Title: Removal of MRB and CMCC process coordination section from the MSG-3 document

Submitter: MPIG

Issue:
The interface of the MRB and CMCC processes is not dependent upon the MSG-3 methodology and guidance should not be placed in the MSG-3 document.

Moreover, the current MSG-3 Section 2-3-8 (6) Certification Maintenance Requirements (CMRs) Section is outdated given the latest guidelines issued by some regulatory authorities.

Problem:
Current MSG-3 document does not reflect differences among regulatory guidance related to the CCMRs. Given that the CCMR/CMCC does not influence the application of the MSG-3 methodology, the description of the interface process should not be placed in the MSG-3 document.

It is recognized that the subject is currently under discussion amongst the certification authorities, in order to better harmonize the CMCC process. With the removal of this text from the MSG-3 document, the Systems MSG-3 analysis would be developed solely based on the MSG-3 methodology.

Recommendation (including Implementation):
1) Delete references to the CCMR/CMCC process in the MSG-3 Document Changes (Changed text in blue, removed text in red):

2-3-8. Systems/Powerplant Task Interval Determination
6. Certification Maintenance Requirements (CMRs)

In addition to those tasks and intervals established through MSG-3 analysis, scheduled maintenance tasks may arise within the certification process (e.g. from compliance with 25.1309).

A CMR is a required scheduled maintenance task, established during the design certification of the airplane systems as an operating limitation of the type certificate or supplemental type certificate. CMRs are a subset of the instructions for continued airworthiness identified during the type certification process. A CMR usually results from a formal, numerical analysis conducted to show compliance with the requirements applicable to catastrophic and hazardous failure conditions. A CMR is intended 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. A CMR can also
be used to establish a required task to detect an impending wear-out of an item whose failure is associated with a hazardous or catastrophic failure condition. It is important to note that CMRs are derived from a fundamentally different analysis process than the maintenance tasks and intervals that result from MSG-3 analysis. The process for coordinating MSG-3 derived tasks with CCMRs involves a Certification Maintenance Coordination Committee (CMCC). The CMCC may influence the MWG's decision as per the flowchart (figure 2-3.8.6). This process provides an acceptable means to identify when a CMR designation may not be necessary if there is an equivalent MSG-3 task to accommodate the CCMR.

Flowchart Procedure (Figure 2-3.8.6.):
1. CMCC identifies the CCMR’s from the Safety Analyses (SA).
2. CMCC determines if a MSG-3 defined safety category task exists that will detect the latent failure identified in the SA.
3. If a MSG-3 task does not exist, the CMCC will ask the ISC/WG if a reassessment of the MSG-3 analysis is possible to include a task, based on additional information provided by the SA report.
4. If the reassessment was performed, and a MSG-3 task generated, does that task meet the interval and scope of the CCMR? If the scope does not meet the intent of the CCMR, go directly to box 8.
5. If the reassessment was not performed, or if the reassessment did not generate a MSG-3 task, then the CCMR becomes a CMR.
6. The MSG-3 task is considered to properly cover the CCMR.
7. The ISC/WG may accept a CMCC-proposed reduction in the MSG-3 task interval, in lieu of a CMR. ISC/WG should consider advantages and disadvantages of either. No change to scope should be acceptable.
8. If the ISC/WG does not accept the CMCC proposed change, then a CMR is established. The CMR and MSG-3 tasks remain independent.
9. If the ISC/WG accepts the CMCC proposed task, the revised MSG-3 task is considered to properly cover the CCMR.

[Comment] Current flowchart below to be deleted.
2) Numbering of existing Section 7 shall be changed to 6: 76. Sampling

3) Numbering of existing Section 8 shall be changed to 7 only for Volume 2: 87. Controlled Service Introduction

NOTE: The original CIP proposal was submitted by Gulfstream and Archer.
**Issue Paper (IP)**

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<td><strong>Position:</strong> Agreed, closed in 2022 meeting as IP 204</td>
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<td><strong>Recommendation for Implementation:</strong> As per effective date</td>
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| Status of the Issue Paper: |  
|---------------------------|---|
| Active                    | X |
| Incorporated in MSG-3 / IMPS (with details)                                 |
| Archived                  |   |

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