Title: MRB Check Interval Escalations

Submitter: TCCA

Issue: Previously identified issues unresolved—see issue papers JAA 95-005, JAA 99-003 (copies attached). MRB evolution process needs more defined policy/standards/procedures.

Problem: We are continuously being confronted with requests to escalate MRB check intervals. The reason provided in most cases is “the competition” has higher intervals, and so marketing is the motivating factor. This puts a onerous demand on limited regulatory resources. Since the MRB establishes initial minimum maintenance tasks and intervals for any new operator. The maximum intervals can only truly be justified by the factors relating to that individual operators experience. This being said, an MRB document cannot influence a operator’s experience levels or the maximum intervals achievable by all operators. This responsibility is ultimately that of the operator and local regulatory agency. In essence by granting these extensions we are doing the work of the respective regulatory agencies and circumventing their authority.

Recommendation: IMRBPB must establish a maximum MRB check interval for specified group/category of aircraft pending the establishment of well defined MRB escalation process. One that we as the regulating authorities have confidence endorsing.

In addition establish a set of international limits for escalation programs.

- Minimum 5 year period between escalation/evolution programs.
- Maximum 20% increase on existing values for any evolution/extension program.

IMRBPB Position:

December 2001:

The JAA will develop a document addressing the issue in coordination with TCCA/FAA/CASA/Aruba by Oct/01. Draft document developed and comments required by 31 March 2002.

August 19, 2003

Position: This issue paper is to be carried forward and kept open until the evolution document is finalized, this activity would be one chapter within the PPH to be developed under IP 27. JAA will provide a copy of their current evolution document to TCCA, who will then merge it
with the current TCCA document, highlight the differences and pass to the NAAs for review, derivation of a common process and final acceptance/approval as a chapter of the PPH.

October 20th, 2005

FAA will organise a regulatory working group to establish a process for MRBR evolution for discussion with industry.

Status: open

21/FEB/2007

A specific regulatory WG launched and to initiate a proposal for end 2007. Draft will be then proposed to industry for discussion.

Status: Open

24/04/2008

Status: Closed

Closed through the development of the “evolution/optimization guideline document “ issue 1 dated 25/04/2008 available on EASA web site.

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