Title: Dual Analysis - Approach ETOPS/NON ETOPS

Submitter: H. Dieter Haring, Austro Control GmbH

Issue: Approach of achieving a MRBR for a type which is capable of flying ETOPS - and might be type certified therefore - but is definitely not required to fly ETOPS by most of upcoming operators.

Problem: Reg. Auth's approach is to make the statement, that a MRBR has to reflect to what the MFG has applied for in the Type art. This might not consider what the Operators - or most of them - are looking for - operationwise-. 

Recommendation: Let the ISC & MRB carry out Duel Analyses (during the process) if this is agreed in the beginning of the process using MSG bring out the MRBR, which should be addressed according the T.C. - Application; additionally there should be an Appendix which indicates the differences for the alternate way of operation, e.g. addition/exclusion of tasks and Route-changes.

IMRBPB position:

The MRB report should reflect what the aeroplane was Type Certificated for. The FAA responded to Boeing on the issue by letter Oct11/96 stating that a dual analysis was not necessary.

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).