



# Workshop on the Operational Suitability Data OSD Master Minimum Equipment List

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Référence

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- MMEL framework exists for a long time
  - Part of former (J)OEB process
  - All involved actors have good knowledge/skills in the MMEL business
- Introduction of CS-MMEL within the TC does not modify the way the MMEL has been always handled.

# GrandFathering of existing MMEL



- Feed-back from MMEL grandfathering process is positive
- Definition of initial certification bases is also considered acceptable
- However, application of certification mechanisms, especially 21.A.101, will have to be carefully monitor in order to avoid undue burden on MMEL (TC Holder and Operators)
  - Notion of « Significant Change »

# Acceptable Level of Safety



- CS-MMEL is performance-base written
- TC Holder should define their own MMEL justification methodology ... to be accepted by EASA
- « Acceptable level of Safety as intended by the applicable requirements » should remain understood the way it was before the OSD.
  - Do not try to address compliance to CS-25 requirements
- « Sound Engineering Judgement » should remain available for MMEL justification
  - Intent is not to certify MMEL like a full Type Certificate but for a short repair interval (basically less than twice 10 days)

# Acceptable Level of Safety (Cont'd)



- However, there is one area where the CS-MMEL is prescriptive: complement to the qualitative analysis when specific conditions are met
- This requirement is derived from the conclusions of an international working group (ASAWG)
- We noticed the EASA goes beyond the prescription by requesting to look for the so-called « 1+1 » (1 evident + 1 latent failures) for catastrophic failure conditions
  - Didn't we go too far ?

# Room for Operators



- Even if CS-MMEL aims at making the TC Holder responsible for providing the necessary dispatch data, one cannot claim that TC Holders can and have to be responsible for all
- Room should be given for operators to cope with their own specificities:
  - TC Holder should not always be required to provide detailed operating or maintenance procedures, but
  - TC Holder should be required to provide the intent of those procedures toward the operators so as they develop their appropriate procedures

# MMEL and DOA



- MMEL being now part of Type Certificate, TC Holder DOA will be enlarged to encompass OSD aspects by Dec. 18, 2015
- MMEL Changes will be subject to « Minor/Major » classification
- DOA privileges will apply:
  - Minor Changes to MMEL will be approved by TC Holder under its DOA privileges,
  - MMEL data may be directly published in an appropriate format as soon as approved
- As MMEL is not a « new-to-be discovered » subject, we encourage TC Holders to propose (and EASA to accept) classification criteria based on organization exposure to MMEL.

# Evolution of CS-MMEL



- Under the (J)OEB umbrella, update of JAR-MMEL/MEL, aka TGL 26, was handled by an Industry - Authorities working group
- The spirit of this good practice should be kept
- Evolution to CS-MMEL should be handled by EASA-Industry working Group, as it should reflect the state of the art of the Industry
- In any way, it must not be handled via the Cert Memo process, or via any other means.



# MMEL at International Level



- Upon European Industry initiative, MMEL is the first OSD Constituent proposed to be part of the Bilateral Agreement (EASA, FAA, TCCA, ANAC).
- An Authorities Working Group has been set up to work on these proposals
- The advantages of MMEL being part of T.I.P are:
  - MMEL Change will be classified Major Level 1/Major L 2
  - Only Major L1 will be forwarded for validation to Foreign Authorities
  - Foreign MMEL under T.I.P will be directly published by the TC Holder

# Toward « Full » e-MMEL



- It is expected that electronic authoring and publication will be the basis for MMEL in the future
- In that scheme, the current Revision process will be obsolete:
  - Live MMEL flow will be used,
  - MMEL Data will be approved, then published in electronic format without any « paper » support
- Even if already provisionned in CS-MMEL, there is a need for collaboration between Industry and EASA to achieve this goal

# Thank You for your attention !

