

International Maintenance Review Board Policy Board (IMRBPB)

Issue Paper (IP)

Initial Date (DD/MMM/YYYY):

IP Number:

Revision / Date (DD/MMM/YYYY):

Title: Candidate CMR's (CCMR) dispositioned using MSG/MRBR Tasks

Submitter: FAA

Applies To:	
MSG-3 Vol 1	X
MSG-3 Vol 2	X
IMPS	X

Issue:

CCMR's dispositioned using MSG3/MRBR tasks IAW AC25-19A with the expectation a limitation be maintained within an uncontrolled MRBR document. OEMs are using different methods to identify and control the CCMR task, which increases the complexity of maintenance planning, maintaining an operators program, and the possibility of exceeding the maximum safe interval.

Problem:

OEMs are using MSG3/MRBR tasks to disposition CCMR's that have an associated system safety assessment (SSA) maximum interval limitation that must be maintained. OEMs have developed varying methods of identifying these tasks such as listing the MRBR task in an appendix with or without the actual maximum SSA value listed. This method requires that operators refer to the appendix, or other method, prior to any operator program/MRBR task escalation. Further, if the SSA interval is not published, the operator must contact the OEM for permission to escalate these tasks. Operators calling an OEM for permission to escalate a task is unprecedented and not a part of any currently authorized process. This CCMR process adds an undue layer of complexity to the operators' maintenance programs with current active MRBR's containing anywhere from 17 to 44 controlled CCMR tasks. Operators with mixed fleets may have different requirements for each program, and at least one current MRBR includes controlled CCMR tasks that are not FEC 5 or 8, further complicating the process. This system of balancing CCMR's within the MRBR and operators programs has no value added for operators. Many MRBR tasks have an initial interval derived from the MSG-3 logic that is very close to the SSA interval thus precluding any useful escalation within the maintenance program. The risk of inadvertently exceeding the original SSA value outweighs any benefit derived from having a MRBR task in lieu of an actual limitation. CCMR and MSG3 MRBR tasks and intervals are derived from two fundamentally different philosophies and analysis. It is important to take that into consideration during a CMCC process when trying to disposition a CCMR using an MSG3/MRBR task.

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Recommendation (including Implementation):

If CCMR's are dispositioned using MSG3/MRBR tasks, MSG 3 should drive the task and escalations for the life of the aircraft from that point forward. If a task is in fact required to detect safety-significant latent failures that would, in combination with one or more other specific failures or events, result in a hazardous or catastrophic failure condition as per the certification requirement, the task should become a CMR listed in the airworthiness limitations section.

The following amendments are recommended:

In IMPS:

Task and interval requirements quoted in the MRB Report are identified from application of MSG-3 logic and shall not be subject to any control restrictions other than the MSG-3 process.

In MSG-3:

2-3-8.6 Flowchart Procedure step 6 and 9 should add the following language:
MSG 3 will drive the task and escalations for the life of the aircraft from that point forward.

IMRBPB Position:

Date:

Position:

Date:

Position:

Status of Issue Paper and date:

Active

Incorporated in MSG-3 / IMPS (with details)

Archived

Recommendation for implementation:

Retroactive: Y/ N

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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.