

JAA/FAA/TCA
International MRB Policy Board

date: 25/11/96
IMRBPB 017
JAA 96-009

Title: Retroactive application of AC 25 19 (CMR's)

Submitter: Airbus Industrie

Issue: FAA statement that future MRB revisions will not be approved if they do not comply with AC 25 19 para 12.

Problem: AC 25 19 was developed to provide guidelines for use on future aircraft projects. The ARAC WG did not discuss retroactive application.

It was previously understood that retroactive application would be a matter between the TC holder and the Primary Certification Authority.

We are not aware of any document that mandates retroactive application

Recommendation: Clarify that compliance with 25 19 (in whole or in part) is not enforceable by an MRB.

As an alternative, it is suggested that the IMRBPB might wish to issue a statement to MRB's to require that the CMR document is made Appendix 1 of the MRB Report (irrespective of whether or not it complies with 25 19).

IMRBPB position:

Certification Maintenance Requirements are a certification issue rather than an MRB issue and as such must be addressed by the appropriate national airworthiness authority's (NAA) aircraft certification regulatory authority. Appropriate guidance regarding CMR's is contained in FAA AC 25-19 and JAA AMJ 25.19.

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 TCA).