required (similar to ATA 77 digital indications).	Non-concur. This current MMEL relief, as provided by item 73-32-1, has existed in the EMB-120 MMEL at least since 1990 with Revision 2. There has not been a proper proposal submitted to the FOEB for a change to this relief. Recommendation is to submit a proposal to the FOEB Chair in accordance with FAA Order 8900.1 (reference Volume 8, Chapter 2, Section 3) with accompanying justifications for FOEB evaluation. The relief stands as currently exists in MMEL.
David L. Robinson AFS-110	12/05/22	Cover Page		Cover page data needs updating.	Update cover page data.	Updated cover page data.