

International Maintenance Review Board Policy Board (IMRBPB)
Issue Paper (IP)

Date: Feb 07
IP Number: 91
Revision / Date:

Title: EAPAS requirements to approve EZAP

Submitter: Transport Canada (Cliff Neudorf)

Issue: **The new EAPAS rule amends Appendix H to Part 25 of the US CFR 14. As such the amended rule will require approval of EZAP as a part of the ICA for a Design Approval applicant's Instructions for Continued Airworthiness. Transport Canada has interpreted this approval to be the approval issued to the MRBR as the EZAP is included within the MRBR.**

Problem: Some regulatory authorities are taking a position that this approval is not the approval accorded to the MRBR and that their Aircraft Certification personnel must issue a separate approval as part of the type certificate process. This approach could present significant problems with respect to the current coordinated approval of MRBRs that exists between the IMRBPB signatories. Issues will likely develop around potential delays in the process of approval if there is a significant disagreement between the Aircraft Certification body and the other regulatory authorities that are approving the document. In addition duplicity in programs will be presented for the operator to choose from when developing and presenting their maintenance schedule for approval at the local authority level. Which document do they use as the definite source for developing their maintenance program? In addition, which document will be relied on for continuing airworthiness information if two versions are published? These amongst other questions need to be addressed and guidance put forward by the IMRBPB to avoid a forthcoming embarrassment when it comes time to implement the new EAPAS rule.

Recommendation (including Implementation):

That the regulatory authorities agree that the current system for approving EZAP as part of the MRBR continues to be respected and that the EZAP approval required by the new EAPAS rule within the design standard be identified and accepted as being the MRBR approval issued by the MRB Chairman.

IMRBPB Position:

Date: 20/FEB/2007

Position: IMRBPB strongly feels this is an inappropriate use of the MSG 3 tool to address certification issue; therefore, the IMRBPB endorsed the above recommendation.

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Status of Issue Paper (when closed state the closure date):

22/FEB/2007: Closed

Recommendation Implementation:

Not applicable

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