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

Initial Date: 28/Apr/2017 IP Number: IP174 Revision / Date: R0 / 28/Apr/2017

Title: IP Management Procedure Changes		Applies To:	
Submitter:	FAA	MSG-3 Vol 1 MSG-3 Vol 2	
		IMPS	Х

- **Issue:** It is becoming increasingly difficult to determine what IP's contain information that is still "active".
- **Problem:** With the long history and recent activity of this board, there are now 161 closed Issue Papers on record. While the information in all of them is useful to understand why issues have arisen and been resolved, most at this point have been incorporated into some other document mostly into MSG-3, some now into IMPS.

It has become increasingly difficult for people (on the program level) to determine if the text of a closed IP is appropriate to follow (or if that text has been incorporated into something else). Note that 'closed' in this context was historically used to indicate that the IP was 'issued'. Additionally, since those incorporated documents (both MSG-3 and IMPS) may later be changed again, the requirements in a given IP may no longer match the requirements listed in MSG-3 or IMPS, and this could lead to confusion, with one party relying on the text of an IP, while another relies on the text in the newer/current revision of MSG-3 or IMPS.

Additionally, there are issues with the establishment and control of IP revisions. For example, IP83 and IP 127 are on the same subject, and the recommendation section of IP 127 states that it will "supersede IP 83" (both are shown as being at revision level 0) However, in a similar situation, IP44 has had related material revised several times, but there is no coherent historical guide as to what those changes were and which documents were affected.

Also, the IP management procedures does not cover a situation where an IP may have errors found after the IMRBPB meeting, but publication of a document (MSG-3) is affected, and this is seen by the Board as a concern.

Finally, there is not currently an "IMPS" block on the IP template form, and this should be added.

Recommendation (including Implementation):

1) That a formal revision process for issue papers be established and be uniformly used to control and document changes to IP's over time.

2) That the IMRBPB review all closed IP's and determine their status of incorporation into MSG-3 or IMPS. The Board should then add information

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reflecting the current incorporation status of those papers using the process in (3) below.

3) That the following three statuses for IP's be established and used:

- "Active" used to refer to an IP that has been agreed to by the IMRBPB and may be used in MRB/MTB programs,
- "Incorporated" used to refer to an IP that has been used to amend the MSG-3 and/or the IMPS document, and is therefore no longer in current effect, or
- "Archived" used to refer to an IP that is, for any other reason than incorporation, now only valuable for reference.

4) That the Board further revise the IP Management Procedure (currently at Revision 5 dated 30 April 2014) document to add the following four paragraphs:

9b.The "Status of Issue Paper" where the current status of the IP should be stated. The three possible statuses of an IP are:

- i. "Active" used to refer to an IP that has been agreed to by the IMRBPB and may be used in MRB/MTB programs,
- ii. "Incorporated" used to refer to an IP that has been used to amend the MSG-3 and/or the IMPS document, and is therefore no longer in current effect, or
- iii. "Archived" used to refer to an IP that is, for any other reason than incorporation, now only valuable for reference.

14. The IMRBPB management is responsible for monitoring the publication of new versions of the MSG-3 documents and IMPS. When they are published, the management should review them to determine that the changes stated in recent active IPs were reflected.

15. Once those changes are in place, the IMRBPB management should then add an additional statement to the "Status" section of each IP to reflect where and when the information was incorporated. Finally, the status of the IP should be changed from "Active" to "Incorporated" in the IP Index.

16. If the IP is not incorporated into a document and never will be (for example, see IP 7) then, with agreement of the Board, the status should be changed to "Archived" once the subject has been resolved.

17. Once an IP is listed as "Incorporated", all parties should refer to the revised document rather than the IP text (as the document may reflect subsequent changes.) If an IP is listed as "Archived", parties should not use the IP text in further MRB processes.

5) That the Board further revise the IP Management Procedure to incorporate a post-meeting IP revision policy.

6) That the board revise the IP Template (currently at Revision 4 dated 30/Apr/2014) to add a box for those issues that affect IMPS to the current box in the upper right corner (as demonstrated here.)

7) That the IMRBPB Issue Paper Website be updated to make it obvious which IP's still have "active" content and which have been incorporated into

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other documents and therefore are only being retained for historical content and context.

8) That the IMPS be amended to add an "IP incorporation policy" that allows for IP's to be used (via IMPS) immediately once the IP is agreed to and the status is "Active". The recommended change to IMPS is as follows (new paragraphs in Section 3).

3.10 IP Incorporation Policy.

- **3.11** When IMRBPB Issue Papers are agreed to and classified as "Active" in the IP (and IP Index), they then may be (but are not required to be) incorporated into an MRB/MTB program. They should be agreed to by all parties via a revision to the PPH prior to such use.
- **3.12** Once an IP is incorporated into a PPH, and the IP is then later listed as "Incorporated" by the IMRBPB, the IP content can continue to be used, unless the program implements a change to incorporate the new version of the document that the IP affected (in which case, the new document would supersede the IP.)
- **3.13** If an IP is listed as "Archived" by the IMRBPB, the MRB/MTB program should remove the IP content from the PPH via the next revision. It is not expected that existing analysis based on these IPs be reopened.

IMRBPB Position:

Date: 28/Apr/2017 **Position:** IMRBPB agrees to CIP FAA-2017-02 with the changes implemented at the IMRBPB Meeting 2017, which becomes IP174

Date:

Position:

Status of Issue Paper and date: Active 28/Apr/2017

Recommendation for implementation:

IP174 will be included into the next revision of the IMPS document

Retroactive: YES

Important Note: The IMRBPB IPs are not policy. An IP only becomes policy when the IP is adopted into the processes of the appropriate National Aviation Authority. However, before formal adoption, the IP content may be incorporated by the MRB applicant on a voluntary basis with the agreement of all parties as detailed in the program PPH.

IP Template Rev 5, dated 28/04/2017