

That MMEL Thing: Here's an Update

David Mumford

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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)

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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		
	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		
Documentation	A11	Radio license		
	A12	Certificate of Airworthiness		
	A13	Flight preparation		
	A14	Mass and balance calculation		
	A15	Hand fire extinguishers		
	A16	Life jackets / flotation device		
	A17	Harness		
	A18	Oxygen equipment		
	A19	Independent portable light		
	A20	Flight crew license/composition		
Flight Crew	A21	Journey log book or equivalent		
	A22	Maintenance release		
	A23	Defect notification and rectification (Int. Tech. Log)		
	A24	Pre-flight inspection		
	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		
B. Safety / Cabin	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?