

FINAL COMMENT LOG

Originating Office: FTW-AEG		Document Title/Description: MMEL MBB-BK-117 D2/D3 Rev 2, Airbus Helicopters Deutschland GmbH (AHD), MBB-BK 117 D-2/D-3 (TCDS H13EU)			POC and Phone Number: Vince Whiting, 817-222-5299	Suspense Date: 03/07/2023
Commenter Name and Organization	Date	Page #	Line, Para, or Item #	Comment	Recommendation	Response
David S. Ryon AFS-280	1/4/22	title	Aircraft Make and Model	Policy: TCDS is listed on title page while the title page template (Page 4) in PL 31 (Policy 1.) does not show the TCDS.	Remove unless it adds value.	No change. Adds value.
David S. Ryon AFS-280	1/4/22	III	Highlights of Change	General: The HOC references Revision 7 in bold, but the MMEL Revision number is 2.	Change Revision 7 to Revision 2.	Changed Revision 7 to Revision 2.
David S. Ryon AFS-280	1/5/22	XII	Definitions and Preamble	General: FSIMS will be sunseting in the near future, suggest update with a Dynamic Regulatory System (DRS) reference.	USE DRS reference in Definitions and Preamble https://drs.faa.gov/ Document type - Master Minimum Equipment List Policy Letters Use PL-025, PL-034, and PL-036.	Changed FSIMS reference to "...found on the FAA Dynamic Regulatory System website: https://drs.faa.gov/ in the Definitions and Preamble sections.
David S. Ryon AFS-280	1/5/22	21-6	2150-01 Cooling Unit for Lower Avionics Bay	Policy: Provisos contains "or". Delete the word "or" between proviso conditions, and repeat the proviso conditions as necessary to eliminate the use of "or". (PL-31 Policy 22.)	Consider: D 0 May be inoperative provided it is not required for the intended operation. D 0 May be inoperative provided current and forecast OAT is < 30 °C.	Changed to: D 0 May be inoperative provided it is not required for the intended operation. D 0 May be inoperative provided current and forecast OAT is < 30 °C.
David S. Ryon AFS-280	1/5/22	22-5	2215-12 4-Way Beep Trim Switch on Collective	Question: The B Repair Category Remarks state "one or both may be inoperative" would B 2 0 clarify the item? (PL-31 Policy 9.)	Consider using B 2 0 for Repair Category, No. Installed, and No. Required for Dispatch, if it helps clarify the item.	No change. The current entry reflects the EASA MMEL. The operator can replace the "-" in the MEL.
David S. Ryon AFS-280	1/5/22	22-6	2215-13 Force Trim Release Switch on Cyclic Stick	Policy: In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity. (PL-31 Policy 13.) Also, would a "2" be appropriate for Column 2. (Number installed)? (PL-31 Policy 9.)	Suggest list the specific items needed to be operative by the exact same title: item A, item B, item C, item D are operative. Update column 2. To "2" if appropriate for greater clarity	Removed the relief for dispatching with 0 cyclic force trim release switches inoperative since the RFM procedure states "Land As Soon As Practicable." See RFM paragraph 3.2.3.2

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David S. Ryon AFS-280	1/5/22	22-6	2215-14 Force Trim Release Switch on the Collective Lever	Policy: B Repair Category - In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity, (PL-31 Policy 13.) Also, would a "2" be appropriate for Column 2. (Number installed)? (PL-31 Policy 9.)	Suggest list the specific items needed to be operative by the exact same title: item A, item B, item C, item D are operative Update column 2. To "2" if appropriate for greater clarity	Removed the relief for dispatching with 0 collective force trim release switches inoperative since the RFM procedure states "Land As Soon As Practicable." See RFM paragraph 3.2.3.3.
David S. Ryon AFS-280	1/5/22	22-7	2215-14 Force Trim Release Switch on the Collective Lever	General: Remarks require one operative but the number required for dispatch shows zero. Align both to show one required if appropriate. Also In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity, (PL-31 Policy 13.)	Replace 0 with 1 under column 3, No. required for Dispatch. Suggest list the specific items needed to be operative by the exact same title: item A, item B, item C, item D are operative	1. Replaced 0 with 1 under column 3, No. required for Dispatch. 2. The OEM's definition has been added to the definitions section of the MMEL. Added the requirement for the owner/operator to add the OEM's definition of "All other AFCS related equipment is operative" to the list of PL-25 definitions that they are required to put in their MEL.
David S. Ryon AFS-280	1/5/22	22-7	2215-14 Force Trim Release Switch on the Collective Lever	General: H/C appears to be used here for Helicopter, and in numerous places in the document. Is this abbreviation defined somewhere? I could not find it in the AIM, the Rotorcraft Commercial PTS, part 1, 61, 91, 110, 135, or a google search. Suggest replace it with Helicopter spelled out. As an alternative, It could be added to the definitions up front if desired.	Recommend replacing H/C with Helicopter throughout the document. As an alternative, consider adding H/C abbreviation as a definition in the Definitions section in the front of the MMEL for clarity.	Incorporated list of acronyms into the MMEL. Pages XIII, XIV, XV.
David S. Ryon AFS-280	1/5/22	22-7	2215-16 Collective SEMA	Policy: Use "and," after first set of provisos (PL-31)	Add "and," after first set of a) provisos	Added "and" in the appropriate spot.
David S. Ryon AFS-280	1/7/22	22-8	2215-17 A/P 1/2 Interface to Multi- Functional Displays	Policy: Proviso c) - In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity, (PL-31 Policy 13.)	Suggest list the specific items needed to be operative by the exact same title: item A, item B, item C, item D are operative	The OEM's definition has been added to the definitions section of the MMEL. Added the requirement for the owner/operator to add the OEM's definition of "All other AFCS related equipment is operative" to the list of PL25 definitions that they are required to put in their MEL.

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David S. Ryon AFS-280	1/7/22	22-8	2215-18 APU UM OFF Push Button on Cyclic Stick	Policy: Second C Repair Category - In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity, (PL-31 Policy 13.) Also, would a "2" be appropriate for Column 2. (Number installed)? (PL-31 Policy 9.)	Suggest list the specific items needed to be operative by the exact same title: item A, item B, item C, item D are operative Update column 2. to "2" if appropriate, for greater clarity.	The OEM's definition has been added to the definitions section of the MMEL. Added the requirement for the owner/operator to add the OEM's definition of "All other AFCS related equipment is operative" to the list of PL25 definitions that they are required to put in their MEL.
David S. Ryon AFS-280	1/7/22	22-9	2215-20 AP/BKUP on 4- Way button on Cyclic Stick	Policy: In lieu of "All other AFCS related equipment is operative" in Remarks, list the specific items needed to be operative for greater clarity, (PL-31 Policy 13.) Also, would a "2" be appropriate for Column 2. (Number installed)? (PL-31 Policy 9.)	List the specific items needed to be operative.	1. The OEM's definition has been added to the definitions section of the MMEL. Added the requirement for the owner/operator to add the OEM's definition of "All other AFCS related equipment is operative" to the list of PL25 definitions that they are required to put in their MEL. 2. Left the "-" in column 2. It is what the EASA MMEL has in column 2.
David S. Ryon AFS-280	1/7/22	23-1	2300-01 Cockpit Intercom System (ICS)	General: Wording - Suggest Single Pilot operation	Consider: (O) May be inoperative for single pilot operation provided:	Changed to "May be inoperative for single pilot operation provided:"
David S. Ryon AFS-280	1/7/22	23-2	2310-01 High Frequency Communications System (HF)	Policy: PL-106 is listed in parenthesis. PL-31 sample formatting does not show policy letter references.	Remove Policy Letter references for standardization with PL-31 sample format.	Removed reference to PL-106.
David S. Ryon AFS-280	1/7/22	23-3	2311-01 Communications Systems (VHF and UHF)	Policy: PL-106 is listed in parenthesis. PL-31 sample formatting does not show policy letter references. Suggest	Remove Policy Letter references for standardization with PL-31 sample format. Also remove throughout the document.	It appears Mr. Ryon meant PL-95 instead of PL-106. Removed reference to PL-95.

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David S. Ryon AFS-280	1/7/22	32-1	3211-01 Snow Skis	Question – item is listed as Skis, but provisos describe Snow skids. Should they be one and the same? Policy: Contains “or”. Delete the word “or” between proviso conditions, and repeat the proviso conditions as necessary to eliminate the use of “or”. (PL-31 Policy 22.)	Consider:	Changed item name to Snow Skids to match the EASA MMEL Split into two provisos and changed proviso content to match EASA MMEL. Changed number required for dispatch to “0” for all cases.
David S. Ryon AFS-280	1/7/22	32-1	3211-02 Settling Protectors	Policy: Contains “or”. Delete the word “or” between proviso conditions, and repeat the proviso conditions as necessary to eliminate the use of “or”. (PL-31 Policy 22.)	Consider:	Split into two provisos and changed proviso content to match EASA MMEL. Changed number required for dispatch to “0” for all cases.
David S. Ryon AFS-280	1/7/22	33-3	3340-03 Anti-Collision Light System	Regulatory: Required for all operations (contrary to 91.209(b))	Remove from MMEL	No change. Aircraft is equipped with a strobe light which could be substituted for the anti-collision light.
David S. Ryon AFS-280	1/7/22	34-2	3421-01 Alternate Static Port System	General: Proviso uses “handling pilot”. Suggest use flying pilot or similar for better clarity.	Consider: May be inoperative for VFR provided static port heater on flying pilot’s side is operative.	Changed “handling pilot’s side” to “flying pilot’s side.”
David S. Ryon AFS-280	1/7/22	63-1	6321-01 Mast Moment Indicating System	General: Proviso uses “sloping”. Suggest use “slope” for greater clarity.	Consider: (O) May be inoperative for a maximum of 5 flights provided: a) Maximum ground slope for landing is limited to 3° in all directions, and b) RFM limitations and procedures for inoperative mast moment indicating system are followed.	The correct item # form Mast Moment Indicating System is 6330-01. Changed “maximum ground sloping” to “maximum slope.”
David S. Ryon AFS-280	1/12/22	34-6	3445-01 2), c) Airspeed Selection Function	Policy: Item title shows “Airspeed”. Replace with Airspace. (PL-32)	Use: c) Airspace Selection Function	Changed “Airspeed” to “Airspace.”

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David S. Ryon AFS-280	1/13/22	31-8	3110-33 Data Transfer Device	Regulatory: May be contrary to 135.607 Flight Data Monitoring System for Helicopter Air Ambulance operations if DTD is a part of that system.	Suggest list item as Other than Helicopter Air Ambulance Operations or similar if appropriate.	No change. An inoperative DTD does not make the HTAWS inoperative. The MMEL is for inoperative equipment. The pilot/operator is responsible for ensuring the database is current. The NOTE informs the pilot the HTAWS database cannot be updated. The DTD could be inoperative and the HTAWS database could still be current.
David S. Ryon AFS-280	1/13/22	31-9	3130-03 HUMS Recording System	Regulatory: May be contrary to 135.607 Flight Data Monitoring System for Helicopter Air Ambulance operations if HUMS is a part of that system.	Suggest list item as Other than Helicopter Air Ambulance Operations or similar if appropriate.	No change. HUMS is a maintenance recording system. §135.607 does not apply.
David S. Ryon AFS-280	1/13/22	31-8	3130-01 Flight Data Recorder	General: For Holder of an Air Carrier or Commercial Operating Certificate - FDR recording parameters not required by 14 CFR may be added for additional relief (PL-87).	Consider adding additional relief if appropriate.	Item 3130-02 includes the relief of the second half of PL-87 and covers the relief for other than air carriers and commercial operators.
David S. Ryon AFS-280	1/13/22	31-9	3130-02 Flight Data Recorder	General: Cockpit Voice Recorder is listed as (DVR). Appears to need to be CVR.	Change to (CVR) as appropriate.	Changed the relief to reflect PL-87. This eliminated the need to correct "DVR" to "CVR."
David S. Ryon AFS-280	1/13/22	23-3	2311-01 Communication Systems (VHF and UHF), 1) VHF Communications Control Panels, d) Frequency Indication	Policy: Item shows 0 required for dispatch, PL-95 shows 2.	Change to match PL-95 if appropriate.	No change. The aircraft does not have the lights, switches, and knobs etc. referred to in the PL-95.
David S. Ryon AFS-280	1/13/22	34-9	3452-02 ADS-B Out UAT	Policy: C Repair category has slight variance in proviso.	Change to match PL-105: "One may be inoperative."	Changed "May be inoperative" to "One may be inoperative." Changed (in the NOTE) "use" to "used."
David S. Ryon AFS-280	1/13/22	25-4	2560-03 First Aid Kit (FAK) and/or associated Equipment	Policy: Remove Note after Remarks, as each Note applies only to the relief proviso it immediately follows. (PL-31 Policy 23. And PL-132).	Remove Note.	Removed note.

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David S. Ryon AFS-280	9/21/22	22-6	2215-14	Sugestion - A Repair Category provisos can be adjusted slightly for better clarity	Consider: Any in excess of one (force trim permanently released) may be inoperative for 1 flight-day under VFR for the purpose of returning directly to a base where repairs can be made provided: <ul style="list-style-type: none"> a) All other AFCS related equipment is operative, b) H/C is flown dual pilot, c) Hands on control of collective lever is always conducted, and d) "Extended Envelope" as given in RFM section "Center of Gravity Limitations" is not used. 	Recommendation incorporated as suggested.
David S. Ryon AFS-280	9/21/22	32-1	3211-01 Snow Skids	Sugestion – Second C Repair Category provisos can be adjusted slightly for better clarity	Consider: (M)(O) One or both may be missing provided operations do not require its use.	Recommendation incorporated as suggested.
John Drago AFS-830 ACO 330-608-3887	1/12/22	23-4	2370-03	Cockpit Voice Recorder (CVR) Installed for an Operator Other Than a Holder of an Air Carrier or Commercial Operator Certificate Repair category A specified without a repair interval.	Please specify a repair interval.	No change – Policy Letter has been incorporated as written.
Philip (Vince) Whiting AFS-140	8/8/22	X	3421-01			Modified explanation of change.
Philip (Vince) Whiting AFS-140	8/8/22	XIX	3320-01			Removed reference to PL-125.
Philip (Vince) Whiting AFS-140	8/8/22	XX	3444-01			Removed reference to PL-131.
Philip (Vince) Whiting AFS-140	8/8/22	22-1	2200-01			Removed reference to PL-101.
Philip (Vince) Whiting AFS-140	8/8/22	23-3	2312-01			Removed reference to PL-95.

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Philip (Vince) Whiting AFS-140	8/8/22	23-4	2370-01			Removed reference to PL-29.
Philip (Vince) Whiting AFS-140	8/8/22	23-4	2370-02			Removed reference to PL-29.
Philip (Vince) Whiting AFS-140	8/8/22	23-4	2370-03			Removed reference to PL-29.
Philip (Vince) Whiting AFS-140	8/8/22	25-1	2500-03			Removed reference to PL-125.
Philip (Vince) Whiting AFS-140	8/8/22	25-3	2520-01			Removed reference to PL-79.
Philip (Vince) Whiting AFS-140	8/8/22	25-3	2550-02			Removed reference to PL-100.
Philip (Vince) Whiting AFS-140	8/8/22	25-4	2560-03			Removed reference to PL-132.
Philip (Vince) Whiting AFS-140	8/8/22	25-5	2562-01			Removed reference to PL-120.
Philip (Vince) Whiting AFS-140	8/8/22	25-6	2562-01 (Cont'd)			Removed reference to PL-120)
Philip (Vince) Whiting AFS-140	8/8/22	26-1	2622-01			Removed reference to PL-132
Philip (Vince) Whiting AFS-140	8/8/22	31-7	3110-31			Removed reference to PL-121.
Philip (Vince) Whiting AFS-140	8/8/22	31-8	3130-01			Removed reference to PL-87.
Philip (Vince) Whiting AFS-140	8/8/22	31-9	3130-02			Removed reference to PL-87 and changed the provisos to reflect the PL-87.

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Philip (Vince) Whiting AFS-140	8/8/22	33-1	3300-01			Removed reference to PL-127.
Philip (Vince) Whiting AFS-140	8/8/22	33-1	3310-01			Removed reference to PL-77.
Philip (Vince) Whiting AFS-140	8/8/22	33-2	3320-01			Removed reference to PL-125.
Philip (Vince) Whiting AFS-140	8/8/22	34-3	3444-01			Removed reference to PL-131.
Philip (Vince) Whiting AFS-140	8/8/22	34-4	3444-01			Removed reference to PL-131.
Philip (Vince) Whiting AFS-140	8/8/22	34-5	3445-01			Removed reference to PL-32.
Philip (Vince) Whiting AFS-140	8/8/22	34-6	3445-01			Removed reference to PL-32.
Philip (Vince) Whiting AFS-140	8/8/22	34-6	3451-01			Removed reference to PL-03.
Philip (Vince) Whiting AFS-140	8/8/22	34-7	3452-01			Removed reference to PL-76.
Philip (Vince) Whiting AFS-140	8/8/22	34-8	3452-02			Removed reference to PL-105.
Philip (Vince) Whiting AFS-140	8/8/22	34-9	3452-02			Removed reference to PL-105.
Philip (Vince) Whiting AFS-140	8/8/22	34-10	3461-01			Removed reference to PL-98.
Philip (Vince) Whiting AFS-140	8/8/22	52-1	5210-01			Removed reference to PL-69.