MMEL Policy Letter (PL) 73, Revision 5

Date: June 15, 2011
To: All Region Flight Standards Division Managers
    All Aircraft Evaluation Group Managers
From: Manager, Air Transportation Division, AFS-200
Reply to Attn of: Manager, Technical Programs Branch, AFS-260

SUBJECT: MMEL Relief for Emergency Medical Equipment

MMEL CODE: 25 (Equipment & Furnishings)
REFERENCE: PL-73, Revision 4, dated April 18, 2006
            PL-73, Revision 3, dated September 24, 2004
            PL-73, Revision 2, dated September 19, 2001
            PL-73, Revision 1, dated August 15, 1997
            PL-73, Original, dated March 4, 1994

PURPOSE:
To provide standardized Master Minimum Equipment List (MMEL) requirements for the deferral of approved emergency medical equipment, including Emergency Medical Kits (EMK), First Aid Kits (FAK), and Automated External Defibrillators (AED).

DISCUSSION:
Revision 5 reduces the number of cycles/flights to one cycle/flight for incomplete, missing, or inoperative EMKs, FAKs, and AEDs.

Revision 4 provided limited dispatch authority for EMKs, FAKs and/or AEDs that do not meet minimum FAA requirements.

Revision 3 provided clarifies that equipment in excess of FAR associated with Emergency Medical Equipment can be missing or inoperative.

Revision 2 expanded previous MMEL relief for FAKs to include relief for all Emergency Medical Equipment.

Revision 1 reformatted policy letter 73 with no change to policy.

Emergency Medical Equipment is required by Title 14 Code of Federal Regulations (14 CFR) which set forth the required number of EMKs, FAKs, and AEDs.
In order to support operational issues associated with the use of Emergency Medical Equipment, operators may elect to have additional equipment installed associated with CFR required equipment. Examples of associated equipment includes: additional items in the EMK, FAK or AEDs, kit seals, Sharps Container, Infection Control Kit, etc.

In response to the Aviation Medical Assistance Act of 1998, the FAA issued a final rule dated April 12, 2001, titled Emergency Medical Equipment. The final rule requires that air carrier operators carry AEDs on passenger carrying aircraft and augment current EMKs. The final rule required operators to comply by April 12, 2004.

After diversion due to an in-flight medical event, replacement and replenishment of the Emergency Medical Equipment may be hindered by factors beyond the operator’s control. This situation has the potential to expose a large number of passengers to more risk at the diversion airport than there would be if the aircraft was dispatched i/a/w the MMEL.

POLICY:  
This policy authorizes continued operation for a maximum of one flight to a location where Emergency Medical Equipment repairs or replacements can be made.

The following standard MMEL proviso and repair category is adopted to provide standardization among all MMELs.

<table>
<thead>
<tr>
<th>25 Equipment &amp; Furnishings</th>
<th>A</th>
<th>0</th>
<th>(O) May be incomplete, missing or inoperative provided:</th>
</tr>
</thead>
<tbody>
<tr>
<td>25-XX Automatic External</td>
<td>A</td>
<td>-</td>
<td>a) AED is resealed in a manner that will identify it as a unit that can not be mistaken for a fully serviceable unit, and</td>
</tr>
<tr>
<td>Defibrillator (AED) and/or</td>
<td></td>
<td></td>
<td>b) Repairs or replacements are made within 1 flight.</td>
</tr>
<tr>
<td>Associated Equipment</td>
<td>D</td>
<td>-</td>
<td>Any in excess of those required by CFR may be incomplete, missing, or inoperative.</td>
</tr>
<tr>
<td>Emergency Medical Kit</td>
<td>A</td>
<td>-</td>
<td>(O) May be incomplete, missing or inoperative provided:</td>
</tr>
<tr>
<td>(EMK) and/or Associated</td>
<td></td>
<td></td>
<td>a) EMK is sealed in a manner that will identify it as a unit that can not be mistaken for a fully serviceable unit, and</td>
</tr>
<tr>
<td>Equipment</td>
<td>D</td>
<td>-</td>
<td>b) Repairs or replacements are made within 1 flight.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Any in excess of those required by CFR may be incomplete, missing, or inoperative.</td>
</tr>
</tbody>
</table>
First Aid Kit (FAK) and/or Associated Equipment

A - - (O) If more than one is required by CFR, only one of the required FAKs may be incomplete, missing or inoperative provided:

a) FAK is resealed in a manner that will identify it as a unit that cannot be mistaken for a fully serviceable unit, and

b) Repairs or replacements are made within 1 flight.

D - - Any in excess of those required by CFR may be incomplete, missing, or inoperative.

Each FOEB Chairman should apply this Policy to affected MMELs through the normal FOEB process.

/s/ Greg Kirtland for 7/18/2011

John S. Duncan
Manager, Air Transportation Division