Title: Approval of Dual MRBRs for the Same Aircraft Model

Submitter: TCCA

Issue: TCCA has been approached to consider approving two separate MRBRs for the same aircraft model. The MRBRs would be derived from different versions of MSG logic (MSG-2 and MSG-3). The underlying Rationale for this request appears to stem from the Design Approval Holder’s (DAH) need to recover the additional costs of developing the MRBR for Legacy Aircraft.

Problem:

a) Pursuant to TP 13850, AC 121-22A and JAA Administration and Guidance Material, Maintenance Procedure Chapter 16, do we continue to invite other regulatory authorities to participate in the development of this additional MRBR?

b) TCCA is not familiar with the process of DAH’s marketing (selling) new MRBRs on a serial number by serial number basis and would like to know if there is or if there are issues within the regulatory authorities or between the regulatory authorities concerning this practice.

c) Where a dual MRBR is approved, TCCA finds itself unfamiliar with the process that the regulatory would use to manage the revision and control of each MRBR. TCCA is advised that at least one Design Approval Holder is marketing dual MRBRs. Of concern is how we as regulatory authorities should deal with the different maintenance programs during an annual review which would present logics that are not compatible (MSG-2 vs MSG-3)?

Recommendation:

a) That the IMRBPB arrive at a consensus on how to handle these MRBRs

b) That the regulatory authorities provide information on whether or not this is an issue to them, and

c) That the regulatory authority’s who have issued dual MRBRs provide a briefing on how they are managing and controlling the two different MRBRs

IMRBPB Position:

October 20th, 2005

Regulators need further discussion to come to a final position.

Status: Open

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20/FEB/2007

To be continued and regulators to meet and issue recommendation prior to the next IMRBPB meeting
Status: closed

Proposal for IMRBPB March 09

The IMRBPB no longer supports dual MRBR for the same model aircraft. That is to say, that the IMRBPB no longer recognizes minimum maintenance requirements derived by a means other than an MSG-3 process and recommends no longer approving non-MSG-3 derived minimum maintenance requirements in the context of dual MRBR’s.

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