



# Federal Aviation Administration

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## MMEL Policy Letter (PL) 109, Revision 1

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Date: 11/07/2019  
To: Manager, Aircraft Evaluation Division (AFS-100)  
All Aircraft Evaluation Group Managers  
From: Manager, Air Transportation Division (AFS-200)  
Reply to Attn of: Manager, New Program Implementation Branch (AFS-240)

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**SUBJECT: Supplemental Type Certificate (STC) MMEL/MEL Relief Process**

MMEL CODE: 00 (GENERAL)

REFERENCE: PL-109 Revision Original, dated December 13, 2001  
14 CFR Part 91, § 91.213  
14 CFR Part 91, § 91.1115  
14 CFR Part 121, § 121.628  
14 CFR Part 125, § 125.201  
14 CFR Part 129, § 129.14  
14 CFR Part 135, § 135.179  
Advisory Circular (AC) 21-40 (as revised)  
FAA Order 8110.4 (as revised)  
FAA Order 8110.115 (as revised)  
FAA Order 8110.120 (as revised)

**PURPOSE:**

The purpose of this PL is to provide guidance on how to obtain MMEL/MEL relief for items associated with STCs.

**DISCUSSION:**

Revision 1: The aircraft design approval holder (DAH) determines the configuration of the aircraft, the items installed, and the official parts listed during the initial aircraft type certification process conducted at the time of manufacture. Any subsequent installation or removal of items may only be accomplished through an STC, an engineering order, or other FAA-approved or accepted data (as appropriate). An STC is the FAA's approval of a major change in the type design of a previously type-certificated product. The Aircraft Evaluation Group (AEG) must evaluate all STC applicant/holder requests for MMEL/MEL relief, which normally occurs during the STC certification process when requested by the STC applicant. Nonessential equipment and furnishings (NEF) items are excluded from these requirements. Relief for administrative control items (ACI) is listed elsewhere in the operator's manual system and is also excluded from these requirements.

## POLICY:

Operators may not add items installed via an STC into their MELs, nor may they exercise MEL relief for items installed via an STC until that item has been evaluated by the AEG and relief is granted. MEL relief for items installed or removed through methods other than an STC that affect the aircraft's existing type certificate (TC) must also be coordinated through the AEG and the Flight Operations Evaluation Board (FOEB) process before relief is exercised.

The STC applicant or holder is the point of contact (POC) for all matters regarding relief for their STC(s). Operators desiring MEL relief must consult directly with the STC applicant or holder for such relief.

The STC applicant involved in the certification of an STC shall submit a request for MMEL relief in accordance with the FOEB MMEL Agenda Coordination Process if MMEL/MEL relief is desired (see FAA Order 8900.1, Volume 8, Chapter 2, Section 3, and AC 21-40, as revised). This submission should be made early in the certification process to allow MMEL/MEL evaluation concurrent with the certification process. If an STC applicant does not submit a request for MMEL/MEL relief during the certification process, the STC, and/or items installed via the STC, will not be a candidate, or be considered, for MMEL/MEL relief until an evaluation has been conducted by the AEG upon request by the STC holder. An operator may not submit a request for MMEL/MEL relief during certification on behalf of the STC applicant.

STCs certified before this amended policy existed may be granted relief by request from the STC holder (owner) to the AEG through the FOEB process. STCs listed by STC number in the applicable aircraft MMEL may also be added to operator's MEL through the normal revision process without further AEG evaluation. STC holders should refer to Volume 8, Chapter 2, Section 3 for additional information on this process and submission criteria. An operator may not submit a request for MMEL/MEL relief on behalf of the STC holder unless that submission is in accordance with Order 8110.120 and the operator is considered a *qualified applicant* by the AEG. See *qualified applicant* discussed below for additional information.

If the requested relief is granted, the AEG will submit an approval letter directly to the FAA's Flight Standards Information Management System (FSIMS). FAA personnel may access these approval letters at <http://fsims.avs.faa.gov> under "Publications," "STC Relief Approval Letters." Non-FAA employees may access these approval letters at <http://fsims.faa.gov> under "Publications," "STC Relief Approval Letters." The approval letter will contain the allowed relief, including conditions, provisos, along with remarks or exceptions. Approval letters will be dated and have revision numbers. Operators may amend their MEL(s) with the relief for the STC(s) in accordance with the AEG approval letter through the normal MEL revision process. Paper copies of the AEG approval letter are also acceptable in lieu of the FSIMS database.

Operators wishing to add relief into their MEL(s) for an STC through an MMEL PL with a global change (GC) designation are not required to have an approval letter from the AEG for each STC to be added. However, upon AEG evaluation of the item, operators may have to amend or remove previously approved relief in their MEL(s). See FAA Order 8900.1, Volume 4, Chapter 4, Section 3 for additional information on an GC.

STCs held by applicants or holders that do not support relief for their STC(s) will not be candidates, or be considered for MMEL/MEL relief. However, an STC that is surrendered or abandoned by the STC holder may be a candidate for MMEL/MEL relief on a case-by-case basis. In such instances, upon request to the appropriate AEG office, a *qualified applicant* may act in the place of the STC holder regarding the process to gain MMEL/MEL relief for the STC(s). A *qualified applicant* is an individual

or organization that can act on behalf of the STC holder for matters when an STC is considered abandoned or surrendered. A *qualified applicant* must successfully follow the process outlined in Order 8110.120, with data that can support the FOEB process regarding the STC. In such cases, if MEL relief is approved for the STC(s), and/or items installed via the STC(s), the approval letter(s) will be issued only to the *qualified applicant*. Other operators desiring the same relief extended to the *qualified applicant* need to produce like data and be considered a *qualified applicant* on their own behalf. Relief in these cases would only be issued to the *qualified applicant* and exercised only by that applicant, operator, or organization (cannot be shared by other operators or organizations without producing similar data). The *qualified applicant* process is not applicable for operators desiring relief for STCs where the STC holder is still operating but does not support such relief. Please refer to Order 8110.120 for additional information on surrendered or abandoned STCs.

ORIGINAL SIGNED by

/s/ Thomas F. Malone  
Manager, Air Transportation Division