Federal Aviation Administration

MMEL Policy Letter (PL) 120, Revision 4, GC

Date:	XX/XX/XXXX
To:	All Aircraft Evaluation Division (AFS-100) Branch Managers
From:	Division Manager, Aircraft Evaluation Division (AFS-100)
Reply to Attn of:	Manager, Standards and Policy Branch, (AFS-160)

MMEL GLOBAL CHANGE (GC)

This is an approved addendum to all existing Master Minimum Equipment List (MMEL) documents. Operators may seek use of the specific relief contained in this PL by revising their minimum equipment list (MEL). In doing so, each applicable sample proviso must be copied verbatim in the operator's MEL. Approval of a revised MEL is gained using established procedures, through the assigned Principal Operations Inspector (POI).

SUBJECT: **Emergency Locator Transmitters/Low Frequency Underwater Locator Beacons/Devices/Equipment for Location of an Aircraft in Distress**

MMEL CODE: 23 (Communications)
25 (Equipment/Furnishings)

REFERENCE: PL-120, Revision 3, dated April 12, 2019.
Title 14 CFR Part 91, § 91.207(f)(10).
AC 91-44A CHG 1, Installation and Inspection Procedures for Emergency Locator Transmitters and Receivers, February 1, 2018.
ICAO Annex 6, Part I, Section 6.5.3.1.
EASA Point CAT.GEN.MPA.210 of Annex IV.

PURPOSE:
This PL provides standardized policy and guidance for MMEL requirements for Emergency Locator Transmitters (ELT), Underwater Locator Beacons (ULB)/Underwater Locator Devices (ULD), and Equipment for Location of an Aircraft in Distress.

REVISION HISTORY:
Revision 4: PL-120, Revision 4, dated Month Day, Year.

- Reformats with updated template, which moved Revision History out of Discussion into its own section.
- Adds relief for fixed low frequency ULBs (LF-ULB)/low frequency ULDs (LF-ULD) to standardize the MMEL relief and clarify requirement provided in International Civil Aviation Organization (ICAO) Annex 6, Part I, Chapter 6.5.3.1.

- Adds relief for Equipment for Location of an Aircraft in Distress due to updated requirements in European Union Aviation Safety Agency (EASA) Point CAT.GEN.MPA.210 of Annex IV (Part-CAT) to Regulation (EU) No. 965/2012 ("Air OPS Regulation").
- Revises standard language from "Any in excess of those required by 14 CFR" to "Any in excess of those required by regulations" to include regulation requirements of other national aviation authorities.

Revision 3: PL-120, Revision 3, dated April 12, 2019.

- Corrected placarding requirements in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part 91, § 91.207(f)(10)(i).
- Added (M) designator to 2nd dispatch option for fixed ELTs.

Revision 2: PL-120, Revision 2, dated December 04, 2017.

- Added Category D relief for an installed remote ELT switch. An inoperative remote ELT switch has no effect on ELT operation provided the remote ELT switch is deactivated and placed in the ARMED mode.
- Added Category D relief for an ELT indicator light and an ELT aural alarm, both of which, if inoperative, have no effect on ELT operation.

Revision 1: PL-120, Revision 1, dated January 20, 2009.

- Added ATA code assignment ATA 23 and the requirement that an inoperative system that remains installed must be deactivated.
- For fixed ELTs, the items were split into two parts; those that are inoperative, and those that are missing.
- Added relief for Emergency Locator Transmitters (ELT). After review by the Flight Operations Policy Board (FOPB), a determination was made that MMEL policy for ELTs was necessary in order to clarify the relief provided in § 91.207(f)(10).

Revision 0: PL-120, Revision Original, dated January 01, 2007.

DISCUSSION:
Current relief for ELTs in PL-120 addresses the five basic types of ELTs: automatic fixed (ELT-AF), automatic portable (ELT-AP), survival (ELT-S), automatic deployable (ELT-AD), and distress triggered (ELT-DT) (AC 91-44A CHG 1). However, other transmitting devices such as a LF-ULB, LF-ULD, or Equipment for Location of an Aircraft in Distress may also be eligible for relief under specific conditions.

In November 2014, the ICAO updated requirements for Annex 6, Part I - International Commercial Air Transport – Aeroplanes. One of the updates included Chapter 6.5.3, "All aeroplanes on long-range over-water flights," which required the following as stated from Annex 6 to the Convention on International Civil Aviation, Chapter 6, Section 5:

"at the earliest practicable date, but not later than 1 January 2018, on all aeroplanes of a maximum certificated takeoff mass of over 27 000 kg, a securely attached underwater locating device operating at a frequency of 8.8 kHz. This automatically activated underwater locating device shall operate for a minimum of 30 days and shall not be installed in wings or empennage."

> **Note:** The LF-ULB is not to be confused with the cockpit voice recorder (CVR) or flight data recorder (FDR)-mounted ULB/ULD.

Per Annex 6, Part I, Chapter 6.5.3, ULB performance requirements are contained in SAE AS6254 or other equivalent documents.

The EASA has also recently updated requirements in Point CAT.GEN.MPA.210 of Annex IV (Part-CAT) to Regulation (EU) No. 965/2012 ("Air OPS Regulation") to include Equipment for Location of an Aircraft in Distress. Although the FAA does not currently have a similar regulation, the airplanes intending to operate in the airspace will require systems and/or equipment for compliance.

POLICY:
The policy below is a standard that may be applied to ELT, LF-ULB/LF-ULD, and Equipment for Location of an Aircraft in Distress systems and equipment.

It is the responsibility of Flight Operations Evaluation Board (FOEB) Chairpersons assigned to specific aircraft types to review and determine if all or part of this policy is applicable to those aircraft types based on the systems and equipment installed.

AIRCRAFT: (Insert aircraft make and model)	**TABLE KEY** 1. REPAIR CATEGORY 2. NO. INSTALLED 3. NO. REQUIRED FOR DISPATCH 4. REMARKS OR EXCEPTIONS

23. Communications or
25. Equipment/Furnishings

Sequence No.	Item	1	2	3	4	Change Bar
XX-XX	Emergency Locator Transmitter (ELT)					
1) ***	Survival Type ELT	D	-	-	Any in excess of those required by regulations may be inoperative or missing.	|
2) ***	Fixed ELT	A	-	0	(M) May be inoperative provided: a) System is deactivated, and b) Repairs are made within 90 consecutive calendar-days.	|
		A	-	0	(M) May be missing provided: a) Placard stating, “ELT not installed,” is placed in view of the pilot, and b) Repairs are made within 90 consecutive calendar-days.	|
		D	-	-	(M) Any in excess of those required by regulations may be inoperative provided system is deactivated.	|
		D	-	-	Any in excess of those required by regulations may be missing.	|
3) ***	Remote ELT Switch	D	-	-	(M) May be inoperative provided: a) Remote ELT switch is deactivated, and b) ELT switch is placed in the ARMED mode.	|

(Continued)

AIRCRAFT: (Insert aircraft make and model)	**TABLE KEY** 1. REPAIR CATEGORY 2. NO. INSTALLED 3. NO. REQUIRED FOR DISPATCH 4. REMARKS OR EXCEPTIONS

23. Communications or
25. Equipment/Furnishings

Sequence No.	Item	1	2	3	4	Change Bar
XX-XX	Emergency Locator Transmitter (ELT) (Cont'd)					
4) ***	ELT Indicator Light	D	-	0		|
5) ***	ELT Aural Alarm	D	-	0		|
XX-XX ***	Low Frequency Underwater Locator Beacon (LF-ULB)/Low Frequency Underwater Locator Device (LF-ULD)	D	-	-	Any in excess of those required by regulations may be inoperative.	|
XX-XX ***	Equipment for Location of an Aircraft in Distress	D	-	-	Any in excess of those required by regulations may be inoperative or missing.	|
		A	-	0	May be inoperative for a maximum of 6 flights or 25 flight-hours, whichever occurs first.	|
		C	-	0	May be inoperative provided that at least one automatic ELT is operative.	|

Each FOEB Chair should review the specific aircraft configuration(s) and apply this policy to affected MMELs through the normal FOEB process.

Manager, Aircraft Evaluation Division