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**.

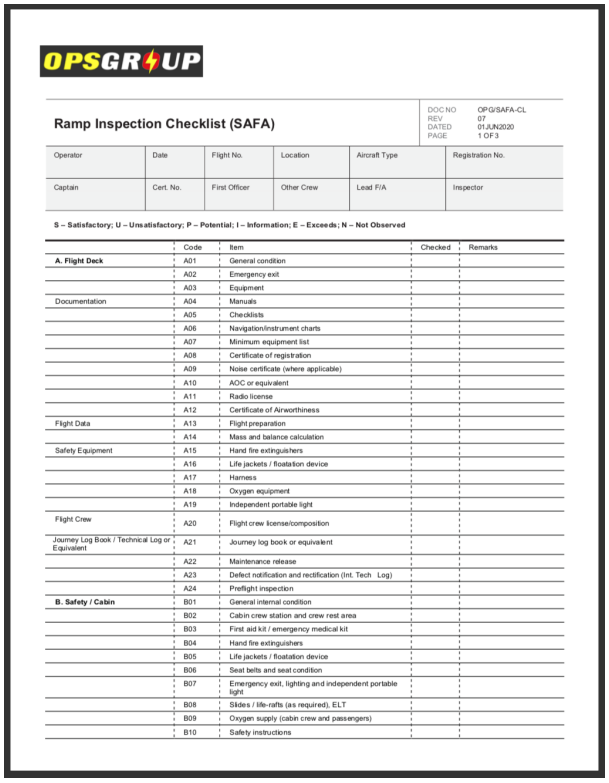
The French CAA said they would **stop issuing ramp check findings** once the FAA has launched the new policy.

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.



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Ramp Inspection Checklist (SAFA)

DOC NO OPG/SAFA-CL
REV 07
DATED 01JUN2020
PAGE 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		
Flight Data	A13	Flight preparation		
	A14	Mass and balance calculation		
Safety Equipment	A15	Hand fire extinguishers		
	A16	Life jackets / floatation device		
	A17	Harness		
	A18	Oxygen equipment		
	A19	Independent portable light		
Flight Crew	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	Preflight 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 / floatation 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?

Introducing MEL: A guide to Minimum Equipment Lists

OPSGROUP Team
16 April, 2024

Setting up your MEL can be a tricky business. It is definitely not something we know anything about. Thankfully though, we know some folk who do. AviationManuals have just issued an updated version of their **MEL guide** for clear info on what you need, how to use it, and how to maintain it.

So here is *a little guide to their guide*, plus some other things we think you might find helpful as well.

Why are we telling you about MELs?

Because it's easy to get confused about **what equipment is needed in certain areas**, or to do certain things, or to go certain places.

So, first up, a quick **"what's the difference?"** – when do you consult your MEL, and when do you consult the AIP or some other regulation document?

The MEL is all about your aircraft.

Actually, probably a better way to put it is it is all about your **aircraft's ability to fly *safely,*** *a*s opposed to being about **specific operations** it might want to do. The MEL can tell you whether, if you try to get airborne, it might become a bit of a *Lethal Weapon…*

More accurately, it is what **"makes it possible to temporarily operate with inoperative equipment or instruments."**

Can it safety fly without Datalink? Yes. Can it safely fly without the nose wheel attached? No. The MEL will make that clear. It will also tell you **how long you can operate** without something being fixed, provides **amended procedures** (if needed) and **maintenance guidance.**

So – the MEL is a "Can I fly?" tool.

What you need to remember though is even if your MEL allows you to go fly, you still need to check that ***where you are going to fly*** doesn't need that bit equipment or instrument. This is the gotcha.

Can I safely fly without Datalink working? Yes, the MEL says I can. So I am good to go on my flight through the NAT HLA? Well, hang on, that's a different thing you're asking. Your aircraft can can fly perfectly well without it, but you are going to have some **planning considerations.**

Do you have anymore examples of this?

We said it once, and we'll add it in again – even after establishing via the MEL that it is safe to go, you still need to confirm you are **capable and compliant in the airspace you are planning on flying through**, and that is not what your MEL is telling you.

The NAT HLA is probably the best and clearest one, but there are a lot of places and situations that this might be the case.

Your autopilot for example is not necessarily an **MEL items**, meaning you could take that airplane without it functioning. It would be annoying. It would make drinking coffee more difficult, but you could. However, if you want to fly through **RVSM airspace then an autopilot is a requirement.** So what the MEL might let you go without, the airspace you want to go to might not.

So, the MEL is confirming what your airplane needs to safely fly, but it is not (necessarily) confirming that your aircraft will meet all the capability requirements for where it is planning to fly.

When should you use your MEL?

Basically anytime before you start your takeoff roll, because it is the document that is going to guide you on whether your airplane needs what just broke to safely get up (and stay up) in the air. Once rollin' though, your failure warning system is what you're going to want to be consulting.

But an MEL is also a handy reference to consult in the air (when you've done everything else) because it will help you plan for the other end – can you dispatch without that 'whatever just broke' working. When you're back on the ground the MEL is going to become the "controlling" document once more, so it is worth a look.

OK, I understand the MEL's purpose, but…

We have gotten to the bottom of how, and what, to use the MEL for, and what its intentions and limitations are. But I know what your next question will be –

*"I already have an **MMEL**, so why can't I just use that?"*

The MMEL is a Master Minimum Equipment list. This is made by the authority and the aircraft manufacturer for the aircraft type *in general.* Some of what is in it might not be useful for you though because you might not actually have all the equipment installed. Maybe you didn't want it, or maybe your airplane is just a way more modern version of the *type* that the massive all inclusive MMEL is covering.

Which is why you want an MEL.

It is tailored to your actual aircraft, and your operation and procedures. This makes it shorter, easier to use and more relevant (but not less restrictive).

Now, the FAA do allow **Part 91** operators to use their MMEL as an MEL. You need a **D095 LOA** and some other paperwork for this. But a lot of places don't allow this, or just aren't used to it, so you're probably going to need an MEL (not just the MMEL) if you're heading abroad.

An MEL is actually a requirement for dispatch so if they don't accept your MMEL as an MEL you could be in for some lengthy debates and delays if you're ramp checked.

Here's something we wrote about it back in 2019 when it started to become a thing.

The FAA are also planning to do away with the D095 in the possibly not too distant future, meaning all US operators will need a D195 – the custom MEL.

In case you aren't familiar with the terms, **Part ORO** *"establishes organisational requirements to be followed by an* ***air operator conducting specialised and non-specialised commercial air operations*** *and specialised and non-specialised non-commercial air operations with complex motor-powered aircraft."*

Part NCC refers to "*non-commercial operations with complex motor-powered aircraft."* So chances are this is going to apply to you and your aeroplane.

Our Guide to their Guide

The AviationManual folk put it better than we can so go check out the website for info on what is involved in the MEL setting up process.

It does look fairly simple though:

- Complete a simple questionnaire
- Get a copy of the draft manual for your review
- Send feedback (and probably some money at some point) and receive your Final Copy. And off you go.

That's it!

A summary of who to ask?

"I need an MEL written up" – Talk to the folk at AviationManuals, they can help. Here is the link direct to their guide.

"I am on my airplane, ready to go on a flight and something has broken" – Consult your MEL.

"I am flying and something has broken, is my MEL useful now?" – Check your checklist and read through your FCOM. When you've done that, know the plan and have a few minute to spare, take a look in the MEL as well to see if it will cause issues for the return flight.

"I am a Flight Planning Person and I've just been told that an aircraft is flying tomorrow but its *insert something random* isn't working, can it still fly on the usual route?" – Check the AIP, or drop us a quick email and we'll see if we can fathom it out for you.

European Ramp Checks – most popular questions from inspectors

Declan Selleck
16 April, 2024

Of late, the level of interest in **OpsGroup** for **European Ramp Checks** has been very high. There has been a lot to think about. First, we discovered in March that French inspectors had started recording a finding for operators that were using the Manufacturer MEL instead of a customized one, and it turned out that across EASA-land inspectors were raising the same issue. **There is an update on that below**.

One of our members posted a great list of the most popular findings/issues raised by EASA Inspectors in the last 12 months, together with the skinny on "**how to fix these**, so you don't get a finding".

So, first let's look at the Top 3 Categories, with the subset questions, and then an update on the D095 MMEL/MEL issue.

Popular European Ramp Check Items

Visiting and locally based aircraft may be subjected to ramp inspections as part of a States' Safety Programme. The EU Ramp Inspection Programme (EU RIP) is one such inspection regime which currently has 48 participating states. The EU Ramp Inspectors review findings and use this intelligence as a basis for prioritising areas to inspect during a ramp check.

The most frequent findings and observations raised since January 2016 follow. This information can be used to help avoid similar findings being raised during future ramp inspections on your aircraft.

Most Frequent Findings

The **main 3 categories of findings**, relate to: Minimum Equipment Lists, Flight Preparation and Manuals.

1. Under the category of **Minimum Equipment List**, the finding is.
• MEL not fully customised.

2. Under the category of **Flight Preparation**, the main findings are:
• PBN Codes recorded on the flight plan which the operator did not have operational approval for
• Use of alternates which were not appropriate for the aircraft type; and
•[blur]Use of alternate airports which were closed[/blur]

[blur]3. Under the category of **Manuals**, the main finding is.
• AFM was not at the latest revision.[/blur]

[blur]Simple Steps to Avoid Similar Findings[/blur]

[blur]1. Review your MEL, especially amendments made to the MEL after the initial approval, and ensure it is fully customised:

- Where the MMEL and/or TC holders source O&M procedures require the operator to develop 'Alternate Procedures' or 'Required Distribution' etc. these must be specified in the operators MEL and/or O&M procedure;[/blur]

Full report in your **OpsGroup Dashboard,** including the standard ramp checklist PDF**:**

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1. **OPSGROUP Members**, login to the Dashboard and find it under "Publications > Notes to Members". All FSB content like this is included in your membership, **or**
2. **Join OPSGROUP** with an individual, team, or department/airline plan, and get it free on joining (along with a whole bunch of other stuff), **or**