

International Maintenance Review Board Policy Board (IMRBPB)
Issue Paper (IP)

Initial Date: 26/04/2012

IP Number: 118

Revision / Date: Rev 1 / 08 Feb 12

Title: MRBR Approval Schedule

Submitter: Embraer and ANAC

Issue: Current MRBR process guidance material does not differentiate the approval schedule between first MRBR issuance and its revisions.

Problem:

Current regulatory authorities' guidance materials state that the delivery of the final MRBRP and any supporting documents to the MRB chairperson should be made at least 90 working/calendar days (depending on authority) before expected approval of the document. The industry agrees that 90 calendar days is feasible for the first MRBR issuance, however not applicable for subsequent MRBR revisions.

Having such a long delivery schedule for the MRBR may avoid having timely issuance of Instructions for Continued Airworthiness (ICAs) required by regulation (examples: FAA 14 CFR § 25.1529 Appendix H, EASA CS 25.1529 Appendix H, TCCA 525.1529 Appendix H).

A similar issue happens for MRBR Temporary Revisions as stated in guidance materials: *“Approval or disapproval of the proposed changes will be processed in the same manner as outlined for the MRBR approval/non approval process.”*

It is expected to have an expedited process to issue Temporary Revision, as the ISC would only require a Temporary Revision for urgent matters.

Recommendation (including Implementation):

MPIG requests the Policy Board that Regulatory Authorities revise their guidance materials to clarify that:

1. Delivery of the final MRBRP of the initial MRBR and any supporting documents to the MRB chairperson shall be made 90 working/calendar days before expected approval of the document.
2. It is expected that less than 90 working/calendar days is needed to evaluate the final MRBRP of a MRBR Revision and its supporting documents.
3. Expedited evaluation of a MRBR Temporary Revision is expected by the ISC.

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IMRBPB Position:

Date: April 26, 2012

Position:

FAA has confirmed that AC121-22C will be revised to indicate 90 calendar days from the current 90 working days for MRBR approval. Revisions shall be processed in the same manner as initial approval.

The IMRBPB has recognized the need to identify the MRBR TR process within the applicable MRB guidance documents. The MRBR TR approval timeline is to be negotiated with the appropriate MRB and ISC members and guidance on the MRBR TR process is to be included within the applicable regulatory guidance material.

Status of Issue Paper (when closed state the closure date): Closed April 26, 2012.

Recommendation for implementation:

Implement IMRBPB Position as IP118.

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority.