

2009 IMRBPB Meeting Sao Jose dos Campos, Brazil Hosted by ANAC

IMRBPB MINUTES:

Tuesday March 31, 2009

Meeting called to order by Francis Jouvard IMRBPB Chairman

Welcome and presentation by ANAC. Introduction of Policy Board (PB) and Maintenance Programs Industry Group (MPIG) members attending.

PB and MPIG broke into separate meeting for the remainder of the day.

Wednesday April 1, 2009

Meeting called to order by Francis

Regulatory Meeting Feedback informing IMRBPB members of the Board Elections appointed for two years effective 03/31/09:

Chairman Francis Jouvard

Co Chairman Lynn Pierce

Secretary Rick Ralston

MPIG Briefing by Tony Harbottle

Chairman Tony Harbottle

Vice Chairman Harry Demarest

Secretary Craig Fabian

Operator Representative Kevin Berger is filling in for the Vice Chairman

Francis updated the EASA IMRBPB Focus Point Site

2008 Meeting Minute are accepted by MPIG

Action Item Review:

05/07-IP 83 Tony-Industry reviewed this at the MPIG meeting discussion regulatory differences could have different rating tables applied based on the language “regulatory differences will be defined in an appendix to the PPH”. What is the status of an Observer?

Action Item: Clarify position of regulatory hosting authorities and signing authorities. Clarify position of Observer in MRBR activities; PB to review regulations.

05/09-IP 87 Dual MRBR's. Kevin-A pre MSG 3 aircraft turned over to another operator how and what program will that aircraft be maintained MSG 2 or MSG 3? Lynn-The aircraft can be maintained under MSG 2. Brian-Does Industry need to get clarification that a new operator may use MSG 2? Cliff-If the OEM is amending their MSG 2 program how does this flow down to the Operator level? Tom-The operator must comply with new requirements i.e. EZAP, SFAR 88, etc.

FAA and TCCA will allow an operator to use MSG 2. Brazil will allow MSG 2.

From EASA side an operator maintenance program already approved and developed based on a MSG2 program is still valid. However a new operator should develop its new operator maintenance program on the latest approved MRBR document i.e. MSG 3 considering MSG 2 based MRBR is not EASA approved.

IP 87 Closed 04/01/09

08/06-IP 44. Demonstrate why the 2% deviation or an equivalent level of reliability should not be in the evolution guideline. Francis provided a PB overview and stated that a case by case basis will be evaluated by the Host RA. Lynn-The basis for the PB decision is in paragraph 7.2 allowing the Host RA to place this in the PPH. Tony-Industry has not been able to discuss this latest comment from the PB. With this now documented in IP 44 the OEM's have a standard to work towards. MPIG they will accept IP 44. Tony-New MPIG Question: What is going to happen to the IP 44 guidelines for the future and a regulatory position on where IP 44 will be posted? Lynn-FAA Notice will lay out the criteria of IP 44 and that will be incorporated into FAA Order 8900.1. Francis-EASA reference to IP 44 will be in Chapter 16. Jeff-TCCA with new organization there is a new publication format. TP 13850 will become an Advisory Circular in the future and IP 44 will be in that document. Tony-MPIG is concerned about a RA modifying IP 44 when inserting that document into their individual RA guidance. MPIG would like to propose that the IP 44 text to become part of the MSG 3 document and accepted by the Industry. PB closed 08/06

Action Item: MPIG will have further discussion during their next meeting of whether or not IP 44 should be included in to the ATA MSG-3.

08/03-IP 44 Regulatory to define the proposed terms and amend the guideline as required through issue 2. PB will assure any future revision will go through the IMRBPB and include industry in any revision process. AI 08/03 will remain Open to improve the process for future revisions. Brian-If industry requests a future change to IP 44 would they go through the Candidate IP process-answer is Yes.

08/03 Remains Open

05/05 IP 71 Action performed by Flight Crew. Tony-MPIG has raised new Candidate IP 2008-5, 2008-6, 2008-7 and they are not prepared to discuss today. There will be examples included in each IP. This will be raised at the 2010. 05/05 will remain Open due to ongoing activity.

07/02 New IP to clarify FD analysis in relation with IP 81.

08/01 Remains Open

08/04 Remains Open

08/05 Tony-It might be impossible for OEM's Internal Process for a common method to validate. Tom-Can the PB agree with Tony and close this AI out? Francis-PB needs to discuss
Action Item: PB to discuss this.

Group Picture Time to be posted on the EASA site.

08/06 Closed

IP-92 Structural Health Monitoring (SHM) Tony-MPIG presentation from Lawrence. The definition SHM will be defined in three categories. 1-Scheduled-Needs Human Interaction. 2-Continuous Monitoring. 3-Diagnostic Approach. This issue paper would only allow Category 1 and an AMM task would identify everything necessary. Francis-PB reviewed yesterday. PB recommends PPH reference to be added to the paragraph. Lynn-wording needs to be included that the procedure needs to be validated. PB and MPIG discussion regarding the validation process and who or how this is validated. Tony-recommended "The manufacturer may propose a validated SHM application as long as it satisfies the detection requirements". Other changes made through the IP to include "validated". PB-MPIG discussion regarding the flow chart and diamond #9 Inspection. Tony-What about removing the word Inspection and put in the word Task? Francis-is this flow chart in conflict with CIP #3? Francis proposal to review CIP #3 first then come back to this IP 92.

CIP #3 (IP 103) Redefinition of FD analysis in MSG 3. Submitter Embraer. Israel provided a brief history and an overview of the CIP. Section 2-4-2: addition of a new paragraph "AD and ED analysis is done by means of an assessment based on a rating system as described in 2-4-5. FD analysis (as part - - - " Embraer proposes the removal of paragraphs and t, etc. Section 2-4-5 rating system-addition of a paragraph. (See document for details) Francis-What is FAA position. Tony-Recommended a Caucus for MPIG and PB. Francis-Recommended that the Caucus be conducted at the end of the day. It was determined the Caucus will be from 1-2PM.

Lunch Break-

Caucus groups returned at 2PM

Action Item: MPIG would like to propose that the IP 44 text to become part of the ATA MSG 3 PB Position-PB is not in favor of attaching IP #44 guideline in the appendix of MSG 3. PB considers that MSG 3 document is a tool for development of maintenance schedule task and should not be related to IP 44 guidance.

Action Item 08/05: AI has been inappropriately worded. This should be handled at the OEM/PPH level for each evolution project.

IP 103: Tony represented the latest changes. PB Position-will accept the latest proposal with some additional language in paragraph s include some additional language of various inspection methods. **MPIG Action Item:** MPIG will come up with additional language of various inspection methods by the end of the week.

PB and MPIG had detailed discussion regarding this. **MPIG Action Item:** Francis recommendation that MPIG caucus provide PB an update. Open.

Tony-MPIG SHM proposal to synchronize IP 92 and IP 103 change of word Inspection to Task. D8 from Can inspection methods be improved to Can task requirements be improved? P18 change. D7 Change from “Can FD be detected by visual inspection at practical intervals?”

IP 93 PB Position-Open no additional action to be discussed 2010

IP-94 PB Position-to only keep the first paragraph. **MPIG Action Item:** MPIG will take time to review the new proposal and will come back with a position by the end of the week.

IP-95 Joel-MPIG proposal to keep a simple definition at this time. 1-Too much detail compared to existing definitions of AD, ED, FD. 2-Not simply a definition. Propose to close this IP with the simple definition. **PB Action Item:** To discuss in caucus.

IP-96 Tony-not ready to provide MPIG comments on this IP at this time. MPIG will re-launch this after this meeting and will review this at the next MPIG meeting late this year. Remains Open.

Next MPIG meeting proposed for November 3-5, 2009 in Bordeaux, France.

Close of meeting to review minutes

Thursday 04/02/09

Francis opened the meeting

IP-95 PB is willing to review the policy on wear if MPIG can provide a place for wear in the MSG 3 document. Otherwise we would want the definition to remain in the Glossary.

MPIG Wants their position to be documented on Issue Papers PB Position: A record of all discussion and answer related to each IP will be recorded and traced in a document attached to each IP. The submitter of the IP will be required to keep the document updated. This document will be available on the EASA web site. The document will be titled Issue Paper Comment Document (IPCD).

Annual Meeting: Future IMRBPB meeting will be the last full week of April each year.

Tony-**MPIG Action Item: MPIG will caucus on where to put the “wear” requirements in the MSG-3 document.** MPIG thanks PB for the future meeting date. The next MPIG is the first full week of November 2009.

IP 97 Fluid Spillage. Ralf-PB had not received official MPIG comments. Tony-Comments have been posted and MPIG is ready to present their position on this IP. MPIG stated this presentation is available on the EASA site. MPIG Presentation-MPIG WG consisted of OEM’s and they proposed the following changes available in their presentation, example-Accidental Damage-removed composite references, erosion from rain, freezing, thawing, etc. Environmental Deterioration-removal of chemical, corrosion due to galley spillage, etc., see IP. Francis-PB has had no time to review this. Lynn-does the PB want to caucus. Jeff-I did not have the original and revised proposal to review. Cliff-numerous questions to MPIG. **PB Action Item: Caucus and discussion.**

IP 98 PB will launch a WG to discuss this IP. Tony-MPIG discussed at the meeting. There is confusion that in the technology that needs to be discussed. Limit of Validity of TD needs to be addressed from the point of view design. This is not a calendar issue. MPIG will respond with the reworded version and send them to the PB. **Action Item: PB Position-we will revisit this IP with a WG.**

IP 99 MRBR and ETOPS. PB position to focus on ETOPS only. MPIG Brian-for Boeing aircraft initially certified (out of the box) and the way it is looked at is that every flight is ETOPS. So there are no Non-ETOPS or Only-ETOPS Flights. Tom-FAA IP’s have been written for Airbus 350, etc. MPIG is concerned that future aircraft with this requirement placed on them might or might not be operated in an ETOPS environment and place undue financial burden on operators that might not be in ETOPS. MPIG-PB discussion. Tony-Is there a proposal from the PB? Jeff-I think there needs to be a revision to MSG 3. Kevin-The maintenance schedule should clearly describe those tasks which are needed to be staggered because they effect critical systems that impact ETOPS. It becomes very difficult to sort. Gary-Draft AC 25-1385 ETOPS is not available for the public **PB Action Item: PB will caucus.**

IP 100 Partial Use of MSG 3

PB Position is that:

1. The latest version of MSG 3 shall be used in its entirety for the development of the MRBR.
2. That the sentence “you may choose to use them in whole, in part, or not at all” to be removed from the MSG 3 document.

MPIG/ATA Craig stated that Item #2 is a legal disclaimer that ATA puts into the document. Tony-MPIG thought the IP was going to be presented. This should not be a derivative aircraft it should be a new TC. **PB Action Item: PB caucus and review MPIG comments.**

Reopen IP 78 Analysis of fuel tank flammability reduction or interring systems. Purpose is to change the position of the PB. It has been agreed by NAA’s not to force the analysis into a

Route 8 when the actual analysis is other than a Route 8. MPIG-we have followed this with interest and we are willing to work with that outcome. **PB Action Item: PB will caucus and provide updated IP.**

(CIP#1) IP 101 Zonal transfer of safety related system tasks. PB Position: The MSG 3 document should be revised in order to add a statement that would prevent the transfer of FEC 5 and 8 GVI tasks to the zonal program, in order not to lose traceability of those safety related tasks in case of any revisions of the relevant zonal event. MPIG-No objection and we would like to know where this should be placed in MSG 3. Close this issue paper. **MPIG Action Item: MPIG to develop appropriate wording for an amendment on the MSG 3 2009 Revision.**

MPIG question: When does the candidate IP become a formal IP, number assigned when first discussed at the IMRBPB level.

(CIP#2) IP 102 Window Utilization Extension/Modification. MPIG-Two issues in one paper. 1-Low Utilization (LUMP) there is insufficient guidance and different practices are used by each OEM. 2-High Utilization (HUMP) where some operators are operating beyond the original expectation in the MRBR. On the High Utilization MPIG we can not see the concern. Cliff-One operator that had an accident and the operator was extremely outside of the high utilization of the envelope. MPIG-OEM's are not sure what to do when HUMP is the issue. PB/MPIG discussion of other maintenance program. PB does not agree. Cliff-Recommend a PB Caucus. Brian-I'm not sure that the MPIG position addresses this IP now.

PB Position- **PB Action Item: PB will launch a Regulatory WG to address this issue and come up with guidance.**

Various: ATA is not sure they want to specifically address helicopters as part of MSG-3. Brian Jenkins from Bell Helicopter stated that they would like to use MSG-3 and have been trying to use sections of the MSG-3 logic. A separate document was discussed. This brought about comments from Craig Fabian (ATA) that we probably ATA needs to take another look at this. Sikorsky, Eurocopter, Agusta and Bell have had meeting to look at coming up with a common philosophy, and the intent is to establish a WG with the intent to develop a version of MSG 3 that will be applicable to the Rotary Wing World.

Lunch Break. PB Caucus. MPIG would like to caucus on some of their items and bring to PB by 4PM.

4PM IMRBPB returns from caucus:

Tomorrow 1PM ANAC Director presentation.

Tour of Embraer facility tomorrow 2PM-3PM.

PB Position IP 98 Revision 1:

1. DSG should be mentioned a part of the assumptions taken into consideration during analysis for each MRBR

2. In the absence of IP44 data, all MSG 3 analysis will need to be revisited and validated but reanalysis may not be required.

Joel-What relationship is IP 44 to DSG? PB-MPIG discussion. Brian-This has a large impact on all OEM's-Can MPIG have a WG to harmonize and work toward the same goals as OEM's.

MPIG Action Item: We will discuss this among MPIG and come up with a position to present to the PB by Friday 04/03/09.

MPIG presents their review and proposals of IP92/103, IP 95-Wear and ETOP's:

IP 95 Wear Damage in MSG 3. Closed with the following items (see closed IP 95)

Appendix A Glossary: Wear Damage – Physical deterioration of the surface of an item due to relative motion between two parts in contact.

Para 2-4-2 Scheduled Structural Maintenance: see second paragraph. IMRPBP Accepts changes:
IP 95 Closed

IP 92 SHM and IP 103 Flow chart changes. **MPIG Action Item:** PB requests MPIG provide final clean document with changes presented to PB for tomorrow morning PB review.

PB meeting tomorrow 8AM with MPIG joining at 10AM

Meeting adjourned at 6:15PM

Friday 04/03/09

11:00AM IMRPBP reconvenes

Francis-Goal is to try to close IP's and go through MPIG files. Review Open IP's. At 2PM we will be going to Embraer for 1.5 Hrs. P

PB has recognized the need to have a PB meeting one month after the MPIG/ATA meeting to review the outcome of the MPIG meeting. A review of the Charter will be conducted to review Candidate Issue Papers process.

IP 78 Analysis of Fuel Tank Safety. PB position to Close: The IMRPBP considers that fuel tank flammability reduction or inerting systems should be classified as emergency/safety equipment. The MSG 3 analysis would then be applied correctly considering this classification.

Tony-Will there be a requirement for OEM's to revisit past analysis? Francis-EASA No. Lynn-FAA position we are not going to make retroactive requirements, but if the analysis is revisited then the MRB Chairman will determine the appropriate category. Tony-This is a change in policy and a change from what was discussed earlier this week. Industry agrees with the original IP.

IP 101 Zonal transfer of safety related system tasks. PB position to Close: MPIG to develop appropriate wording for an amendment on the MSG 3 2009 Revision. Wording to be added to the zonal section Chapter 2-5-1, paragraph h.

IP 100 Partial Use of MSG 3. PB position to Close:

1. When developing an MRB process for a new certificated aircraft type the full MSG 3 should be used.
2. With reference to the recommendation item 2: IMRBPB acknowledge ATA statement that this is a legal disclaimer and has no bearing on the MSG document.

IP 99 MRBR and ETOPS. PB position to Close: For aircraft initially certified for ETOPS operation, ensure all scheduled maintenance tasks will be addressed from an ETOPS perspective. This statement should be added in MSG 3 Chapter 1.1 at the end of the second paragraph in the 2009 revision.

Tony-Industry presentation. MPIG has located two locations for additional sentences to demonstrate to the ACO. Presentation provided to IMRBPB Chairman. Francis requested PB comments. Jeff-Not opposed to adding this to the MSG 3 however, some operational environments there have been additional requirements. Jeff-The caution is that an operational requirement or NAA requirement may require something additional over the MRBR. MPIG-Tony feels that another issue paper needs to be developed and industry needs to be able to have than ability to develop both ETOPS and non ETOPS requirements and both sets of tasks be entered in the MRBR.

IMRBPB final position to Close with MPIG changes IP 99 Revision 2.

IP 92 and IP 103. MPIG had provided a clean document based on the presentation from yesterday. IMRBPB reviewed those changes (see MPIG document). MPIG hopes that the PB can accept the changes to close both IP's. Francis-Does the PB find this acceptable? Yes.

IMRBPB final position is to Close IP 92 and IP 103 with combined MPIG changes presented to be implemented in MSG 3 Revision 2009.

MPIG had a goal to see how SHM can be used in the future and a dedicated WG will look at the other categories of SHM. MPIG would welcome PB or NAA Specialist participation.

IP 94 SSI Paragraph 2-4-4-1 Scheduled Structural Maintenance Development-Procedure
MPIG-Presentation to add "Note" 2-4-4-1 following b and (see MPIG document).

IMRBPB final position to Close IP 94 with MPIG changes IP 94 to be added in MSG 3 revision 2009.

AI 05/05 Open

AI 05/07 and IP 83 Closed

AI 5/09 and IP 87 Closed

AI 07/02 Closed through IP 103

AI 08/03 Open PB Action Item: Lynn and Francis will develop a revision process for the IP 44 document that will define when revisions are made and how they are circulated between the IMRBPB and the MPIG.

AI 08/04 Open

AI 08/05 Closed

AI 08/06 Closed

Two remain open 08/01 and 08/04

IP's REMAINING OPEN:

IP 96 Open.

IP-97 Open: PB Action Item: Review with a coordinated answer using MPIG files provided-a coordinated response from PB will be sent to MPIG by November 2009.

IP 98 Open: Brian-presentation and proposal from MPIG (see MPIG document). This will remain Open. Remain Open **PB Action Item:** will be added to the December PB meeting in Ottawa to review aspects of the presentation.

IP 99 Closed

IP 100 Closed

IP 101 Closed

IP 102 Open: PB Action Item: PB will launch a Regulatory WG to address this issue and come up with guidance.

IP 103 Closed

IP 84 MPIG raised that the closing action for this IP has not been included in MSG and will include this in the next MSG revision.

IP 44 Peter requested information regarding any discussion to extend the date on IP 44? PB-did not discuss any extension of the April 2009 date.

MPIG-Some US MPIG members need a Formal Invitation to be invited to a Foreign Country.
PB Action Item: This will be coordinated with the Host NAA and the IMRBPB.

MPIG extended their thanks to ANAC and the PB. There are many issues and they will try to keep the number of IP to a minimum and try to focus on important IP and resolve those in this forum.

PG Francis extended the PG thanks to ANAC and MPIG.

Next IMRBPB Meeting April 26-30, 2010 Singapore

MPIG Meeting November 3-5, 2009 Bordeaux, France

PB Meeting December 1-3, 2009, Ottawa, Canada.

ANAC Director Presentation

Meeting adjourned at 2:30 PM

05/07/2009: After a review of the Minutes Jeff Phipps commented: "I know that the protocols have already been set for these activities but it may be more productive to make a Decision Record that links to the Action Items and Issue Papers as opposed to this method of Minute taking".

