

JAA/FAA/TCCA
International MRB Policy Board
Issue Paper

Date: 16-July-04
IMRBPB # 069

Title:	Incorporation of MRB Report Revisions by Existing Type Design Operators
Submitter:	Air Transport Association (ATA) of America
Issue:	ATA is seeking help from the IMRBPB regulatory authorities by their establishment of a consistent policy on the ability of an air carrier to directly incorporate MRB Report revisions into their own maintenance programs without any undue additional justification.
Problem:	Some ATA member air carriers are reporting that their local regulatory authorities are requiring them to perform a full analysis and justification of MRB Report revisions before they are allowed to incorporate those revisions into their existing maintenance programs; even though it was the data from these same air carriers that was utilized by the OEM/ISC/MRB to produce the MRB Report interval revision (this "requirement" is most common when dealing with interval <u>escalations</u> , but in some cases it is applied to <u>any</u> MRB Report change). While the inconsistency of this sort of FAA action should be eliminated, the biggest problem with this practice is that new operators of the same type design, <u>with NO in-service operating experience</u> on that type design are allowed to immediately incorporate that same, revised (escalated) interval into their new maintenance program from the most current MRB Report.
Recommendation:	<p>By policy of the regulatory authorities, <u>air carriers that actively participate</u> with the OEM/ISC/MRB revision to an MRB Report should be allowed to subsequently incorporate those revisions into their own maintenance programs without the "requirement" to further justify the changes to their maintenance program. Air carriers that currently operate the same type design for which an MRB Report is revised, <u>but did not actively participate</u> in developing the revision, should be allowed to incorporate those revisions with minimal in-house analysis ... analysis that simply validates that air carrier's operational and utilization similarities with those used in the MRB Report as "normal."</p>

IMRBPB Position:

This is a NAA maintenance program approval issue and not an IMRBPB issue. Issue paper closed.

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)