



Issue Paper (IP)

IP Number: 217

Initial Date (DD/MMM/YYYY): 17/May/2024

Revision - Date (DD/MMM/YYYY): Rev. 0 / 17/May/2024

Effective Date (DD/MMM/YYYY): 16/Jul/2024

Retroactivity (Y/N): N

Title:	Establish Policy related to the TCH MRBR ICA's and Vendor/Supplier CMM's
Submitter:	MPIG

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

Issue:

When MRBR tasks are developed with strict reliance on the supplier/vendor's source data documents, such as the Component Maintenance Manual (CMM), by the Industry Working Groups (IWG) and ISC there can be inadequate MRB/ISC surveillance/audit and management control of the MRBR ICA's requirements both for aircraft certification and continuing airworthiness compliance requirements.

This occurs when the TCH/OEM has no constant authority or monitoring activity over the textual detail content related to an MRBR ICA as defined by development criteria requirements of 2-1-2. Approach 3.) Method for Scheduled Maintenance Development.

This section states "The ISC will define the information to be presented to the working group to support their task selection decision and to provide traceability of task requirements in the development of the supporting ICA".

This statement indicates the annotation of the MRBR ATA task code identification assignment in the MRBR associated with the supplier/vendor's related published ICA instructions.

Without procedural detail the supplier/vendor textual detail might have to be assumed to meet the MRBR ICA task intent at the initial publication for certification and over the operational design life of the aircraft.

The lack of a harmonized approach to ensure the continuous alignment and equivalency of the MRBR ICA task intent compliance requirements with vendor/suppliers result in several significant continuing airworthiness management and periodic MRBR audit problems for the MRB, ISC and operators.

The International MRB/MTB Process Standard (IMPS) and the MSG-3 documents do not currently provide instructional detail/guidance (i.e., policy, process, procedure) to address this issue.



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Problem:

There are many problems that can result from this lack of management control and surveillance guidance over outsourced MRBR ICA compliance detail requirements:

1. The MSG-3 analysis task summary data sheet detailed instructions, procedures and/or requirements may not be adequately or precisely contained in the supplier/vendor source data, typically a CMM to demonstrate compliance with the MRBR task(s).
2. The CMM instructional detail and referenced data used during initial MRBR ICA development for aircraft certification, may not be sustained over the operational life of the aircraft, as supplier/vendor companies are sold or out of business.
3. Details associated with the MRBR task requirements may be altered without the knowledge of the aircraft OEM/TCH over the operational life of the aircraft.
4. CMM instructional detail may not be updated as a result of task evolution or equipment/system alterations (i.e., Service Bulletins, Modification summaries, etc.) by the TCH/OEM, or incorporated by the supplier/vendor.
5. The owner/operator may not have access to the supplier/vendor CMM as required by CAA regulation to provide ICAs at aircraft delivery to the owner/operator to sustain continuous airworthiness.
6. Owner/Operator maintenance providers may not have the TCH/OEM designated CMM ICA's, but instead use other maintenance providers with their own unique approved maintenance instructions detail. In these cases, the CMM's may have an alternate means of compliance to maintain the TSO article (i.e., component, part, item), which does not address the MRBR ICA task requirements.
7. The continuous airworthiness records (i.e., CAA Authorised Release Certificates) related to the work completed in accordance with the CMM as produced by the supplier/vendor may not demonstrate or clearly indicate compliance with the TCH/OEM MRBR specific ATA task(s) codes.
8. The continuous airworthiness records provided to the operator by the supplier/vendor may have CMM detail referenced that does not match the specific instructions in the TCH/OEM ICA (i.e., MRBR ATA task code)
9. For common commercial parts (i.e., TSO parts) used between multiple TCH/OEM aircraft types the "Off-Aircraft" MRB task requirements and TCH/OEM ICA instructions may be different in requirements and scope for each TCH/OEM MRBR task (i.e., gas regulators, valves, landing gear, starters, ELT, FDR, etc.).



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10. Aircraft and maintenance program surveillance is difficult or can be incomplete as access and reference to the current source documents may not be readily available.
11. MRB/ISC MRBR Periodic audits requirements as listed in IMPS 9.2 does not list a line item to review outsourced MRBR ICAs to ensure sustaining compliance with the MRBR task requirements while also ensuring data collection to validate the efficacy of the task(s).

Recommendation (including Implementation):

In comment, within the problem statement above some of the problems are directly related to the MSG-3/MRB/ISC policies, process and procedures while others are indirectly related to or are a consequence of not having guidance to address the “Issue” statement.

Add additional guidance in two sections of the IMPS document which address the policies related to the development and reference to ICA traceability. The additions are directly under the purview of the IMRBPB IMPS document and directed by the MSG-3 requirements of 2-1-2. Approach 3.) Method for Scheduled Maintenance Development.

IMPS Revision:

- 3.7 The type certificate holder has the responsibility to develop a methodology to validate the maintenance procedures written to support the completion of MRBR tasks. The objective of the validation is to ensure the maintenance procedure can be performed and that the intent of the MRBR task is also complied with. The results of the validation shall be made available to the CA or VA upon request. If task validation finds that the intent of the MRB task cannot be met, this should be fed back to the ISC. They should review the analysis for possible errors and correct as required.
- 3.8 The OEM/TCH must propose to the MRB/MTB a process to ensure that, for all MRBR/MTBR ICAs, the traceability to the task scope, task intent and task identification (i.e., ATA Code) is sustained for both ICA’s published in OEM/TCH documents and vendor/supplier source data documents (e.g., CMM, EMM, etc.) The process shall be documented or referenced in the PPH after acceptance by the MRB/MTB and in place for initial certification as well as continuing MRBR/MTBR ICA management.
- ~~3.8~~3.9 Representatives of guest NAA's should only participate in the MRB, ISC, and/or WG activities as provided by the letter of confirmation. Representatives of guest NAA's may attend ISC meetings if agreed to by the ISC Chairperson/Co-Chairperson, based on the invitation from the MRB Chairperson. A guest NAA is normally neither a CA nor a VA but could be representing a country who is, or may become, an operator of the aircraft. See Section 10 for further details.



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3.9.3.10 Throughout this document, the term “meeting” may refer to either a physical and/or a virtual meeting, and in addition, may reflect defined periods during which group activity is performed continuously using interactive tools.

9.2 Minimum content of a Periodic Review

- Review of the status of Vendor Recommendations and related changes (ref. par. 4.6.5) for their potential impact on MSG-3 analyses.
- Review of MRBR/MTBR ICAs published in vendor/supplier source data documents (e.g., CMM) to validate alignment with or equivalency to the MSG-3 logic selected task type, intent and scope.



International MRB Policy Board

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IMRBPB Position:	
Date:	17 May 2024
Position:	Agreed, closed in 2024 meeting as IP 217
Recommendation for Implementation:	As per effective date

Status of the Issue Paper:	<input checked="" type="checkbox"/>	Active
	<input type="checkbox"/>	Incorporated in MSG-3 / IMPS (with details)
	<input type="checkbox"/>	Archived