

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

Initial Date: 20/Feb/2015

IP Number: IP 154

Revision 0/ Date 23/Apr/2015

Title: MRB requirements specific to a signing authority

Submitter: Airbus

Applies To:	
Vol 1:	
Vol 2:	
Both:	

Issue: Inconsistent practices between TCHs and MRBs have led to misunderstanding and confusion concerning the content of sections or appendices that identify requirements specific to one signing Authority.

Operators, particularly those operating under a State of Registration that has not signed the MRB Report, question the background and need to add these requirements to their locally approved maintenance programs.

Problem: Some current MRB Reports include tasks that would not have been identified as applicable and effective to satisfy MSG-3 logic if the tasks had not also been known to be typical National Requirements (either from the Authority or the country of the host MRB). Similarly, tasks that are correctly derived from MSG-3 logic may have intervals quoted to reflect the national requirement of the host MRB.

The forced inclusion of National Requirements in the primary section of an MRB Report has resulted in some 'guest' MRB signing members requiring their National Requirements be included in the section (or appendix) of the MRB Report that is intended only to identify national differences in MRB requirements. While the objective is to help their carriers, this initiative has not been applied consistently and rarely, if ever, includes a full list of all NRs that these carriers must reflect in their programs.

Recommendation (including Implementation):

It is proposed that the harmonised MRB Process Standard shall include a paragraph to emphasise that task and interval requirements quoted in the MRB Report are identified from application of MSG-3 logic and shall not be unduly influenced by National Requirements coming from the Airworthiness Authority / Agency (e.g. FAA) or any other body within the country of the signing MRB member (e.g. DOT in the USA).

The MRB Process Standard shall also clarify the use of any section (or appendix) within an MRB Report that may be created to identify national differences in MRB requirements. Such sections should only be required when either agreement cannot be reached between MRB members on the outcome of the application of MSG-3 logic or there is a regulatory reason why the result must be managed in a different way by carriers operating under the registry of the signing MRB state (e.g. FAA requirements on handling Fuel Tank Safety and EWIS tasks).

It shall be noted that the section (or appendix) dedicated to specific national differences in MRB requirements may include MRB requirements from both

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the guest and host signing authorities. These shall be included in sub-parts to permit the Approval Letter to clearly identify their approval status. The intent is that the main body of the MRB Report is valid for all carriers irrespective of where they operate.

The MRB Process Standard should require that all MRB Reports include a clear statement that National Requirements are not included in the MRB Report. It should be noted that these may constitute additional tasks or may modify the scope or interval of MRB Report tasks. In the latter case, the responsibility for determination of which requirement takes priority is that of the National Authority.

IMRBPB Position:

Date: April 23, 2015

Position:

IMRBPB agrees that this recommendation will be included in the MRB Standard, Paragraph 10, and closed as IP 154.

Status of Issue Paper (when closed state the closure date): April 23, 2015

Recommendation for implementation: To be implemented in the IMRBPB MRB Process Standard.

After IMRBPB agreement, no new MRB Reports shall be approved that reflect National Requirements that are not identified from application of MSG-3 (unless specifically agreed with the ISC as per MSG-3 paragraph 1.1).

Retroactive: No

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