

10th September 2020



To:
FAA Compliance & Airworthiness
Division,
Aircraft Certification Service



Ref: NPRM FAA-2020-0686.



Dear Director,

The Joint European Max Operators Group (JEMOG) is made up of current and future European operators of the 737 MAX. JEMOG was formed in September 2019 to provide European operators with a forum for a unified voice to communicate with EASA and Boeing on all matters relating to operations of the Boeing Max. This singular voice standardized and strengthened our questions and suggestions in relation to the 737 MAX Return to Service (RTS).

JEMOG would like to recognise the FAA, EASA and other regulators & agencies around the world for their complete and thorough review of the 737 MAX systems and procedures and we are confident that safety is the highest priority for the MAX RTS.

The JEMOG has reviewed the NPRM as published by the FAA and would like to make the following comments in relation to document FAA-2020-0686. These comments and recommendations are not intended to impact on the planned RTS programme of the FAA and other regulators rather should be considered as recommendations for consideration as part of the ongoing review of post RTS performance.

1. Although the document makes numerous references that the NNC has changed for the purpose of increasing the use of automation, we should exercise some caution with these changes. Due to the revised QRH checklist sequence for Airspeed Unreliable we recommend a caution statement should be added above the autopilot engagement instruction. The purpose of this statement will be to highlight to crew the risk of autopilot engagement while erroneous indications persist. The following caution might be considered to address this concern:

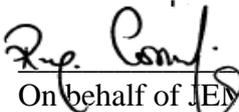
After autopilot engagement verify that aircraft flight path including pitch, roll and airspeed are responding as intended.

2. In relation to the additional NNC's, within the FAA document 2020-0686 there are several references to the "new" NNC's that have been added to the AFM. However, these NNC's already exist within the 737 QRH. The text in the FAA-2020-0686 should therefore use the term "updated" rather than "new" when referring to these checklists.

The JEMOG recognises the comprehensive work that has been undertaken by all parties to ensure a successful RTS of the 737 MAX and which will serve to enhance the industry's safety record in the years to come.

We appreciate you taking the time to consider our comments and we are available to discuss or clarify these proposed changes where necessary.

Yours sincerely,


On behalf of JEMOG