

AGING TRANSPORT SYSTEMS RULEMAKING ADVISORY COMMITTEE

**OFFICE OF THE CHAIRMAN
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January 21, 2005

Mr. Nicholas A. Sabatini
Associate Administrator
Regulation and Certification AVR-1
Federal Aviation Administration
Room 1000 West
800 Independence Ave. SW
Washington, DC 20591

Dear Mr. Sabatini:

At our January 2005 meeting, the Aging Transport Systems Rulemaking Advisory Committee (ATSRAC) completed its year long review of possible effects of wiring faults on MMEL systems. The cause of possible concern is that a system failure may be due to wiring faults rather than a defective component. Since the MMEL is not intended to provide troubleshooting or fault isolation guidance, it may be unknown if a wiring fault exists prior to dispatch under the MMEL. Also, it was learned that damaged wiring is not uniquely considered as a failure mode in MMEL evaluations. Therefore, after a lengthy detailed discussion, the Committee reached a majority vote of 11 - 5 to make the following recommendation to the FAA:

The FAA should consider guidance to developers of future MMELs to consider that damaged wiring may be the cause of system failures, and to consider (along with standard maintenance practices) if it is advisable to electrically isolate failed systems prior to dispatch under the MMEL. The intent is to preclude potentially damaged wiring associated with an inoperable system being able to produce damage to the aircraft.

Thank you for your consideration of this recommendation.

Sincerely,

Kent V. Hollinger
ATSRAC Chairman

Cc: James Ballough
Brenda Courtney

John Hickey
Charles Huber