

Subject: CIP-IND-2010-8 use of TSO for task interval determination.

During the MPIG meeting in Montreal Nov 8-10 2011, the Federal Aviation Administration (FAA) Aircraft Evaluation Group (AEG) stated that they had contacted the Washington office to obtain guidance on this subject. In order to make sure that the industry position is clearly stated and that the answer from Flight Standards Service (AFS) is adequately addressing the issue, the MPIG position is as follows:

1. Advisory Circular (AC) No: 21-50 Installation of TSOA Articles and LODA Appliances, dated 02/28/2011, describes the appropriate use of data approved by the FAA, through the technical standard order authorization (TSOA) or TSO letter of design approval (LODA), by applicants seeking type certificate or approval of a change to type design under provisions of Title 14 of the Code of Federal Regulations (14 CFR) part 21. Paragraph 6 - Responsibilities for Instructions for Continued Airworthiness (ICA), of this AC describes an acceptable means for providing instructions for continued airworthiness. AC21-50 states "The applicant may use the maintenance instructions provided under the TSOA in developing the ICA; or, may choose to develop an ICA independent of, or partially using, the TSOA maintenance instructions." The IMRBPB believes and FAA AEG agrees that this indicates using Maintenance Steering Group-3 (MSG-3) to develop ICAs of TSO parts is acceptable.

2. The MSG-3 method does not "ignore" TSO recommendations in the task interval determination process. The CIP does not intend or suggest that in any way. It is clear in the MSG-3 method that full consideration is given to the TSO contents. TSO parts and ICA data are documented as part of the MSG-3 process during working group meetings. The chapter 2-3-8 Systems/Powerplant Task Interval Determination, details the sources of information to be used in the interval determination. As such the TSO is one of these sources ("manufacturer's data and/or vendor recommendations"). The IMRBPB believes and FAA AEG agrees that MSG-3 reflects that full consideration of the TSO data related to ICA's are considered during the MSG-3 process and further supports its use to develop the ICA's of TSO parts.

3. The TSO maintenance tasks are derived from a component validation process that is disconnected from the actual application on a given airframe. This is why the MSG-3 process when considering the whole aircraft system may lead to effective tasks and intervals that differ from those given as part of the TSO data package. As stated in the MSG-3 Chapter 2-3-2 Analysis procedure, "All available Vendor Recommendations (VR) should be fully considered, discussed in the Maintenance Working Group (MWG) meetings, and accepted only if they are applicable and effective according to MSG-3 criteria." The TSO task recommendations based on a single component analysed by a vendor with limited knowledge of the whole aircraft system is applicable to any airframe. The TSO recommendation should not over-rule the tasks and intervals determined by the industry/regulatory MWG meetings based upon the whole aircraft system analysis and a 30 year old seasoned MSG-3 process. AC No: 21-50 states "The data developed by a TSOA holder is required to address the minimum performance standards (MPS) defined by the TSO, and might not address all of the applicable airworthiness requirements for its installation in the type design of a product. Therefore, the TSO marking on a TSO article does not indicate that the applicable airworthiness requirements of the product on which it is being installed have been addressed." The MSG-3 process does address the applicable airworthiness requirements for the installation as well as considering the TSO data related to ICA's (vendor recommendations) which supports the use of MSG-3 to develop the ICA's of TSO parts.