Title: MSG-3 analysis of equipment such as ELTs, ULBs, FDR and CVR.

Submitter: Transport Canada

Issue: The aircraft manufacturer/vendor/WG tend to choose the local regulatory interval and maintenance required for those systems.

Problem: During MRB proceedings, there is a strong tendency to home in on the local regulatory interval and maintenance required for ELTs, ULBs, FDR and CVR and evaluate those systems on its own keeping in mind the purpose for those systems. The MRB report becomes an international document to provide a basis for any operator anywhere in the world to develop its aircraft maintenance program. Each system should be analysed on its own merit using MSG-3 analysis totally independent of any regulation. The question every WG members should have on their mind when going through the analysis is what can be done to a system to ensure that it will work when required of fill its purpose for being on board the aircraft.

Recommendation: A revision to MSG-3 may be required to provide adequate direction to members of Working Groups to ensure that each analysis stand on its own including the resulting task if there is one. The MRB should become a true international document which can be used anywhere in the world and would adequately contain the minimum maintenance requirements to keep the aircraft systems in an airworthy condition. To address a specific regulatory requirement, a note could be added to indicate that in some countries a regulation may exist for that specific system.

IMRBPB Position:

- The existence of a national requirements for above mentioned systems does not preclude the Working Groups from performing the MSG analysis.
- Existing national requirements may be however indicated with a note in the MRB document, or specified in a separate appendix.
- The IMRBPB encourages the Industry to revise the MSG-3 to clarify that point.

August 19, 2003

Issue paper closed – Final position as stated above. It is noted that ATA in their response of Sept 2002 stated they would introduce guidance on this issue in their proposed applications handbook.

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)