

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

Initial Date 20/Feb/2015:

IP Number: IP 150

Revision 0 / Date 22/Apr/2015:

Title: Consideration of Non MSG-3 Tasks in the MRBR

Submitter: Bombardier

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|-------------|---|
| Applies To: | |
| Vol 1: | |
| Vol 2: | |
| Both: | X |

Issue:

Lately, at WG and ISC meetings, a regulatory authority insisted on following certain local regulations when developing MSG-3 analyses. The similar issue has been experienced by the most major aircraft manufacturers.

Problem:

The expectation of the regulatory authority was that MSG-3 analyses had to comply with certain local regulations.

Bombardier tried to explain that:

- MSG-3 analysis is a logic exercise which follows the rules as defined in A4A MSG-3 document. The resulting tasks are listed in the MRB Report as initial minimum requirements.
- The MRB Report requirements are complemented with applicable certification requirements (AWLs, CMRs, etc.).
- The operator is expected to generate their own maintenance program based on requirements of MRB Report and certification requirements and to comply with all applicable local regulatory requirements. The operator's maintenance program has to be approved by the local regulatory authority.

As we all know, the operator will have to comply with all applicable local regulatory requirements, but not necessarily by MSG-3 derived tasks.

All of this is well established practice and for many years the MSG-3 analysis process was not questioned, but now the efficiency of our meetings is affected as a result of the certain regulatory authority expectation that MSG-3 analyses have to comply with the local regulations.

Of course, we are aware of operator's angle and their obvious interest that after introducing all MRB tasks in their maintenance program they do not have to introduce too many tasks over and above to comply with applicable local regulatory requirements. That is why we always review local regulatory requirements (up to a reasonable extent) and assess if the MSG-3 task intent complies with the regulation. Ideally, it does, but not necessarily.

MSG-3 requirements and regulatory requirements are the results of different processes and in many cases are not identical. The most obvious case is when there is a regulatory requirement for the aircraft system, while MSG-3 analysis didn't derive a task in the related MSI.

Example: ATC Transponder system has a regulatory requirement to be tested every 24-calendar months in most of the local regulations.

At the same time, we don't know of any MRB program with MSG-3 task in the ATC Transponder MSI.

In the first sentence, IP037 supports this position.

IP037 "Regulatory Rules in the MRB Report" states that:

"The MRB Report should only contain tasks arising from the MRB process. National differences for MSG-3 derived tasks should be identified. FAA AC 121-22 already contains appropriate guidance".

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The appropriate guidance in AC 121-22C would be in paragraph 5-2. NATIONAL AVIATION AUTHORITY (NAA) APPROVAL OF THE MRBR states:

“There may be a need to identify national regulatory differences that are not compatible with, acceptable to, or applicable to all regulatory authorities. In this case, use an appendix to or specified section of the MRBR to list these differences, with the respective regulatory authority approving each difference. If the FAA is the validating authority for a foreign MRB, then a separate appendix to or specified section of the MRBR will identify regulatory differences.”

While we absolutely understand and support the position that “*The MRB Report should only contain tasks arising from the MRB process*”, the question, which refers to the rest of IP037, is how the specific MRBR section to identify the national regulatory differences belongs to the MRB Report. The current practice shows that sometimes regulatory authorities may interpret this in a way described at the beginning of the problem statement. When this happens, it only contributes to the confusion and emphasizes a need for a further clarification.

Recommendation (including Implementation):

The recommendation is to have the statement based on the first sentence from IP037 introduced at the beginning of the MSG-3 document, in order to avoid any future confusion.

1-1. Objective

It is the objective of this document to present a means for developing the scheduled maintenance tasks and intervals which will be acceptable to the regulatory authorities, the operators, and the manufacturers. The scheduled maintenance task and interval details will be developed by coordination with specialists from the operators, manufacturers, and the Regulatory Authority of the country of manufacture. Specifically, this document outlines the general organization and decision processes for determining scheduled maintenance requirements initially projected for the life of the aircraft and/or powerplant.

Historically, the initial scheduled maintenance tasks and intervals have been specified in **Maintenance Review Board (MRB)** Reports. MSG-3 is intended to facilitate the development of initial scheduled maintenance. The remaining maintenance, that is, non-scheduled or non-routine maintenance, consists of maintenance actions to correct discrepancies noted during scheduled maintenance tasks, other non-scheduled maintenance, normal operation, or data analysis.

This document addresses the development of scheduled maintenance using the MSG-3 analysis procedure. The MRB Report should only contain tasks arising from the MSG-3 logic process. National requirements not derived from MSG-3 logic are not part of the MRB Report. Other non MSG-3 tasks may be submitted to the Industry Steering Committee for consideration for inclusion in the MRB Report only when justification can be provided.

We think that a statement like this at the beginning of the MSG-3 document would help to clarify the issue. This statement directly talks about the content of MRB Report and should be in MSG-3 document, not only in IP037.

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IMRBPB Position:

Date: 22/04/2015

Position:

IMRBPB and MPIG have agreed to the current wording as highlighted in the IP. Closed as IP 150.

Status of Issue Paper (when closed state the closure date): 22/04/2015

Recommendation for implementation: Implement highlight text into the next revision to MSG-3.

Retroactive: No

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