**DOCUMENT COMMENT LOG**

**Document Title: NPA 2012-09 - CS GENERIC MMEL for other-than-complex motor-powered aeroplanes (1222)**

| Commenter | Page/Paragraph | Comment | Suggested Change |
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| Cessna Aircraft Company | All items with a (M) and/or (O) | All items requiring a procedure should have the basic requirements listed in the proviso. There are numerous examples where a procedure has been required but there is nothing in the proviso to accomplish. In the draft, there are narratives that address this task needed however; will these be shown in the final document? If not, how would the author of the individual MMEL know what is to be expected? | See the example for item 21-50-1 Air Conditioning |
| Cessna Aircraft Company | 6 of 79, note 17 | The third sentence begins to discuss placing required equipment in the TCDS for very light aeroplanes (VLA). | Cessna would recommend a Kind of Equipment List similar that required for part 23 aircraft be included in the AFM/POH or equivalent for these type aircraft. |
| Cessna Aircraft Company | 8 of 79 and 14 of 79 | CS GEN.MMEL.150 addresses Operational and maintenance procedures and that these procedures be made available to the affected operators.<br><br>The Preamble, Utilisation, then goes on to state:<br><br>Where O and M procedures are listed in the MMEL, it is the operator's responsibility to develop them with respect to the numbering system used by the aeroplane manufacturer. Those procedures should be developed in accordance with the air operations (IR OPS) and airworthiness regulations (Part M), using data provided by the aeroplane manufacturer's flight manual, maintenance manuals, recommendations or service information.<br><br>This is in direct conflict with the statement made in CS GEN.MMEL.150 Operational and Maintenance procedures in that the first reference implies it is the responsibility of the manufacturer to provide these procedures then in the second reference, it is implied the operator must develop these procedures. | Both sections reference should be reviewed so that no ambiguity can be inferred by any operator/inspector. |
| Cessna Aircraft Company | All unpressurized relief | Because the definition of a non-complex aircraft is different for EASA than the FAA, Cessna has a concern for those aircraft such as the Cessna 425 that can operate at higher altitudes than most pressurized aircraft that can be covered by this MMEL. | The proviso should make some reference to operating requirements using oxygen. |

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| Cessna Aircraft Company | Item 21-30-3<br><br>Cabin Altitude Indicator | Cessna finds it prudent to recommend the following proviso to make sure aircraft operation take into account passenger oxygen concerns:<br><br>(O) May be inoperative provided:<br>a) Cabin differential pressure indication is operative,<br>b) Cabin pressurization auto schedule is operative, and<br>c) A chart is provided and used to convert aircraft altitude and differential pressure to cabin altitude.<br><br>It should also be noted that fuel burn may be affected from operations at lower altitudes for turbine powered aircraft. | |
| Cessna Aircraft Company | 21-30-4<br><br>Cabin Altitude Warning System | If the aircraft has been demonstrated to be able to operate at a higher altitude than 10,000 feet MSL without any warning system issues and oxygen requirements permit, the aircraft should be able to operate at a higher altitude. Consider aircraft with oxygen systems such as the Cessna P210.<br><br>Is the issue discussed above intended to be addressed between 4A and 4B? If so, this should be made clearer. | |
| Cessna Aircraft Company | 21-30-5<br><br>Cabin Rate of Climb | Cessna recommends the following provisos:<br><br>May be inoperative provided:<br>a) Cabin altimeter is operative,<br>b) Cabin differential pressure gauge is operative | |
| Cessna Aircraft Company | 21-30-6<br><br>Differential Pressure Indicator | Cessna finds it prudent to recommend the following proviso to make sure aircraft operation take into account passenger oxygen concerns:<br><br>(O) May be inoperative provided:<br>a) Cabin differential pressure indication is operative, and<br>b) A chart is provided and used to convert aircraft altitude and differential pressure to cabin altitude.<br><br>It should also be noted that fuel burn may be affected from operations at lower altitudes for turbine powered aircraft. | |
| Cessna Aircraft Company | 21-50-1<br><br>Air Conditioning System | If the proviso for this item requires a (M) Maintenance procedure, the proviso should make reference to what must be accomplished. Once the document is published as final, will the narratives below the proviso be included so the manufacturer/STC holder knows exactly what to write for a procedure?<br><br>As the proviso is currently drafted, the requirements for the (M) are unclear. | Recommend a proviso that makes it very clear what the intent of the (M) are. An example could read as below:<br><br>(M) May be inoperative provided system is deactivated. |
| Cessna Aircraft Company | 33-20-1<br><br>Passenger Compartment Lighting | Cessna feels the D RI item is too restrictive. Because the passenger lights are not associated with the emergency lighting system, there should be no reason to restrict night operations with passengers. | |

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| Cessna Aircraft Company | 34-10-1<br><br>Primary Airspeed Indication | For the NCO/SPO relief, Cessna feels this relief can potentially allow an aircraft with a glass cockpit to dispatch with an inoperative primary airspeed indicator that is associated with an emergency bus. | It is recommended that the a) proviso item be re-written to reflect systems on the emergency bus. An example is below:<br><br>May be inoperative provided indication is not associated with emergency procedures. |