

JAA/FAA/TCA
International MRB Policy Board

IMRBP # 008
Originators JAA 96-002
Date 26/03/96

Title	.Flight Crew performing maintenance
Submitter	JAA MRB Working Group
Issue	Some MRB reports include the following statement: <i>"An operator may take credit for tasks described in this report, when accomplished in the flight deck by the flight crew as part of a local regulatory authority approved flight deck normal check list. Those tasks must be reviewed and approved by the local regulatory authority to assure accountability."</i>
Problem	it is not the purpose of the MRB report to take into account the possible local authorities requirements (FAR 43, JAR OPS & 145,) concerning "who may do what and where" but should be confined to the minimum maintenance required, as derived from the MSG-3 analysis. Another problem with making the statement in the MRB Report is that it will imply that this criterion may have been taken into account when compiling the report whereas in fact it cannot have been.
Recommendation.	The statement should either be withdrawn from the MRB reports or be placed in a separate appendix (as it addresses local regulation peculiarities), as provided e.g. by the JAA procedure Chapter 16, para 16.17: <u>Non JAA-NAA approval of the MRB Report</u> : <i>"There may be a need to identify national regulation differences that are not compatible, acceptable or applicable to all regulatory authorities. When this condition exists, an appendix to the MRB Report shall be used to list these differences, each being approved by the respective regulatory authority."</i>

IMRBPB Position.

The IMRBPB agrees that the above-mentioned statement be withdrawn from the MRB documents.
December 2001: The FAA has rescinded the policy statement issued on January 25, 1994 on that subject (see attached copy).

Important Note:

The IMRBPB positions are not policy. Positions become policy only when, the policy is issued formally by the appropriate National Authority (JAA, FAA or TCA)