

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-035

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Commenter 1: All Nippon Airways – Takuma Koga – 23/03/2021

Comment # 1

In the Required Action(s) and Compliance Time(s) section, MMEL Changes / Dispatch Restrictions.(1), it is instructed for the operators to amend the MMEL. However, amending the MMEL is what the manufacturers do and where the operators are not able to.

From this point, the required action should be to "amend the operator MEL per the MMEL, which includes the instructions of the MER.

EASA response:

Comment noted. The commenter is correct that the revised EASA-approved MMEL publication is a task to be done by the TC holder. However, each operator is expected to hold a controlled copy of that MMEL, necessary for creating and amending, as necessary, the operator MEL. This is similar to the approved AFM, used by the operator to create and amend, as necessary, the operators' (customised) Operating Manual (OM). Changes to either operator MEL or OM need approval by the competent authority of that operator.

EASA ADs can require implementation of MMEL and AFM changes because these are EASA-approved documents.

The AD requires the operator to amend/revise the operator-controlled copy of the MMEL and ensuring that the aeroplane is operated accordingly. Updating the operator MEL accordingly is a process that does not affect EASA, as outlined above.

No changes have been made to the Final AD in response to this comment.