

# That MMEL Thing: Here's an Update

David Mumford

16 April, 2024



It looks like there might finally be a solution to the long-running **MEL vs MMEL issue for US operators headed to Europe**, keen to **not get a ramp check finding!**

## **The *brief* Backstory**

Since 2017, US aircraft have been getting hit with ramp check findings in Europe because EASA decided that the **D095 LOA** wasn't good enough – they wanted to see a **D195 LOA** instead, but it was taking operators a long time to get these approved by the FAA in the US due to a big backlog of applications.

## **The Solution**

The FAA has published an updated Advisory Circular (AC 91-67A) which **speeds up the process of getting this D195 LOA**.

The NBAA have reported that the FAA has also updated guidance to its field offices, who will now issue the LOA after a brief review, provided the application is accompanied by an “attestation letter”.

## **The *slightly longer* Backstory**

Over the past few years, ramp checks on some US aircraft in Europe highlighted an important issue – EASA and the FAA have **different interpretations of the ICAO standards** regarding deferring aircraft discrepancies.

In the US, with FAA authorization operators can use a master minimum equipment list (MMEL) to defer repairing certain equipment. But in Europe, **MMEL cannot be used in lieu of an MEL specific to each aircraft or fleet**.

The European Aviation Safety Agency (EASA) began requiring all aircraft transiting European airspace to have an approved Minimum Equipment List (MEL) for each, individual aircraft (i.e. a **D195 LOA**). An MEL that references the MMEL was not acceptable (i.e. a **D095 LOA**).

This was a pain for US operators, as to get an individual MEL approved under the LOA from the FAA takes time – but by not doing so, they ran the risk of **getting a ramp check finding** in a European country. (France seems to be the place where this happens most often!)

At the start of 2018, the rumour was that the FAA and EASA reached an agreement: the FAA would start requiring international operators with D095 LOAs to obtain new D195 LOA's instead, and in return **EASA would halt any findings** for a period of 12 months to allow for these new LOA's to be issued. There was no official announcement on this, but SAFA data did indicate that ramp check findings for use of D095 were greatly reduced for a time.

The FAA proposed a policy change to **phase out the D095 LOA** over the next 3-5 years, and to work out a streamlined approval process to **issue everyone with D195's instead**.

The French CAA said they would **stop issuing ramp check findings** once the FAA has launched the new policy.

FSDOs across the US then started processing the **backlog of D195 requests** from operators (there were lots!). In the meantime, US operators with the D095 LOA continued to face the same old MMEL findings on ramp checks in Europe.

## How to prepare for a ramp check in Europe?

Here's the article we wrote all about how to make a ramp check painless.

And here is a copy of the OPSGROUP SAFA Ramp Checklist. Download it here.



| Ramp Inspection Checklist (SAFA)                                                                    |           |               |                                                         |               |                  | DOC NO<br>REV<br>DATED<br>PAGE | OPG/SAFA-CL<br>07<br>01 JAN 2020<br>1 OF 3 |
|-----------------------------------------------------------------------------------------------------|-----------|---------------|---------------------------------------------------------|---------------|------------------|--------------------------------|--------------------------------------------|
| Operator                                                                                            | Date      | Flight No.    | Location                                                | Aircraft Type | Registration No. |                                |                                            |
| Captain                                                                                             | Cert. No. | First Officer | Other Crew                                              | Lead F/A      | Inspector        |                                |                                            |
| S – Satisfactory; U – Unsatisfactory; P – Potential; I – Information; E – Exceeds; N – Not Observed |           |               |                                                         |               |                  |                                |                                            |
|                                                                                                     |           | Code          | Item                                                    | Checked       | Remarks          |                                |                                            |
| A. Flight Deck                                                                                      |           | A01           | General condition                                       |               |                  |                                |                                            |
|                                                                                                     |           | A02           | Emergency exit                                          |               |                  |                                |                                            |
|                                                                                                     |           | A03           | Equipment                                               |               |                  |                                |                                            |
| Documentation                                                                                       |           | A04           | Manuals                                                 |               |                  |                                |                                            |
|                                                                                                     |           | A05           | Checklists                                              |               |                  |                                |                                            |
|                                                                                                     |           | A06           | Navigation/instrument charts                            |               |                  |                                |                                            |
|                                                                                                     |           | A07           | Minimum equipment list                                  |               |                  |                                |                                            |
|                                                                                                     |           | A08           | Certificate of registration                             |               |                  |                                |                                            |
|                                                                                                     |           | A09           | Noise certificate (where applicable)                    |               |                  |                                |                                            |
|                                                                                                     |           | A10           | AOC or equivalent                                       |               |                  |                                |                                            |
|                                                                                                     |           | A11           | Radio license                                           |               |                  |                                |                                            |
|                                                                                                     |           | A12           | Certificate of Airworthiness                            |               |                  |                                |                                            |
|                                                                                                     |           | A13           | Flight preparation                                      |               |                  |                                |                                            |
| Flight Data                                                                                         |           | A14           | Mass and balance calculation                            |               |                  |                                |                                            |
|                                                                                                     |           | A15           | Hand fire extinguishers                                 |               |                  |                                |                                            |
| Safety Equipment                                                                                    |           | A16           | Life jackets / flotation device                         |               |                  |                                |                                            |
|                                                                                                     |           | A17           | Harness                                                 |               |                  |                                |                                            |
|                                                                                                     |           | A18           | Oxygen equipment                                        |               |                  |                                |                                            |
|                                                                                                     |           | A19           | Independent portable light                              |               |                  |                                |                                            |
|                                                                                                     |           | A20           | Flight crew license/composition                         |               |                  |                                |                                            |
| Journey Log Book / Technical Log or Equivalent                                                      |           | A21           | Journey log book or equivalent                          |               |                  |                                |                                            |
|                                                                                                     |           | A22           | Maintenance release                                     |               |                  |                                |                                            |
|                                                                                                     |           | A23           | Defect notification and rectification (Int. Tech. Log)  |               |                  |                                |                                            |
|                                                                                                     |           | A24           | Pre-flight inspection                                   |               |                  |                                |                                            |
| B. Safety / Cabin                                                                                   |           | B01           | General internal condition                              |               |                  |                                |                                            |
|                                                                                                     |           | B02           | Cabin crew station and crew rest area                   |               |                  |                                |                                            |
|                                                                                                     |           | B03           | First aid kit / emergency medical kit                   |               |                  |                                |                                            |
|                                                                                                     |           | B04           | Hand fire extinguishers                                 |               |                  |                                |                                            |
|                                                                                                     |           | B05           | Life jackets / flotation device                         |               |                  |                                |                                            |
|                                                                                                     |           | B06           | Seat belts and seat condition                           |               |                  |                                |                                            |
|                                                                                                     |           | B07           | Emergency exit, lighting and independent portable light |               |                  |                                |                                            |
|                                                                                                     |           | B08           | Slides / life rafts (as required), ELT                  |               |                  |                                |                                            |
|                                                                                                     |           | B09           | Oxygen supply (cabin crew and passengers)               |               |                  |                                |                                            |
|                                                                                                     |           | B10           | Safety instructions                                     |               |                  |                                |                                            |

Keep a copy with you and run through it before you head to Europe.

## **Further Reading**

- SAFA Ramp Checks: The Top 5 Offenders
- SAFA Ramp Checks - Guidance Material
- How are ramp checks performed?