NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.617

National Policy

Effective Date:
3/15/22

Cancellation Date:
3/15/23

SUBJ: Operator Use of Engineering Change Authorizations (EA), Engineering Change Orders (EO), and/or Other Acceptable Maintenance Methods Applicable to Minimum Equipment List (MEL) Items

1. Purpose of This Notice. This notice provides guidance to Flight Standards Service (FS) aviation safety inspectors (ASI) for oversight of an approved minimum equipment list (MEL) and MEL management program. This notice reissues and extends the applicability of Notice N 8900.586, Operator Use of Engineering Change Authorizations (EA), Engineering Change Orders (EO), and/or Other Acceptable Maintenance Methods Applicable to Minimum Equipment List (MEL) Items.

2. Audience. The primary audience for this notice is FS ASIs who have certificate management oversight responsibilities for operators utilizing an MEL. The secondary audience includes Flight Standards divisions and branches and the Aircraft Evaluation Division (AFS-100).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices, the Flight Standards Information Management System (FSIMS) at https://fsims.avs.faa.gov, and the Dynamic Regulatory System (DRS) at https://drs.faa.gov. Operators and the public can find this notice on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/orders_notices, FSIMS at https://fsims.faa.gov, and the DRS.

4. Cancellation. This notice cancels Notice N 8900.586, Operator Use of Engineering Change Authorizations (EA), Engineering Change Orders (EO), and/or Other Acceptable Maintenance Methods Applicable to Minimum Equipment List (MEL) Items, dated March 16, 2021.

5. Background. Operators are required to accomplish Maintenance (M) and Operations (O) procedures contained in their FAA-approved MEL prior to dispatch and operation of the aircraft with inoperative equipment. Operators commonly perform additional maintenance procedures to disable and/or troubleshoot inoperative equipment or systems in accordance with Engineering Change Authorizations (EA), Engineering Change Orders (EO), or other acceptable methods during the MEL deferral period.

6. Guidance.

a. Maintenance on Inoperative Instruments or Equipment. The presence of an M or O procedure symbol indicates that a specific M or O procedure is required to be accomplished. The operator may perform additional maintenance for troubleshooting or increased safety of the inoperative MEL item. The additional maintenance may be more restrictive, but must not be less restrictive than the MEL. Such maintenance may be performed in accordance with the operator's MEL management program, which may include the use of an operator-produced EA, EO, or other methods acceptable to the Administrator. The procedures developed by the operator must include detailed instructions.

b. Components of MEL Items and Warning/Caution Systems. Defective components of an MEL item (e.g., chafed or broken wiring, an inoperative switch, or a worn electrical connector) that are directly associated with and have no function other than supporting the MEL item, component, or system being deferred per the MEL can be inoperative as part of the MEL action. Defective components of an MEL item (e.g., engine or auxiliary power unit (APU) bleed duct systems with chafed hole(s) or leaking) that are directly associated with and have function(s) other than supporting the MEL item, component, or system cannot be deferred per the MEL. However, warning or caution systems associated with the inoperative system must be operative unless relief is specifically authorized in the Master Minimum Equipment List (MMEL).

c. Securing and Deactivating Inoperative MEL Items. The certificate holder's (CH) procedures should describe the methods for securing, labeling, identifying, and deactivating an inoperative MEL item. Procedures for these methods should be clearly documented in the CH's manual system. Such tasks must be performed in accordance with instructions contained in the CH's maintenance manuals. Such tasks include, but are not limited to:

- Disconnecting and securing an electrical connector;
- Draining and/or capping hydraulic, fuel, water, or pneumatic lines;
- Pulling and collaring circuit breakers; and
- Capping and stowing electrical wires (provided there is no effect on another system or component).

d. Maintenance Instructions. An EA or EO produced in accordance with the CH's MEL management program is an acceptable method for supplementing current aircraft maintenance manual procedures for establishing, clarifying, or adding to maintenance instructions for securing, labeling, identifying, and deactivating a defective component or inoperative system, but cannot be less restrictive than the MMEL.

e. Approval or Acceptance of Maintenance Procedures. FAA certificate management oversight Flight Standards District Office (FSDO)/certificate management office (CMO) approval or acceptance of such procedures is only necessary at the level of the CH's MEL management program and does not extend to the review and acceptance of engineering documents. All MMEL M and O procedure symbols are required to be included in the operator's MEL. All such maintenance must be documented in the aircraft records, such as the aircraft logbook. During the deferral period, the operator may work/repair/diagnose/analyze the deferred

MEL item in accordance with the related manual requirements or EAs or EOs. The MEL repair category will remain as the control for the time limits in the MEL deferral process.

7. Action. Provide operators with guidance for additional maintenance action(s) when disabling equipment and/or systems in conjunction with an MEL.

8. Disposition. We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions or comments concerning the information in this notice to the Aircraft Maintenance Division (AFS-300) at 202-267-1675.



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