

DATE: January 25, 2006

Meeting Minutes: International Maintenance Review Board Policy Board (IMRBPB)

Date: 18 – 20 October 2005

Place: European Aviation Safety Agency (EASA), Cologne, Germany

1. Opening Meeting

The opening meeting was with industry for introductions and a short presentation by Evan Neilson, Flight Standards Manager of EASA.

The status of the answer to 25.1529 other than CMR/ALI/MRBR was discussed. Are all other documents under the control of EASA Flight Standards or considered to be covered by part 21 approval? To be clarified.

EASA's policy is that they will approve all Maintenance Review Board (MRB) Reports. EASA is proposing to have at minimum a representative at each Industry Steering Committee (ISC) and some other bodies, (MWG, STG.). EASA stated that they do not intend to approve a MRB Report that is not considered a living document. All revisions will have to be approved by EASA. The regulatory group will have to come up with procedures for working with all authorities for approval process.

For non EU, JAA member countries, the need of MRBR approval by JAA is questioned. Does JAA need to formally approve MRB reports as EASA/FAA/TCCA or is EASA approval recognized through an agreement between JAA and EASA? To be clarified by JAA.

2. Regulatory Meeting

It was discussed that there is a need to structure the IMRBPB for roles and responsibilities for a Chairman, Co-Chairman, and Secretary. Chairman would be selected for 2 years. Barry Basse was selected as chairman. Co-Chair would be selected for 3 years. Francis Jouvard was selected Co-chair. Secretary would be selected for 2 years. Tom Newcombe was selected secretary.

The Charter will be revised to include the following:

1. Roles and Responsibilities of selected members
2. Signature block to be included for regulatory persons signing charter
3. Revision date needs to be added to Charter
4. Paragraphs changed to reflect new procedures

Draft Issue Papers (IP) are to be submitted to the IMRBPB Chairman 60 days prior to a scheduled meeting. IPs may be submitted through a regulatory agency, Air Transport Association (ATA) of America, or Maintenance Programs Industry Group (MPIG) with substantiating data.

New IP form will be revised to remove reference to any regulatory authority. IP will now have revision number and date if revised. EASA will provide a hot link to previous IP were applicable. Remove the boxes. Word document proposals only for IP and supporting documents may be PDF. Revisions to IP will be submitted with original front page.

IPs will be maintained on the EASA web site. EASA will transfer all IPs from the JAA web site. EASA web site should be available end of 1st quarter 2006.

Meeting proposal: It was determined that a regulatory business meeting the first day would be required to discuss internal business (not IPs), industry could have the first day for their discussion. A joint meeting will be scheduled the 2nd and 3rd day, with caucus as appropriate. First half of fourth day will be a regulatory only meeting review the discussion from the joint meeting and determine a regulatory position. The last half of the fourth day will be a joint meeting to present the regulatory position to industry.

HOSTING NEXT MEETING: The meeting will be hosted by CTA in Brazil October 2 – 6, 2006 (week 40). Visa's may be required.

3. Joint Meeting

Discussed what occurred during the regulatory meeting.

Clean up the IP and log

Information/procedures for how to write and submit IPs will be on EASA web site

EASA will be converted next month from JAA web site to EASA site

Industry wants better wording on the IMRBPB Position and have access to Policy Papers.

A link from the index will show when each authority developed the policy letter.

A date will be added to the index to show what IMRBPB meeting the IP was addressed
IP on the web should be protected.

Industry requested a block or section be added to the IP to indicate their disagreement to an IP.

Industry would like to leave IP 71 (Identifying “Normal” Flight Crew Duties) closed and submit a new on same subject because they did not agree with the regulatory decision.

Industry does not agree with the regulatory position and close out of IP 73. Need to better explain in the position statement. This was discussed and agreed that the position needs to be fully defined. A new IP will be proposed by industry.

Accepted the minutes from the Seattle meeting based on all the comments received on IP 71, 73, and evolution document.

Discussion on letter of acceptance from each authority for MSG-3 acceptance. Need to have side discussion on who signs and what will be sent to ATA.

It was agreed to create an IMRBPB action item list to record any action agreed with who is responsible and the status. This list will be posted on the EASA web site and will be maintained up to date.

Review of IP Log open items

IP 27 is being closed (FAA Project to develop a generic Policy and Procedures Handbook (PPH) for utilizing MSG-3 during the Maintenance Review Board (MRB) process). TCCA will continue to prepare there generic PPH Need to setup a working group to start working this issue

Bombardier gave history on development of the first draft. Did include info from PPH's from mfg. Stopped working on this when MPSC changed to MPIG. Thought regulatory would not buy into this document. Initial was to be able to remove some stuff from the MSG-3 document and put into this manual. Dassault said that a guidance document would be helpful. What might be the benefit for the time spent to develop this? It was discussed that a generic PPH could be a useful training tool for new personnel. Discuss at the regulatory meeting on Thursday. This issue paper will be closed. TCCA will still develop a general guidance material. The IMRBPB decided to close this IP and investigate a different approach for providing guidance material for a PPH. Industry will submit written statement

IP 42 is closed

IP 44 open (MRB Check Interval Escalations) This is still open and Tom N will still put together a working group to address this. Set target date and discuss how this will be published. Policy Letter could be used. Need to have consistency in approach. To include all regulatory authorities. Target date of March 2006.

Position: FAA will organize a regulatory group to establish a process for MRB evolution for discussion with industry. This will be presented to the Industry

IP 54 closed, (Implementation of IMRBPB Positions) Policy should be sent out as soon as possible.

A column with a link and/or reference to the policy implementing the decision will be added to the IP index in order to close this IP. See action item 05/03.

IP 57 closed, (Termination of hard copy of MRB Report) PB members stated no legal concern exists.

IP 62 closed (Task and Interval Incorporation with an MRB Report when developed from a process other than the accepted MRB analytical logic)

IP 67 Closed comment added because it is a duplicate of IP 62.

IP 68 Open, (MSG-3 Definition of “Safety/Serious Injury”) see action for Tom N.

IP 72 Closed (Recognition of an Evident Failure)

IP 78 Closed (Analysis of fuel tank flammability reduction or inerting systems)

IP 79 Closed (Harmonization of different definitions of Principal Structural Elements (PSE) consisting of the FAR and ATA-MSG-3 2003.1)

78-2005 was changed to 87

79-2005 was changed to 88

IP 80 Lightning/HIRF MSG-3 analysis process revision

Boeing presented the discussion of what went on with the working group and the outcome. Some concern on the interpretation of item discussed at the meeting. Airbus proposed to change the term hazardous to non catastrophic. There was discussion on this and there was two separate ways proposed. Leave as is or send back to the group to see if the term they presented should be changed. Will try to contact people in the working group meeting to see if they have any problem with changing the words. Seb stated he would do this. Seb gave a presentation on the HIRF IP to get the group up to speed on the premise of the IP. Front section of MSG-3 will have to be re-written to address new proposal. Need to review any change that would be proposed after this meeting.

Position: The board is in favor for the working group to continue the work as launched with participation of all authorities. However the following should be considered:

Use of the terms catastrophic/hazardous to be reviewed

Use of an assurance plan to be well defined and specified with goals and deliverables.

Status: Open

Action Item: 05/10

IP 81 MSG-3 Analysis requiring that Fatigue Tasks (Airworthiness Limitation Items) be placed in the Structures Section of the Maintenance Schedule.

TCCA gave a presentation on IP. Confusion when coming from D5 to P18/P19 and P20, Duplication of tasks. FAA presented information from IP 82 and Airbus presented information from the MPIG proposal. A lot of discussion on this. No decision at this time, the regulatory body will discuss and come back with decision.

Basic principle as presented by MPIG/Airbus accepted provided the SSI/PSE selection block is clarified (the decision point referring to this selection should state “does this SSI contain a PSE or suitable text explaining the use of the decision point should be provided.

Position: After reviewing again it will be sent back to MPIG to be corrected and resubmitted.

Status: Open

Action Item: 05/06

IP 82 Separation of Airworthiness Limitations from Structural Inspection Requirements – PSE’s vs. SSI’s
Same issue as 81

Position: IMRBPB consider this issue to be addressed thru IP81. See issue paper 81 for IMRBPB position.

Status: Closed

IP 83 Letter of Confirmation
To be discussed during the regulatory meeting.

Position: A draft letter of confirmation will be circulated among authorities for only the title of the sections to be addressed in the letter. Make sure to include all regulatory people.

Status: Open

Action Item: 05/07

IP 84 Revision 1 Hidden functions of safety/emergency systems or equipment MSG-3 category selection
Embraer stated their position that after installing a second loop for dispatch reliability they would request to not have a safety route and not be penalized for installing it. There was much discussion regarding relief for redundancy. The IMRBPB proposed the possibility of having a latent failure with the redundant item evident.

Embraer objects to the changed wording and would like to come back with an additional response.

Position: The IMRBPB would prefer the following wording:

“For hidden functions of safety/emergency systems or equipment, the additional failure is the event for which this function of the system or equipment is designed, and these cases, where the system has no redundancies, a FEC 8 is to be selected. For redundant systems, if the system failure remains hidden after failure of the first redundancy, a FEC 8 is also to be selected.”

Status: Closed

IP 85 Protective Systems

After further discussion, it was determined that MSG-3 already considers this as safety/protective system.

Position: PB considers that MSG-3 adequately covers this issue.

Note: FAA confirms the question in this issue is question 3 not question 2 for level 1 as mentioned in the text.

Status: Closed

IP 86 Revision 1 dated September 2005 Non regular operation, short/long term storage procedures

Statement that the mrb does not address non regular operation if operator puts aircraft in storage every once in a while.

There are no standard cases of how the aircraft is stored.

Manufactures have different times to address low utilization.

Proposal to have all mfg have 100 hour limit.

Boeing will send Francis information

Proposal to add statement in MRBs to address non regular operation of the aircraft.

Manufactures do have storage programs

Maybe revise wording already in MRB.

Position: This is considered open pending further discussion and completion of action item.

Status: Open

Action Item: 05/08

IP 87 Approval of Dual MRBRs for the same aircraft model

Cliff would like to table this for regulatory discussion.

How does one manage both reports for the same aircraft in-service.

Industry said they would be available for discussion on this subject.

Position: Regulators need further discussion to come to a final position.

Status: Open

Action Item: 05/09

IP 88 Consideration of Wear Damage in Structure Analysis

Airbus presented to the group the reason for the IP. SSI analyzed as MSI is currently done but general discussion was whether anything should be added to check for wear on only pure structure items.

The June MPIG meeting did not support this IP. Discussion in the meeting was that industry would like to withdraw this IP.

Boeing will look into if any of their documents mention wear on structure. Dassault checks for wear and fretting on structure. Embraer does not address wear for structure. Need to come up with something where the manufacture deals with this if needed. Recommendation to leave this IP open.

Position: Agreement from industry to revise the recommendation of this IP. PB waiting for revised version prior to position

Status: Open

Action Item: 05/01 and 05/02

Embraer proposed process for coordinating MSG-3 derived tasks with Certification Maintenance Requirements (CMR's)

Embraer presented their concern regarding MSG-3 vs CMR items.

Candidate CMRs are discussed, tasked are changed to a different route. ISC chairman accepts and tasks go into document with no tracking. MSG-3 analysis does not support the task. Tony gave background history. Discussion on allowing ISC chairman to accept a reduction in interval. Embraer had TAD attend MRB and wanted Embraer to get ACO approval on a MRB item.

Position: This item is sent back to MPIG for further discussion and re-submitted to the Board. When resubmitted, an IP number will be assigned.

Status: Open

Action Item:



Barry Basse
IMRBPB Chairman