

Halifax TCCA 19-21 August 2003

Present:

B Hawes TCCA
 T Newcombe FAA
 B Basse FAA
 C Neudorf TCCA
 D Pattie CASA
 D Marchant CAA UK
 K C Mann HK CAD
 J Meirelles CTA
 R Pennanen TCCA
 T Llewellyn JAA

Apologies:

A Fergusen CAANZ
 C Damers MOT Aruba
 T Jauernig LBA

The attached agenda formed the basis for the discussions of the meeting Attachment A.

Action	Item	IP Status
	1. Welcome Dick Laird, Chief Operations, TCCA welcomed the IMRBPB to the Halifax area.	
	2. Opening Comments and Introductions of new participants The meeting welcomed new members with associated introduction of all.	
	3. SFAR 88 & Advisory Circular, B Prudente, D. Kammers Brian Prudente and Dennis Kammers provided an overview of the current status of the SFAR 88 activity including a presentation pertaining to the draft AC 120-XX which details the implementation process for SFAR88. Attachment A provides copies of the draft AC and Attachment B the powerpoint presentation.	
	4. Review minutes from September 2002 Seattle meeting. The minutes of the previous IMRBPB meeting (September 2002) were accepted. There was discussion concerning changing the format of the meetings with the following decision being taken: a. Decision: That the IMRBPB would set aside time immediately prior to the IMRBPB meeting in order to conduct a joint IMRBPB and Industry meeting. The length of this meeting would be	

		determined based on the number of identified issues. The IMRBPB would host, chair and solicit agenda items for that meeting. The IMRBPB would then conduct its normal meeting for the following two days. There was concern that representation be limited in total numbers to ensure an effective overall working environment.	
Action TCCA		<p>With reference to Item 9 of the 2002 minutes there was discussion concerning the evolution process for MRBRs. The following decision was taken:</p> <p>b. Decision: That TCCA will re-circulate the evolution document for comments. Timescales to comment are 1st week of November with 60 days thereafter to amalgamate comments and retransmit for final acceptance by email. This decision is also tied to Issue Paper # 44 “MRB Check Intervals”.</p>	
Open Action All NAAs		Reference Item 6 of the 2002 minutes, Emergency Escape Provisions, JAA TGL, this item is still open and all NAAs are requested to comment on the document. The FAA has published a handbook bulletin (HBAW 02-04C) on the subject, which is available on the web.	
		Note: With reference to Item 4 of the 2002 minutes, all past open IPs are part of the agenda for the current meeting (2003).	
	5.	Review all open issue papers All open Issue Papers were reviewed as follows;	
Action FAA	IP 51	<p><u>MSG 3 Revisions Authority Acceptance</u></p> <p>Discussion centred on clarifying the process that the regulatory authorities will follow to ensure that a harmonized acceptance of future revisions to MSG 3 will be achieved. The following procedure was agreed to.</p> <p>Decision: To expedite the acceptance process ATA will be requested to submit requests for acceptance directly to the IMRBPB Members. Each IMRBPB member would in turn forward formal acceptance of the document to the FAA for a coordinated joint acceptance.</p> <p>There was discussion that the joint acceptance could be via a common cover letter to the MSG document or by separate acceptance letters. There was also discussion that acceptance could be done by email and posted to JAA web site</p> <p>Action: B Basse to check on the acceptability to the FAA that all IMRBPB Members could signify acceptance of the document on the same page.</p> <p>Decision: With reference to MSG 3 at Rev. 2002, and Rev. 2003 –</p>	Closed

<p>Action ATA</p> <p>Action All NAAs</p>		<p>IMRBPB members would review and accept these revisions when the ATA requests the IMRBPB to do so. ATA to request acceptance of these revisions.</p> <p><i>(Note: ATA requested Aug 23/03 that the IMRBPB members accept MSG-3 Rev 2003, TCCA will accept 2002 as part of the 2003 document.)</i></p> <p><i>(Note: In the Joint meeting the above discussion was modified as reflected in the accompanying minutes for that meeting.)</i></p> <p>Action: There was also discussion that the IMRBPB needs to develop a dispute settlement process where disagreements may develop concerning the acceptability of a particular amendment request.</p>	
<p>Open FAA JAA/ EASA</p> <p>Action FAA</p>	<p>IP 54</p>	<p><u>Implementation of IMRBPB Positions</u></p> <p>JAA stated that their handbook already addresses many of the processes being implemented and that it is being amended as required to reflect new decisions taken at the IMRBPB.</p> <p>The FAA stated that they are issuing policy letters and memos to advise and implement the decisions taken by the IMRBPB. This will then be published on the AFS 300 website.</p> <p>TCCA stated they are using TP 13850 to implement IMRBPB decisions. TCCA also stated they are using Staff Instructions and Airworthiness Notices to assist in implementing policy and informing Industry.</p> <p>TCCA raised the possibility for having a higher level of signature on the Charter to gain more acceptability for the document. JAA will wait till the EASA process of approval is ironed out. Remains open pending further review within the FAA and JAA/EASA inventory of open issues.</p> <p>Action: B. Basse to raise the merits of this proposal with higher management in the FAA.</p>	<p>Open</p>
		<p>Note: The remaining open issue papers were dealt with as follows; see <u>Attachment C</u> to these minutes, which reflect the ATA response to the open Issue Papers.</p>	
	<p>IP 01</p>	<p><u>The use of previously approved analysis for simple MSI's</u></p> <p>-The IMRBPB position is as stated on the IP.</p>	<p>Closed</p>
	<p>IP 05</p>	<p><u>MRB task escalation</u></p> <p>-The IMRBPB position is as stated on the IP.</p>	<p>Closed</p>
	<p>IP 07</p>	<p><u>Revision of MSG – 3</u></p> <p>-The IMRBPB position is as stated on the IP. Discussion at the meeting</p>	<p>Closed</p>

		re-iterated concerns stated in the 2002 minutes that the revision cycle for MSG 3 needs to be extended (2 or 3 year amendment intervals are suggested)	
	IP 10	<u>Check Interval Policy</u> While already closed, the IP was reopened and amended to include the following “While the choice for packaging is left to the manufacturer, the manufacturer shall follow guidelines as stated in MSG-3 at Section 2-3-7 in revision 2001 or later”	Closed
	IP 15	<u>MSG –3 Analysis of equipment such as ELTs, ULBs, FDR and CVR</u> -The IMRBPB position is as stated on the IP. It is noted that ATA in their response of Sept 2002 stated they would introduce guidance on this issue in their proposed applications handbook.	Closed
	IP 20	<u>MRB Revision Procedures</u> -The IMRBPB position is as stated on the IP.	Closed
	IP 21	<u>HIRF Maintenance</u> -The IMRBPB position is as stated on the IP. It is noted that ATA have amended MSG-3 to include analysis for HIRF and Lightening.	Closed
	IP 22	<u>HIRF/Lightening Protection Maintenance Programs</u> -The IMRBPB position is “The IMRBPB can only recommend policy applicable for retroactive MRB report revisions.”	Closed
Action All NAAs	IP 27	<u>FAA Project to develop a generic Policy and Procedures Handbook (PPH) for utilizing MSG-3 during the Maintenance Review Board (MRB) process.</u> -To be carried forward, with reference to the Sept 2002 meeting agreement was reached to convene a special meeting to draft this document. Decision: As a special meeting is not financially practical the process has been amended to developing the document on a chapter-by-chapter basis utilizing email and other such processes. Action: JAA will forward their draft handbook to TCCA, who will then circulate for comment and acceptance by all IMRBPB members	Open
	IP 28	<u>Guidelines for JAA/FAA/TCA participation in MRB’s.</u> -Position amended to include; “The guidelines for TCCA involvement in the MRB process are contained within TP 13850, Scheduled Maintenance Instruction Development Processes.”	Closed
	IP 29	<u>Standard RCM logic analysis.</u>	Closed

		ATA's response was reviewed, as was the IMRBPB Charter. As a result the IMRBPB is of the view that this is an ongoing activity fundamental to the IMRBPB's goals and has taken the following position. Position amended to include; "The IMRBPB is established as a body for the continuing development of policies, procedures, and guidance for the use of personnel operating under the purview of various Maintenance Review Boards (MRB's). In addition to promoting harmonization with other regulatory authorities, the IMRBPB would advocate the standardization of MRB policy and procedures."	
	IP 30	<u>MSG-3 Analysis of emergency/backup equipment.</u> Position: IP 47 MSG-3 Analysis of Emergency Equipment supersedes this IP	Closed
	IP 31	<u>Applicability of the MRB Process.</u> Position: Is as stated on the IP, but amended to include "The IMRBPB recommends that the NAA's review on a case by case basis the application of the MRB process to this class of aircraft."	Closed
	IP 32	<u>Applicability of the MRB Process.</u> Position: Is as stated on the IP, but amended to include "The IMRBPB recommends that the NAA's review on a case by case basis the application of the MRB process to this class of aircraft."	Closed
	IP 33	<u>Choice of Interval Parameters.</u> Position: The existing position is deleted and the following is to be inserted "While the choice for packaging is left to the manufacturer, the manufacturer shall follow guidelines as stated in MSG-3 at Section 2-3-7 in revision 2001 or later"	Closed
	IP 34	<u>Application of MSG-3 (Rev.2) for Emergency Equipment-versus normal usage of the same equipment (e.g. : Doors, Brakes) .</u> Position: IP 47 MSG-3 Analysis of Emergency Equipment supersedes this IP	Closed
	IP 36	<u>Guidelines for Maintenance Programme Evolution stipulated in the MRBR.</u> Position: IP 44 MRB Check Interval Escalations supersedes this IP	Closed
	IP 41	<u>Aircraft Certification Continued Airworthiness Co-ordination.</u> Marked as withdrawn, JAA will address this internally.	Withdrawn
	IP 43	<u>MSG Analysis Procedure.</u>	Withdrawn

		Withdrawn by JAA.	
Decision Action All NAAs	IP 44	<u>MRB Check Interval Escalations.</u> Decision: Position: to be carried forward and kept open until the evolution document is finalized, this activity would be one chapter within the PPH to be developed under IP 27 JAA will provide a copy of their current evolution document to TCCA, who will then merge it with the current TCCA document, highlight the differences and pass to the NAAs for review, derivation of a common process and final acceptance/approval as a chapter of the PPH.	Open
Action All NAA's	IP 47	<u>MSG-3 Analysis of emergency/backup equipment.</u> Position: is as stated in the IP. Discussion centred on the policy that each IMRBPB member has implemented to address this position. It was decided to amend the position to include: "That each member NAA will publish their policy on this and circulate to other NAA's (include in the minutes)." Note: It is intended that the above approach be utilized for all policy promulgated within each NAA member jurisdiction, which is meant to address positions taken by the IMRBPB.	Closed
	IP 48	<u>The recognition of evident failure</u> Position: is as stated on the IP,	Closed
	IP 49	<u>Standard of RCM Logic</u> Position: As stated on the IP.	Closed
Action JAA	IP 52	<u>Issue Paper Status/control</u> Position: Is as stated on the IP but amended to post all issue papers on the website. JAA will ensure that all IPs are posted.	Closed
Action All NAAs	IP 56	<u>IMRBPB Extended Membership</u> Position: SMEs may be brought into IMRBPB meetings to deal with specific issues, there will be no extended membership offered to non-regulatory bodies. Note: Charter will be amended to permit a new format for the meetings to help ensure a sufficient interface with industry.	Closed
	8.	New Issue Papers	
	IP 57	<u>Task and Interval Incorporation within an MRB Report when developed</u>	Closed

		<i>from a process other than the accepted MRB analytical logic.</i>	
Action All NAAs		<p>Position: With reference to Section 1-1, third paragraph of MSG-3, additional requirements developed using different ground rules and procedures from MSG-3 must be submitted with selection criteria to the Industry Steering Committee for consideration and inclusion in the MRB Report recommendation. Notwithstanding this section, the IMRBPB supports the concept that MSG-3 should be sufficient to develop the initial scheduled maintenance program. Any need for adjustment of an existing MRBR should be conducted using the latest version of MSG-3 taking into consideration the recommendations as stated above.</p> <p>Note: While the issue is closed it was recognized there is a need to have further discussion on this matter.</p>	
	IP 58	<p><u>Maintenance Source Data</u></p> <p>Position: “It is the aircraft manufacturer’s responsibility to produce ICAs for on-wing maintenance. Therefore ICAs based on an MRBR take precedence.”</p>	Closed
Action All NAAs	IP 59	<p><u>Hidden functions of systems during emergency situation</u></p> <p>Same position as 47 (Position: that each member NAA will publish their policy on this and circulate to other NAA’s)</p>	Closed
	IP 60	<p><u>Fuel Tank Policy Harmonized Position</u></p> <p>Position: The IMRBPB agrees with the recommendation , IP 57 also addresses this IP.</p>	Closed
	IP 61	<p><u>MRB Inspection Report Inspection Rules</u></p> <p>Position: The IMRBPB concurs with the recommendation but notes that the responsibility for ensuring the maintenance manual is amended rests with the OEM. The definitions for inspections shall be contained within the MRBR</p>	Closed
Action Airbus	IP 62	<p><u>Termination of hardcopy MRB Reports</u></p> <p>Open to Airbus, a copy of the IP needs to be submitted</p>	Open
	IP 63	<p><u>Maintenance Requirements / Flight Deck Door</u></p> <p>The JAA withdrew this IP and will take the issue up internally within the JAA.</p>	Withdrawn
		Next Meeting was set as September 20, 2004	
Action All		All Issue Papers are to submitted 60 days prior to the meeting which would mean July 20, 2004	

Meeting with Industry personnel (21 August 2003)

Industry attendance		
R Anderson	ATA	
A Harbottle	Airbus	
J Bernstorff	Airbus	
A Brytak	Bombardier	
J Kala	Sinex	
S Pierini	Boeing	
D Bethel	Embraer	
L Horton	NWA	
T Tripp	Delta	
M Lombardi	Honeywell	
M Gdalevitch	Honeywell	

The meeting welcomed the industry representatives with associated introductions of all. The Chairman debriefed industry on the IMRBPB meeting.

The format for future meetings was presented, i.e. that the IMRBPB would set aside up to two days for an IMRBPB/Industry meeting, which would take place immediately prior to the IMRBPB meeting. ATA Industry representative Ric Anderson indicated this was a positive move. There was some discussion on the maximum number of Industry representatives without a number being decided. Twenty was thought to be too high.

Industry was advised that any issue papers they generate should be submitted through their regulatory authority at least sixty days prior to meeting. The host IMRBPB member would chair the meeting. All Issue Papers would be posted on the web, currently managed by the JAA. In addition a template of the IP format would be posted as well.

The current status of all IPs was discussed. Current status is that there are a total of 54 Issue Papers. Of those 50 are closed and 4 are open. Industry was informed that IP 27 Development of a generic PPH would proceed on a chapter-by-chapter basis. IP 44, which is leading to the development of an evolution document, would be closed when the document published as a chapter within the generic PPH. Industry commented that there would be harmonization issues but they could certainly be dealt with in future meetings.

IP 48 - With reference to this IP, Industry representative Airbus stated that they would want to comment because their current aircraft diagnostic capability is designed to check daily for the presence of a fault. Airbus feels that if a fault is identified within a 24-hour period it should be considered evident to the operating crew. This was a contentious issue. Subsequently, Airbus enquired if “annunciated before next flight” could be acceptable. There appeared to be general acceptance of this idea.

IP 51 - There was considerable discussion concerning IP 51 pertaining to MSG 3 Revision Authority Acceptance. Industry representative ATA advised that they had no problem with the IMRBPB position. There were some concerns about the actual management of the submittal process. Ric Anderson will formally submit MSG 3 Revisions 2002 and 2003 to the NAAs for review and acceptance. The FAA will coordinate formal acceptance of the revisions by the IMRBPB members.

(Note: ATA agreed to submit all future revisions for acceptance,)

IP 57 - Industry representative Airbus stated that they have concerns about the IMRBPB position adopted for IP 57 "Tasks developed not using MSG-3 logic". They stated that they would not want to use the latest version because such action could initiate a need to re-analyse the entire aircraft to the latest version of MSG-3. The IMRBPB position is that if there is a need for inclusion of tasks and intervals within an MRB Report when developed from a process other than the accepted MRB analytical logic then the tasks and intervals should be reanalysed using the latest version of MSG-3.

IP 61 – The FAA advised the IMRBPB that they would be reinstating their MSG training program.

IP 62 – Termination of Hardcopy MRB reports, this was briefly discussed.

Action: Airbus will provide a copy of the Issue Paper to Transport Canada for inclusion in the files.

The IP remains open.

Industry Presentation:

Ric Anderson of ATA then provided an overview of issues discussed at the industry meeting. In particular, newer health monitoring technology is leading OEMs to want to revisit the analytical logic associated with structures. Industry will create a dedicated working group in 2004 to revisit the logic. Participants would include regulatory authority representatives.

There are industry concerns about the use of the definition for "Serious Injury". Airbus has found that the ICAO Annex 13 definition is being used. The IMRBPB was advised that they need to be more cognizant of the ICAO stated SARPS with which aircraft must be compliant.

Industry had quite a lot to discuss about Evident and Hidden Functional Failures and flight crew performing maintenance. Airbus noted that they would like to re-open IP 59 to ensure that a harmonized position regarding "evidency" is obtained.

Industry has encountered standardization issues with respect to their efforts to develop an "Applications Handbook" and as a result have asked Bombardier to hold their

development of the document. So far the document has included sections that deal with the PPH and Systems. Bombardier will include sections dealing with structures and zonal analysis. Problems have been encountered where some line items in the MSG document are not correct and require amendment. There are also concerns about consistency between issues as they are addressed.

ATA provided an overview of their reorganization. The recent tightening of budgets has led to reduction in staff and a realignment of operational direction. The MPSC will become a communications network only and will not be focused on the production of technical material.

The IMRBPB then broke for a separate caucus to address the hidden failure/evident failure issue. This resulted in the IMRBPB advising Industry when the meeting reconvened that “A failure would be considered evident if annunciation of the failure occurred prior to the next flight.” This position was taken to avoid scenarios where multiple legs could be flown and no awareness would be generated that a failure had occurred.

Action: ATA was requested to develop a definition of “evident failure” and within that definition to include the following “A failure is considered evident if annunciation of the failure occurs prior to the next flight”

Next Meeting

Next Meeting was set as September 20, 2004
All Issue Papers for review by the IMRBPB are to submitted 60 days prior to the meeting which would mean July 20, 2004