

JAA/FAA/TCCA
International MRB Policy Board
Issue Paper

Date: 16-July-04
IMRBPB #071

Title:	Identifying "Normal" Flight Crew Duties
Submitter:	Air Transport Association (ATA) of America
Issue:	ATA is seeking help from the IMRBPB regulatory authorities in determining and documenting an acceptable method of efficiently utilizing air carrier resources such that the MSG-3 analysts and, subsequently, an air carrier's maintenance program, can take "credit" for routine pre-flight tasks always performed by the flight crew prior to the origination of a flight (such as checking oxygen levels, full/free movement of flight controls, APU/powerplant fire tests, etc.) to uncover associated failures as "evident;" versus "hidden."
Problem:	<p>The tasks described above are generally not in the approved Aircraft Flight Manual's (AFM) "Limitations" section (the only AFM section that is "mandatory"). Additionally, under the philosophy of, "flight crews cannot do maintenance tasks," the FAA no longer allows a note in the MRB Report that flight crews could alternatively perform the task if included in an approved flight crew check list.</p> <p>While MSG-3's section 2-3-5., "Consequences of Failure (First Level)" has been recently rewritten to document and follow-up on any assumptions made during the MSG-3 analysis as to the AFM's eventual content, the current situation can result in an MRB Report that includes daily/pre-flight maintenance tasks that are duplicated by the air carrier's flight crew routine actions.</p>
Recommendation:	<p>FAA to exclude routine flight crew pre-flight system tests from their definition of a maintenance task.</p>

IMRBPB Position:	<p>FAA stated that flight crews would not be given credit for maintenance. Industry is faced with the problem that since the flight crew check list is not approved, the working group cannot take credit that those items contained in the checklist as being evident in the MSG-3 analysis.</p> <p>Position: Credit can only be taken for activities carried out by the operating crew at their normal place of duty. E.g. Onboard the aircraft</p> <p>Issue paper closed</p>
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Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority. (JAA, FAA or TCCA)