

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Airbus	Multiple	Multiple	Typographical errors are grouped together. These should be obvious and are expected to be addressed before publication. No comment necessary	<p>P7 of 16: 5. 4th para. ...with the IMPS provides guidance...</p> <p>P11 of 16: para 5.5. Bullet 2. The Applicant shall clearly demonstrate...</p> <p>P12 of 16: para 5.6.3. ...can only be opened by the...</p> <p>P13 of 16: para 5.6.7.6... and a list of MSI's for which no tasks have been selected.</p> <p>P15 of 16: para 5.6.8.6a. ...other forms of damages (no 's')</p> <p>General: Inconsistent use of 'MRBR', 'MRB R', 'MRB report' and 'MRB Report'. Airbus suggests 'MRB Report' is used throughout.</p>	NO	YES	Agreed	<p>Typographical errors have been corrected.</p> <p>For the inconsistent use of 'MRBR', 'MRB R', 'MRB report' and 'MRB Report', the 'MRBR' has been chosen (it is included in the list of acronyms).</p>
2	Airbus	§1.1.	3/16	<p>The first sentence of this paragraph is misleading or inaccurate: the Aircraft Maintenance Programme (AMP) required by the point M.A.302 cannot be produced only on the basis of Manufacturer Scheduled Maintenance Requirements.</p> <p>The AMC M.A.302 indicates that the AMP includes, <u>amongst others</u>, the 'maintenance schedule', which is intended to embrace the scheduled maintenance tasks alone.</p> <p>Further, the requirements introduced in the maintenance schedule are not exclusively originating from the MRBR.</p> <p>Airbus propose to use lower case letters to avoid an interpretation that all the manufacturer scheduled maintenance requirements will be provided by this CM. i.e. to avoid MSMR appearing to be the name of the resulting document</p>	<p>It is proposed to modify this paragraph to read:</p> <p>"The purpose of this Certification Memorandum is to provide acceptable procedures and guidelines for the development of Mmanufacturer Sscheduled Mmaintenance Rrequirements that will be used as one of the sources to develop/revise the maintenance schedule of from which the aircraft maintenance programme specified in Annex 1 (Part M) to Commission Regulation (EC) No. 1321/2014 (or equivalent State of Registry requirements) can be produced."</p>	NO	YES	Agreed	The paragraph has been modified as suggested.

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3	Airbus	§1.1.	3/16	The second sentence of this paragraph is misleading or inaccurate: with respect to large aeroplanes, the CS 25 Appendix H, paragraph H25.3, sub-paragraph (b)(1) refers to scheduling information that provides the <u>recommended</u> periods at which each part of the aeroplane and its engines, auxiliary power units, propellers, accessories, instruments, and equipment should be maintained, and the maintenance <u>recommended</u> at these periods. This does not include the scheduling information that provides the <u>mandatory</u> maintenance and the corresponding <u>mandatory</u> periods to perform such maintenance.	It is proposed to modify this paragraph to read: “As part of the compliance with CS 2X.1529 (Instructions for Continued Airworthiness (ICA) – §(b)(1) Scheduling Information), the manufacturer may use a Maintenance Review Board (MRB) process or a Maintenance Type Board (MTB) process in order to develop or revise the initial minimum recommended scheduled maintenance requirements for a for derivative or newly type certified aircraft (Aeroplanes and Rotorcrafts) or STC products.”	NO	YES	Agreed	The sentence has been modified as follows: “initial minimum recommended scheduled maintenance/inspection requirements”
4	Airbus	§1.1.	3/16	The third sentence of this paragraph introduces the concept of the ‘Manufacturer Scheduled Maintenance Requirements’. It incorrectly suggests that this can be called the MRB/MTB Report. The manufacturer’s SMR includes more than what is published in the MRB/MTB Report. ALI/CMR/FAL scheduled maintenance requirements are issued by the Manufacturer in addition to those developed under the MRB Process	It is proposed to modify this paragraph to read: The Manufacturer Scheduled Maintenance Requirements established using the MRB/MTB Process are published...’	NO	YES	Agreed	The paragraph has been modified as suggested.
5	Airbus	§1.1.	3/16	The third sentence of this paragraph suggests that ‘any other manufacturer’s title’ may be used for the Report that publishes the tasks developed from the MRB/MTB Process. This could suggest that the MRB/MTB Process has not been followed and therefore may lead to confusion in the field with other documents which have been established using other processes. It is suggested that if the MRB/MTB Process has been used then the document shall be titled MRB/MTB Report.	It is proposed to modify this paragraph to read: Can be called: Maintenance Review Board Report (MRBR) or Maintenance Type Board Report (MTBR) or any other manufacturer’s title.	NO	YES	Agreed	The paragraph has been modified as suggested.
6	Airbus	§1.1.	3/16	The note in this paragraph refers to the ‘BASA’. This abbreviation is normally understood to refer to “Bilateral <u>Aviation</u> Safety Agreements”.	Correct the definition to read ‘Aviation’ instead of ‘Air’	NO	YES	Agreed	The BASA definition has been corrected in the complete document.

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7	Airbus	§1.1.	3/16	The abbreviation TIP at the end of the note should be written in full as it is the first use of this in the document.	It is proposed to modify this paragraph to read: ‘...as per the Technical Implementation Procedure (TIP).	NO	YES	Agreed	The paragraph has been modified as suggested.
8	Airbus	§1.3	4/16	Some abbreviations used in the CM do not appear in the list. Examples are BASA, CA, VA, RA. Some that <u>are</u> listed are not included in the current version of the document. A final check before publication is recommended. The abbreviation ‘DI’ for Detailed Inspection should read ‘DI/DET’ to be in line with Industry standards and MSG-3. However, it may not be used in the CM and could thus be removed completely. The abbreviation ‘IMPS’ is not needed at the end of the explanation of the abbreviation	Review and correct paragraph immediately prior to issuance.	YES	NO	Agreed	Abbreviations have been corrected as suggested.
9	Airbus	§2	6/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: “The process of developing aircraft maintenance programmes for new aircraft and powerplants has evolved from one in which each operator proposed its own unique programme, to one in which the regulatory authorities and industry work together to develop the initial minimum recommended scheduled maintenance/inspection requirements for aircraft and/or powerplants, used as a basis for the operators’ AMP.”	NO	YES	Agreed	The sentence has been modified as follows: “initial minimum recommended scheduled maintenance/inspection requirements”

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10	Airbus	§2	6/16	<p>The first paragraph contains the first example of a possible conflict in understanding which also appears in later paragraphs. The ‘aircraft’ that receives a Type Certificate includes its powerplants. The MRB/MTB Report must address the aircraft, including its powerplants. It is thus questioned why this paragraph includes the word ‘and/or’ between aircraft and powerplants.</p> <p>Only the Aircraft TCH produces an MRBR/MTBR. Powerplant TCHs may use MSG-3 to develop tasks (in conjunction with the Aircraft TCH) but they do not follow the MRB/MTB Process and a MRBR/MTBR is never produced just for the powerplant.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>‘..requirements for aircraft and / or (including powerplants), used as a basis..</p>	NO	YES	Agreed	The paragraph has been modified as suggested.
11	Airbus	§2	6/16	<p>Several references are made to MSG-1. The original document was simply titled ‘MSG’.</p>	<p>Replace MSG-1 by MSG in three places in this paragraph</p>	NO	YES	Agreed	MSG-1 has been replaced with MSG.
12	Airbus	§2	6/16	<p>In sixth line of second paragraph there is a second use of ‘aircraft and its powerplants’.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>..for the Boeing 747 aircraft (including and its powerplants). Or, alternatively just write ‘..for the Boeing 747.</p>	NO	YES	Agreed	The paragraph has been modified to read:”for the Boeing 747 aircraft (including its powerplants).”
13	Airbus	§2	6/16	<p>In the last line of paragraph 2 it is again written ‘type-certificated aircraft and/or powerplants’. An ‘aircraft’ includes its powerplants. A ‘universal document’ will never be produced at the level of the MSG output for just the powerplant analyses. Thus the word ‘or’ is incorrect.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>‘...newly type-certificated aircraft and / or (including their powerplants). Or, alternatively, just write ‘newly type-certificated aircraft’.</p>	NO	YES	Agreed	The paragraph has been modified to read:”(including its powerplants).”
14	Airbus	§2	6/16	<p>Proposed wording improvement</p>	<p>It is proposed to modify this paragraph to read:</p> <p>‘..and analysis procedure contained which was published in a new document...</p>	NO	YES	Agreed	The paragraph has been modified as suggested.

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15	Airbus	§2	6/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: “Early experience in the development of initial recommended scheduled maintenance/inspection requirements revealed that a programme of effective recommended maintenance tasks could be developed through the use of logical analysis and decision processes. [...]”	NO	YES	Agreed	The paragraph has been modified as suggested.
16	Airbus	§3	6/16	The use of the word ‘today’s’ in the first sentence suggests that EASA may not recognise the use of MSG-3 for tomorrow’s aircraft. It is suggested that if/when EASA consider that MSG-3 is no longer an appropriate tool then a revision of the CM will be required anyway. Aircraft includes powerplant and thus powerplant does not need to be identified separately. If emphasis is required then write ‘including powerplant’.	It is proposed to modify this paragraph to read: The EASA recognizes MSG-3 as an appropriate methodology for the development of for today’s aircraft and (including powerplant) scheduled maintenance requirements.	NO	YES	Agreed	The paragraph has been modified as suggested.
17	Airbus	§3	6/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: “The EASA recognizes MSG-3 for today’s aircraft and powerplant recommended scheduled maintenance requirements development.”	NO	YES	Agreed	The sentence has been modified as follows: “initial minimum recommended scheduled maintenance/inspection requirements”
18	Airbus	§3	6/16	We question the validity of the word ‘always’ in sentence beginning ‘Since 2003’. This does not provide for exceptional situations where an older revision may be accepted in order to avoid conflicting policies within the same MRB Report. E. g. when a new series or model is added to an existing Type Certificate changes to existing MSG-3 dossiers (not new ones) may be permitted to follow earlier revisions.	It is proposed to modify this paragraph to read: The applicant is expected to use the latest revision of the MSG-3 published at date of the application for TC/STC to the CA authority. Deviations may be agreed at program level in order to maintain a consistent set of requirements.	NO	YES	Agreed	The paragraph has been modified as follows: “Since 2003, EASA has been involved in the IMRBPB developing the MSG-3 revisions. The applicant should always use the latest revision of the MSG-3 published at the date of the application for new TC/STC to the CA authority. Deviations may be agreed at program level in order to maintain a consistent set of requirements. E. g. when a new series or model is added to an existing Type Certificate changes to existing MSG-3 dossiers (not new ones) may be permitted to follow earlier MSG-3 revisions. ”

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19	Airbus	§4	7/16	The IMRBPB comprises regulatory members only. MPIG (Industry) personnel are not IMRBPB members. The word 'but' is not appropriate. The need to identify who chairs the IMRBPB is unclear. If desired, it could be stated that the Chair is elected from among the IMRBPB members. Refer to IMPS §2.2 for clarification.	It is proposed to modify this paragraph to read: The IMRBPB is chaired by comprises member Regulatory Authorities but the with Industry (MPIG & RMPIG) being invited to contribute to the activities of that forum	NO	YES	Agreed	The paragraph has been modified as suggested.
20	Airbus	§4	7/16	Word 'meetings' is missing after IMRBPB. Note that as an alternative, it may be better to write '...discussed by the IMRBPB.' Improvement of wording suggested to avoid 'brings about'.	It is proposed to modify this paragraph to read: '...which are discussed during the IMRBPB meetings . When accepted, the CIP becomes an Issue Paper (IP) which brings about typically leads to an amendment to...'	NO	YES	Agreed	The paragraph has been modified as suggested.
21	Airbus	§5	7/16	It would be useful to write that the IMPS is <u>owned</u> and issued by the IMRBPB. No need to write IMRBPB in full as this was done in para 4.	It is proposed to modify this paragraph to read: The IMPS is owned and issued by the International MRB Policy Board (IMRBPB) .	NO	YES	Agreed	The paragraph has been modified as suggested.
22	Airbus	§5	7/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: "This <u>Certification Memorandum in conjunction with the IMPS</u> provide guidance that may be used by the industry for the development and revision of the initial minimum recommended scheduled maintenance requirements for derivative or newly type-certificated aircraft or STC product during compliance demonstration to Certification Specification CS XX.1529 through the MRB or MTB process."	NO	YES	Agreed	The sentence has been modified as follows: "initial minimum recommended scheduled maintenance/inspection requirements"

23	Airbus	§5	7/16	<p>Airbus does not agree with the paragraph beginning ‘In addition, EASA policy is...’.MPIG reached agreement with the IMRBPB that IPs may be voluntarily observed by the applicant but will not be required to be observed until either the IMPS is revised or the NAA introduces the IP content in its MRB Process document (CM-MRB-001 for EASA).</p> <p>EASA should note that MPIG agreement to PB request to go from 2 yr to 3 yr revision cycle included the following wording:</p> <p><i>MPIG has no objection to this request provided that, as already suggested, it will be clarified that Issue Papers will be published in the year of their agreement and will contain a statement that their content may be considered by the MRB applicant as equivalent to a Temporary Revision to either the MSG-3 document or IMPS. The delay in publication of the formal document should then have no bearing on the use of the Issue Paper result in an applicant’s maintenance program development activities. The word ‘may’ is important since <u>it should always be an applicant’s decision on whether or not to comply with an Issue Paper that has not yet been incorporated within the NAA’s regulatory documentation.</u></i></p> <p>EASA is requested to open dialogue with other IMRBPB members to determine level of support for this proposal. A change could then be proposed to the IMPS which, even if unwanted by Industry, would at least lead to a level playing field.</p> <p>The wording ‘unless clearly stated otherwise in this certification memorandum or in another EASA document’ is not helpful. At time of IP publication there is no possibility that an EASA document already states that the IP content does not need to be considered. EASA documentation would need to be revised (immediately) to state this. If EASA is able and willing to update documentation in this fashion then Industry suggests that the current IMPS policy is appropriate as it allows the NAA to require early consideration of the IP by including</p>	<p>It is proposed to delete the following paragraph:</p> <p>In addition, EASA policy is to consider all issued IPs as applicable and part of EASA policies, unless clearly stated otherwise in the certification memorandum or in another EASA document</p>	NO	YES	Not Agreed	EASA policy is to consider all agreed and closed IPs as applicable and part of EASA policies. For an existing MRBR, unless retroactivity is clearly highlighted in the IP, implementation of subsequent IPs can be done on a voluntary basis.
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				the requirement in their regulatory material.					
24	Airbus	§5	8/16	Sentence beginning ‘But, at a minimum.....’ to be reworded to address conflict between the word ‘will’ and ‘as necessary’. A sentence should not begin with the word ‘But’.	It is proposed to modify this paragraph to read: But, At a minimum, each revision of the IMPS will is likely to trigger a revision of this certification memorandum as necessary .	NO	YES	Agreed	The paragraph has been modified as suggested.
25	Airbus	§5.1.1.1.	8/16	<p>There is an incompatibility between:</p> <ul style="list-style-type: none"> “[...] an acceptable means of compliance to develop <u>Manufacturer</u> Scheduled Maintenance Requirements”, and “As part of the compliance with [...] part M.A. 301 and 302, [...]”. <p>Manufacturers (/holders of a design approval) are not required to comply with Regulation (EU) No 1321/2014 (incl. Part-M) but with Regulation (EU) No 748/2012 (Part-21).</p> <p>It is believed that there is no need to refer to point M.A.301 (i.e. how the aircraft continuing airworthiness and the serviceability of both operational and emergency equipment shall be ensured). Reference to M.A.302 would be enough (i.e. development/revision of the AMP) if the intent is to keep in this discussion some organisations (i.e. CAMOs) that do not necessarily hold a design approval.</p> <p>Airbus proposes to use lower case letters to avoid an interpretation that all the manufacturer scheduled maintenance requirements will be developed by use of the MRB/MTB process.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>“As part of the compliance with CS 2x.1529 Appendix A, G and H paragraph 2X.3(b)(1) and part M.A. 301 and 302, the MRB/MTB process (with MSG-3 as a tool) is used as an acceptable means of compliance to develop Mmmanufacturer recommended Sscheduled Mmmaintenance Rrequirements supporting the objectives of an efficient aircraft maintenance programme.”</p>	NO	YES	Agreed	The paragraph has been modified as suggested.
26	Airbus	§5.1.1.2.	8/16	The first sentence of this paragraph refers to the abbreviation ‘BASA’. This normally stands for “Bilateral <u>Aviation</u> Safety Agreements”.	Correct the definition to read ‘ <u>Aviation</u> ’ instead of ‘Air’	NO	YES	Agreed	The paragraph has been modified as suggested.

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27	Airbus	§5.1.1.2.	8/16	<p>The term ‘Manufacturer Scheduled Maintenance Requirements Report’ should not be used in place of MRB Report / MTB Report. A MSMR Report would be expected to include all manufacturer scheduled maintenance requirements whereas the output from application of the MRB Process does not include ALIs, CMRs, FAL etc.</p> <p>Airbus would be prepared to open discussion on a change to Appendix H that requires the TCH to develop a single document/repository that contains all scheduled maintenance requirements that are declared as ICAs. This could be called the MSMR report / repository. The content would include requirements coming from application of the MRB Process plus requirements from ALS. The concept of the MRB Report could then be eliminated. This would require international harmonisation and it is not appropriate to introduce this concept with this CM.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>...seeking an EASA approval of their Manufacturer Scheduled Maintenance Requirements MRB Report or MTB Report should contact the EASA MRB section for coordination.</p>	NO	YES	Agreed	The paragraph has been modified as suggested.
28	Airbus	§5.1.1.2.	8/16	<p>If EASA does not accept Airbus proposal to delete §5. text that reads ‘<i>In addition, EASA policy is to consider all issued IPs as applicable and part of EASA policies, unless clearly stated otherwise in the certification memorandum or in another EASA document</i>’, it would be advisable to add a statement in §5.1.1.2 to highlight EASA expectation that the foreign applicant will have to observe EASA expectation to comply with issued IPs in the same way that European TCHs would have to.</p>	<p>No action required if §5 text starting ‘In addition..’ is removed. If it is not removed then consider adding the following sentence in paragraph 3 of 5.1.1.2:</p> <p>This applicant’s proposal shall reflect the EASA policy that all issued IPs are considered applicable and part of EASA policies</p>	NO	YES	Not Agreed	EASA expectation is that the foreign applicants comply with issued IPs in the same way that European TCHs would have to but in the end this is under the responsibility of the CA.

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29	Airbus	§5.2	8/16	Application of the MRB/MTB process results in MRB/MTB data that is included in an MRB or MTB Report. It might also be put in a Manufacturer Scheduled Maintenance Requirements report (together with other requirements) but that is a TCH decision. The STC applicant may implement an MTB process if the recommended (i.e. non mandatory) scheduled maintenance requirements of the basic aircraft were developed using the MRB / MTB process explained in EASA's CM-MRB-001.	It is proposed to modify this paragraph to read: 'When Manufacturer Scheduled Maintenance Requirements of the manufacturer's recommended scheduled maintenance requirements for the basic aircraft have been developed using the MRB/MTB process....'	NO	YES	Agreed	The paragraph has been modified as suggested.
30	Airbus	§5.2	9/16	Text states 'In other cases, another acceptable process should be followed'. No indication is given to whom it must be acceptable.	It is proposed to modify this sentence to read: In other cases, an alternative process acceptable to EASA other acceptable process should be followed'	NO	YES	Agreed	The paragraph has been modified as suggested.
31	Airbus	§5.2.	8-9/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: Considering the above criteria, the STC applicant will make a proposal to the PCM for the development of the recommended scheduled maintenance requirements. [...]."	NO	YES	Agreed	The paragraph has been modified as suggested.

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32	Airbus	§5.3.	10/16	<p>The inclusion of ‘other Manufacturer Scheduled Maintenance Requirements Report’ is not appropriate. The CM refers specifically to the MRB/MTB Process, not other processes a TCH might follow to satisfy Appendix H. A ‘MSMR Report’ will include tasks not derived from application of the MRB/MTB Process, e.g. ALI, CMR, FAL requirements. It is also highlighted that the title of the paragraph refers only to MRBR / MTBR which further supports the point that a MSMR is a different type of document and not an output of application of the MRB/MTB Process</p> <p>The CM is not the appropriate document to advise the use of EASA Form 40 to approve scheduled maintenance requirements not derived from application of the MRB/MTB Process.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>Note 1: Application.....Maintenance Type Board Report (MTBR) or other Manufacturer Scheduled Maintenance Requirements Report, Supplement and revisions thereto’.</p>	NO	YES	Not Agreed	The EASA Form 40 is used for Applications related to the EASA support for Approval of Maintenance Review Board Report (MRBR), Maintenance Type Board Report (MTBR) or other Manufacturer Scheduled Maintenance Requirements Report, Supplement and revisions thereto.
33	Airbus	§5.3.	10/16	<p><u>MRB Report approval</u>. 1. According to IMPS para 4.6.1 it is the TCH that formally submits the MRBR proposal to the MRB Chairperson, not the ISC Chairperson.</p> <p>The MRB Chairperson is expected to receive, review and, as necessary, consolidate comments from MRB team members before sending MRB comments to the applicant. Members should not send comments directly to the TCH due to risk of conflict</p>	<p>It is proposed to modify this paragraph to read:</p> <p>Upon receipt of the MRBR proposal from the ISC Chairperson, the EASA MRB Chairman confirms its reception and invites the MRB team Members to review the MRBR proposal and then send comments to the MRB Chairman. After review and any necessary conflict resolution, a consolidated set of MRB comments is sent to the applicant</p>	NO	YES	Agreed	<p>The sentence has been modified as follows:</p> <p>“Upon receipt of the MRBR proposal from the TCH, the EASA MRB Chairperson confirms its reception and invites the MRB Team members to review the MRBR proposal and then send comments to the MRB Chairperson. After review and any necessary conflict resolution, a consolidated set of MRB comments is sent to the applicant.”</p>

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34	Airbus	§5.3.	10/16	The section “MRB Report approval” refers inappropriately to Regulation (ECU) No 1321/2014 and Part-M. The approval letter should be issued in accordance with Regulation (EU) No 748/2012, Part-21 (design), as part of the compliance with CS 2x.1529 Appendix A, G and H paragraph 2X.3(b)(1).	It is proposed to modify this paragraph to read: “ MRB Report approval 1. [...] In accordance with Commission Regulation (ECU) No. 748/2012 1321/2014 , Part- 21 M , the EASA MRB Section will issue the EASA ‘Approval Letter of the MRBR’ following submission of the Statement of Technical Satisfaction and associated checklists from the EASA MRB Chairperson. [...]”	NO	YES	Agreed	The reference has been removed based on other received comments.
35	Airbus	§5.3.	10/16	<u>MRB Report approval</u> 2. MRBR approval letters are addressed in IMPS §4.6.8. It is questioned why EASA does not accept that wording. The CM is supposed to identify the delta between the EASA MRB/MTB process and the IMPS. The first Note states that the approval letter normally only covers the main body of the Report. Airbus challenge this statement since no Airbus MRBR would be declared ‘normal’. It is agreed that Appendices to be approved should be identified in the approval letter but this is already stated in the IMPS. The IMPS also requires that if a CMR appendix is included then the approval letter must state that it is <u>not</u> covered by the approval letter. The second Note provides the TCH with an option not to include the approval letter in the MRB Report. This is not in line with the IMPS which states that ‘Approval letters of all signing authorities shall be included within the envelope of the published MRBR’. This was agreed by the IMRBPB (including EASA) in IP153 in April 2015.	It is suggested that EASA only include requirements that differ from those in the IMPS. If EASA wish to revisit the agreement made in IP153 then this should be brought to IMRBPB attention. Airbus supports the proposed wording of the second Note but believe that it is more appropriate to include this in the FAA MRB/MTB Process since, under bilateral agreements, non-European TCHs may not refer to the EASA CM.	YES	NO	Agreed	Both Notes have been removed.

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36	Airbus	§5.3.	10/16	Paragraph beginning ‘It may be necessary...’ states that an appendix to the MRB Report is to be used to reflect regulatory differences. IMPS §5.15 states that a dedicated section (or appendix) may be used. Since Airbus policy is to use a dedicated Section for US requirements we ask that the practice is identified as acceptable to EASA	It is proposed to modify this paragraph to read: When this condition exists, a section or appendix to within the MRB Report is used to list these differences, each this being approved only by the respective regulatory authority	NO	YES	Agreed	The paragraph has been modified as suggested.
37	Airbus	§5.3.	10/16	The last sentence on the page refers to the MSMR Report. This should not be confused with the MRB Report or the MTB Report. Airbus acknowledges that EASA intend to identify Apx H 25.3b compliance documentation on their website irrespective of whether the TCH followed a MRB/MTB Process or not. Reference to MSMR may lead to an inconsistent set of documents since the MSMR of some TCH will include all scheduled requirements and not only those coming from MRB/MTB Process.	It is proposed to modify this paragraph to read: The EASA MRB Section will maintain a register on the EASA website of EASA MRB Section approved Manufacturer Scheduled Maintenance Requirements Report documents that contain the manufacturer’s recommended scheduled maintenance requirements on the EASA website.	NO	YES	Agreed	The paragraph has been modified as suggested.
38	Airbus	§5.5	11/16	The sentence ‘In case the MRB R is not approved at TC...’, it is the <u>use</u> of the MRB Process (or application of the MRB Process) which forms part of the compliance.	It is proposed to modify this paragraph to read: In case the MRB R is not approved at TC, it is the use of the MRB process which forms part of the compliance to the applicable Certification Specification’	NO	YES	Agreed	The paragraph has been modified as suggested.
39	Airbus	§5.5.	11/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: “In addition, before EIS, the applicant shall perform a review of all modifications embodied and not covered in the MRBR Draft as submitted and the resulting impact analysis should be presented to the ISC/MRB to ensure that the approved MRBR will represent the minimum initial recommended scheduled maintenance required at the aircraft delivery or at the first issue of the certificate of airworthiness, whichever occurs later.”	NO	YES	Agreed	The sentence has been modified as follows: “initial minimum recommended scheduled maintenance/inspection requirements”

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40	Airbus	§5.6.4	12/16	The delta with the IMPS relates to the second sentence. This provides additional flexibility compared to the IMPS 'recommended to happen 30 calendar days prior to the beginning of the applicable WG meeting' and is accepted. However, the reference to SSI and LHSI is missing which is assumed to be an error.	It is proposed to modify this paragraph to read: This is recommended to happen early enough in the process to prevent the ISC to reject the MSI/ LHSI/SSI reviewed by the WG.	NO	YES	Agreed	The paragraph has been modified as suggested.
41	Airbus	§5.6.6	12/16	The last sentence states that the 90 day period will start when the complete package is received. This implies that agreement cannot be reached with the MRB to accept late inputs without causing the 90 day clock to be restarted. This is not in the interests of Industry goal to deliver ICAs in a timely fashion.	It is proposed to modify this paragraph to read: In some cases, it might be acceptable that only a partial package of work is released but this must be agreed by the MRB Chairperson. and The clock for the 90 day approval period will start when the complete package is received unless agreed otherwise by the MRB Chairperson	NO	YES	Agreed	The paragraph has been modified as suggested.
42	Airbus	§5.6.7.8	13/16	The IMRBPB and MPIG reached agreement that it is not justified to monitor changes to the MMEL after the initial MRB Report has been approved. To clarify this we suggest a minor change to the wording.	It is proposed to modify this paragraph to read: The PPH should request that all assumptions made during the development of the first issue of the MRBR are documented and regularly monitored for impact assessment...	NO	YES	Not agreed	This paragraph addresses all assumptions (not just the MMEL) that need to be documented and regularly monitored for impact assessment.
43	Airbus	§5.6.7.9	13/16	EASA AMC 25.19 concerning CMRs includes an Appendix 3 in which example 2 shows a means to comply with the EASA requirement by using an identifier on an MRBR task that fully satisfies a Candidate CMR. It is questioned whether this would be permitted with the language proposed for para 9.	It is proposed to modify this paragraph to read: Except as permitted in EASA regulatory material (e.g. AMC 25-19) a Any references to Certification aspects.....	NO	YES	Agreed	The paragraph has been modified as suggested.

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44	Airbus	§5.6.7.10	13/16	The Aircraft TCH is responsible for application of the MRB Process and will identify responsibilities of Partners, Suppliers & Vendors. The Engine manufacturer will gain a Part 33 Type Certificate and may also be considered as a TCH. However, the Engine TCH will never apply the MRB Process and develop an MRB/MTB Report. The Aircraft TCH will work with the Engine TCH and include their responsibilities in the PPH. These will include the supply of MSG-3 data related to the engine MSIs.	It is proposed to modify this paragraph to read: However, from the RA perspective, only the Aircraft TCH is responsible for the MRB process and its related MSG-3 data.	NO	YES	Agreed	The paragraph has been modified as suggested.
45	Airbus	§5.6.8.3	14/16	EASA make reference to 'A-check', 'Weekly' and 'Daily' which correspond to the names of check packages rather than task intervals. This is valid for an operator's AMP but MRBR tasks are expected to be quoted with a dedicated interval. The value may indeed be compatible with an operator's check package but should be quoted in terms of usage parameter.	It is proposed to modify this paragraph to read: Maintenance tasks and task intervals arising from MSG-3 analysis may and do, in some cases, have a shorter interval than an operator's typical 'A-check' such as like, "Weekly" or "Daily" "7 days or 24 hrs elapsed.	NO	YES	Agreed	The paragraph has been modified as suggested.

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46	Airbus	§5.6.8.	14/16	To make the difference between the EASA and the EASA Member State competent authorities.	<p>It is proposed to modify this paragraph to read:</p> <p>“4. General principles for the use of the MRBR</p> <p>The following principles should be applied to the MRB Report:</p> <p>a. If there is an optimization procedure contained in the MRB Report, the following rule applies: “The individual check intervals listed in this Report may be optimized by the operator following the completion of the required series or sequence of checks and the satisfactory review of check results and approval by the responsible EASA Member State competent authority, or in accordance with the operator's NAA approved reliability programme. Individual task intervals may be optimized based on satisfactory substantiation by the operator, and review and approval by his responsible EASA Member State competent authority, or in accordance with the operator's EASA Member State competent authority - approved reliability programme.”</p>	YES	NO	Agreed (partially)	The paragraph has been modified taking into account other comments.
47	Airbus	§5.6.8.4f	14/16	<p>The need for this paragraph is questioned. IMPS §9.0 identifies the need for a Periodic Review in which the ISC Chairperson, Co-Chairperson and MRB Chairperson determine on an approximately annual basis whether changes are required to address any of 18 identified issues, several of these referring to in-service experience.</p> <p>The value of including the sentence in each MRB Report is unclear. If a sentence is required then it could be limited to that proposed.</p>	<p>It is proposed that paragraph f can be deleted.</p> <p>After the accumulation of industry experience, the ISC or MRB Chairperson may request changes to the requirements of this MRB Report</p> <p>If a sentence is needed in the MRBR it could simply state:</p> <p>This MRB Report is a living document and is periodically updated to reflect design changes and in-service experience</p>	NO	YES	Agreed	The proposed sentence has been added.

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48	Airbus	§5.6.8.5b	14/16	For consistency with comment 3.	It is proposed to modify this paragraph to read: “5. Systems / Powerplant Section The following are recommended principles of the System and Powerplant section of the MRB Report: [...] b. MSG3 (specify the revision) logic was used to develop systems and powerplant recommended scheduled maintenance requirements. This process does not”	NO	YES	Agreed	The sentence has been modified as follows: “initial minimum recommended scheduled maintenance/inspection requirements”
49	Airbus	§5.6.8.5b	14/16	The recommended principles are those relating to the MRB Report tasks. It should thus be clarified that the reference to ‘off-aircraft detailed procedures’ relates to MRB Report off-aircraft tasks that require shop activity to be performed on a component. Para b does not address off-aircraft procedures required for any other reason.	It is proposed to modify this paragraph to read: MSG-3 derived tasks requiring Off-aircraft detailed procedures are controlled....	NO	YES	Agreed	The paragraph has been modified as suggested.
50	Airbus	§5.6.8.6a	15/16	The CM should not limit the selection of the interval usage parameter. This level of detail does not need to be included. While correct in principle, there are occasions where it may be justified that a calendar task is acceptable to address a fatigue issue. The CM should not be worded in such a way that this scenario cannot be discussed with the MRB. Furthermore, depending on the way TCHs address aircraft range, fatigue task thresholds and intervals may have a FH value in addition to FC value. The CM should not suggest that FC is the only valid parameter for a fatigue related task.	It is proposed to limit this paragraph to the first sentence: a. The Structure program is designed to detect and prevent structural degradation due to environmental deterioration (corrosion, stress corrosion), accidental damage and fatigue throughout the life of the aircraft. Some forms of environmental deterioration are age related; therefore, inspections for this type of deterioration are controlled by calendar intervals. Some other forms of damages, such as fatigue are usage dependent; therefore the related inspection intervals are based on Flight Cycles.	NO	YES	Agreed	The sentence has been removed as suggested.

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51	Airbus	§5.6.8.6b	15/16	For consistency with comment 3. The MRBR does not contain mandatory requirements and hence the use of 'shall' is too strong. The word 'should' better fits the recommended nature of MRB Report requirements.	It is proposed to modify this paragraph to read: <u>"6. Structure Section</u> [...] b. The following are recommended principles of the Structure section of the MRB Report: "All aircraft in an operator's or group of operator's fleet shall should be subject to the provisions of this Report. These requirements include external and internal inspections, structural sampling and age-exploration programmes, corrosion prevention and control programmes, and additional supplemental structural inspections that may be required for fatigue-related items."."	NO	YES	Agreed	The paragraph has been modified as suggested

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52	Airbus	§5.6.8.7a	15/16	<p>It is incorrect to state that ‘The Zonal Inspections Section should also permit appropriate attention to be given to electrical wiring installations and to identify applicable and effective tasks to minimise contamination’. This is a valid statement when referring to the Zonal section of MSG-3 but not the Zonal section of the MRB Report. If more than a Zonal GVI is justified by the EZAP analysis then the selected standalone GVI, DET or RST (cleaning) tasks will be put in the Systems section of the MRB Report. No <u>specific</u> attention is to be given to EWIS inspected in Zonal tasks.</p> <p>It is not appropriate to write that ‘An enhanced zonal analysis should be performed for zones that contain both electrical wiring and have a potential for combustible materials being present. This is MSG-3 logic and though it might be appropriate to emphasise it in the PPH there is no justification to include it in the MRB Report.</p> <p>Does EASA wish to state in the MRBR that the Zonal tasks have been developed through application of the MSG-3 logic that includes an enhanced zonal analysis procedure that allows appropriate attention to be given to electrical wiring installations in order to identify any need for standalone inspections and cleaning tasks?</p>	<p>It is proposed to delete the following two sentences:</p> <p>The Zonal Inspections Section should also permit appropriate attention to be given to electrical wiring installations and to identify applicable and effective tasks to minimise contamination. An enhanced zonal analysis should be performed for zones that contain both electrical wiring and have a potential for combustible materials being present</p> <p>If EASA wish to mention the EZAP in the MRB Report then the following sentences are suggested:</p> <p>The Zonal Inspections Section identifies zonal inspections that have been developed through application of the MSG-3 logic. This logic includes an enhanced zonal analysis procedure that allows appropriate attention to be given to electrical wiring installations in order to identify any need for standalone inspections and cleaning tasks.</p>	NO	YES	Agreed	The paragraph has been modified as suggested.

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53	Airbus	§5.6.8.7b	15/16	The wording of the final paragraph is not in line with that of the other 'recommended principles'. A wording change is proposed.	It is proposed to modify this paragraph to read: The following zones that do not contain system installations or EWIS but receive adequate surveillance from other maintenance or structural inspection tasks are listed (specify where in the MRB Report) . Accordingly, these zones are not specified in the inspection requirements presented in the Zonal Inspection Section. “(Insert listings of the zones not specified in the Zonal Inspections Section.) A list of zones not specified in the Zonal Inspections Section is provided	NO	YES	Agreed	The paragraph has been modified as suggested.
54	Airbus	§5.7.1	15/16	It is understood that the text should refer to 25 calendar days in the same way that it states 30 calendar days. As written, the different way of writing this information could lead the reader to assume the difference is intended and thus 25 working days may be valid.	It is proposed to modify this paragraph to read: ..within twenty five calendar days after	NO	YES	Agreed	The paragraph has been modified as suggested.
55	Airbus	§5.7.2	16/16	The applicant will deliver the MRB Report proposal and its associated supporting documents. There is no need to refer to this as a draft.	It is proposed to modify this paragraph to read: With regard to the MRB R approval.....the MRB R proposal draft and its associated supporting documents.	NO	YES	Agreed	The paragraph has been modified as suggested.

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56	Airbus	§6.	16/16	<p>Operators would expect that a 'Manufacturer Scheduled Maintenance Requirements' report contains all scheduled maintenance requirements. i.e. ALI, CMR, FAL tasks in addition to those derived from MSG-3 (whether or not as part of an MRB/MTB Process or not). The MRB Section would not be expected to approve such a compilation of tasks. The CM-MRB-001 refers only to the MRB/MTB Process. Requirements identified through application of these processes are put in an MRB/MTB Report. If MSG-3 is used under any other process the document will have another title but this will only be 'Manufacturer Scheduled Maintenance Requirements' if it includes the ALI, CMR, FAL tasks as well.</p> <p>If the scope of the CM is to be extended to address the use of MSG-3 outside the MRB/MTB process then an alternative proposal is suggested.</p>	<p>It is proposed to modify this paragraph to read:</p> <p>All people.....leading to development of a MRB/MTB Report "Manufacturer Scheduled Maintenance Requirements report" to be approved by the EASA MRB Section.</p> <p>Alternatively:</p> <p>All people.....leading to development of a report "Manufacturer Scheduled Maintenance Requirements report" containing the requirements derived from application of MSG-3 logic that is to be approved by the EASA MRB Section.</p>	NO	YES	Agreed	The paragraph has been modified as suggested.
57	Bombardier Aerospace Maintenance Engineering	5.6.8.4b	14	<p>We have some reserve regarding the following sentence in section 5.6.8.4b:</p> <p><i>'The MRB Report is the controlling document for this programme (sampling programmes should not be published as a stand-alone document).'</i></p> <p>Some sampling programs are not derived through MSG-3 Process (Ex: Escape slides sampling), some are only applicable to some lead aircraft, not defined in advance (LG sampling), some are discretionary sampling inspections in support of age exploration and MRBR evolution.</p> <p>Most of these Programs are complex and need to be published as standalone documents and controlled by the manufacturer (not operators), therefore cannot be controlled by the MRB report.</p>	Propose to specify that only Sampling programs generated through MSG-3 process need to be controlled by the MRB Report and that for some programs, only the reference to the standalone document need to be included in the MRBR)	NO	YES	Agreed	<p>Paragraph has been updated as follows</p> <p>If there is a sampling programme for the engines, propellers, and/or other aircraft components, the following rule applies:</p> <p>The Report should specify the number of aircraft to be sampled and the respective inspection thresholds.</p> <p>A sampling program needs to be either included in the MRB R or at least a reference to a stand-alone document should be made. In the other cases, a stand-alone document may be referenced in the MRB R.</p> <p>A sampling programme should not be used to select an initial task interval larger than could be justified by application of MSG-3 criteria and available technical data.</p>

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58	Bombardier Aerospace Maintenance Engineering	5.6.8.5a	14	<p>Same concern regarding the following sentence in section 5.6.8.4b: <i>In addition specific stand-alone tasks requirements resulting from the Enhanced Zonal Analysis Procedure (EZAP) and the L/HIRF protection Analysis are shown in ATA Chapter 20 of this section. “</i></p> <p>ATA 20 should be just a suggestion not a requirement. Ex: For C Series Bombardier is not using ATA 20 and has come up with new sections for EWIS and LHIRF.</p>	<p>Suggest to change the sentence as follows: <i>In addition specific stand-alone tasks requirements resulting from the Enhanced Zonal Analysis Procedure (EZAP) and the L/HIRF protection Analysis maybe shown in ATA Chapter 20 of this section. “</i></p>	NO	YES	Agreed	Paragraph has been updated as follows “This section covers all aircraft systems, powerplant and APU. In addition specific stand-alone tasks requirements resulting from the Enhanced Zonal Analysis Procedure (EZAP) and the L/HIRF protection Analysis are typically shown in ATA Chapter 20 of this section.” To be in line with the International MRB/MTB Process Standard (IMPS) issue 0
59	Bombardier Aerospace Maintenance Engineering	5.6.8.5c		<p>Not sure how the STC generated tasks can always be included in the MRBR, as proposed in the following sentence:</p> <p><i>All MSI's identified by the TC/STC-holder have been subjected to the MSG3 analysis; this process has resulted in the identification of maintenance tasks which are contained in this Report</i></p> <p>Tasks generated under STC are under the responsibility of the STC holder and therefore may not automatically be included in the MRBR??</p>	<p>We believe we should propose to remove the word 'STC' in the sentence as Bombardier cannot control STC generated tasks.</p>	NO	YES	Noted	<p>It is not the intent of that paragraph to ask for the publication of STC generated tasks into the MRB R. STC generated tasks are published in a document controlled by the STC Holder.</p> <p>As written in introduction of the document (§1.1), “For clarity purposes, only the term “Maintenance Review Board Report (MRBR)” will be used in this document.” But it does not mean that STC generated tasks are published in the MRB R.</p> <p>However, to avoid any confusion the paragraph has been modified as follows: <i>Maintenance Significant Items (MSI's): the list of MSI should be provided or reference should be given to a separate list. The following rule is recommended: All identified MSI's identified by the TC/STC holder have been subjected to the MSG3 analysis; this process has resulted in the identification of maintenance tasks which are contained in this Report. Those MSI's for which a task was not generated during the analysis are identified as follows:” (Insert MSI listing for which no tasks were identified in order for these MSI to be monitored by an operator's reliability programme in accordance with MSG3).</i></p>
60	Gulfstream	1.1	3	<p>Second paragraph, line 4 has an additional 'for' word that is unnecessary</p>	<p>[...] requirements for a for derivative or newly [...]</p>	YES	NO	Agreed	The additional word 'for' has been deleted.

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61	Gulfstream	5	7	Last paragraph states that the TCH shall consider all IPs which are issued at the date of the first application for TC/STC to the CA authority. The use of the proposition ‘at’ gives a different meaning to the paragraph.	[..]TCH shall consider the valid MSG-3 revision at the time of application for TC/STC to the CA authority, as well as all IPs issued by that date. [..]	YES	NO	Agreed	The sentence has been updated taking also into account also comments received from other TCH as follows: “TCH shall use the latest MSG-3 revision and shall evaluate and incorporate as appropriate all IPs which are issued at the date of the first application for TC/STC to the CA authority. Any IPs issued after first application for TC will not be considered as required.”
62	Gulfstream	5.3	10	In regard to the paragraph detailing that the EASA MRB team will pay specific attention to the efficiency of the process: the use of the words ‘specific attention to’ may be interpreted as this being the most important role of the EASA MRB team. Although this role is important, it shall be considered as important (not more) as other roles. Propose using the same emphasis as other paragraphs.	The EASA MRB team will pay specific attention to also provide comments in regard to the efficiency of the ongoing MRB process. As part of its duties, the EASA MRB team will highlight to the TC/STC applicant unnecessary work or any issues such as lack of quality, late submission of data, among others, which may jeopardize the efficiency of a meeting or of the MRB process. [..]	Yes	No	Agreed	The sentence has been updated as suggested.
63	Gulfstream	5.3	10	MRB Report approval, item (1): IMPS paragraph 4.6.1 does not specify that the MRBR Proposal has to be submitted to the MRB Chairperson by the ISC Chairperson.	Replace ‘ISC Chairperson’ by ‘TCH’ for consistency with IMPS paragraph 4.6.1	Yes	No	Agreed	The sentence has been updated as suggested.
64	Gulfstream	5.3	10	MRB Report approval, item (3): As per the IMPS paragraph 4.6.3, the ISC Co-Chairperson shall be included for flexibility and redundancy.	Add ‘ISC Co-Chairperson’ to ‘ISC Chairperson’.	Yes	No	Agreed	The sentence has been updated as suggested.
65	Gulfstream	5.5	11	On para 4, item (2), editorial: replace ‘clear’ by ‘clearly’	replace ‘clear’ by ‘clearly’	Yes	No	Agreed	The word has been corrected.
66	Gulfstream	5.6.7	13	Item (2) is likely covered by Covered by IMPS 3.5, 4.4.3 and 9.2.	Delete item (2)	Yes	Yes	Disagreed	This point is related to PPH Recommended Content. Although it might be already covered by other points of the IMPS, there is no inconsistency of the contents.
67	Gulfstream	5.6.7	13	Item (3) is likely covered by Covered by IMPS 4.6.9 and 9.2.	Delete item (3)	Yes	Yes	Disagreed	This point is related to PPH Recommended Content. Although it might be already covered by other points of the IMPS, there is no inconsistency of the contents.
68	Gulfstream	5.6.7	13	Item (5) is likely covered by Covered by IMPS 9.2, 3.5 and 4.2.5.	Delete item (5)	Yes	Yes	Disagreed	This point is related to PPH Recommended Content. Although it might be already covered by other points of the IMPS, there is no inconsistency of the contents.

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69	Gulfstream	5.6.7	13	While the utilization assumption should be part of the PPH (covered by IMPS 7.1), other assumptions are part of the MSG-3 analysis itself. The annual review IMPS paragraph 9.2 captures the intent for monitoring those changes.	Delete item (8).	Yes	Yes	Disagreed	This point is related to PPH Recommended Content. The IMPS paragraph 9.2 is the Minimum content of a Periodic Review including changes in the applicability including fleet utilization and type of operation that could affect the utilization assumption stated in the PPH.
70	Gulfstream	5.6.8	14	Paragraph 4, typo for word ‘applies’. Should be ‘applied’.	Replace ‘applies’ by ‘applied’	Yes	No	Agreed	The word has been corrected.
71	Gulfstream	5.6.8	15	Paragraph 6.a, last sentence: <i>‘therefore the related inspection intervals are based on Flight Cycles.’</i> . This might be a general rule, however there could be cases that some structural components be more susceptible to cruise flight loads than landing/takeoff loads. Example: wing structure more susceptible to wing loading cycles for cruise than for high loads during takeoff and landing. Those particular cases could drive to dual interval in FH and FC.	Delete <i>‘therefore the related inspection intervals are based on Flight Cycles.’</i> .	Yes	Yes	Agreed	The sentence has been completely removed.
72	The Boeing Company	1.3	4	Missing Acronyms	Add Acronyms BASA – Bilateral Air Safety Agreements CPCP – Corrosion Prevention and Control Program	Yes	No	Agreed	Acronyms have been added
73	The Boeing Company	5	7	The text states: In addition, EASA policy is to consider all issued IPs as applicable and part of EASA policies, unless clearly stated otherwise in this certification memorandum or in another EASA document. For a new aircraft, in order to develop the related PPH, TCH shall consider all IPs which are issued at the date of the first application for TC/STC to the CA authority.	We suggest changing the text as follows: “... In addition, EASA policy is to consider all agreed and closed Issue Papers (IPs) as applicable and part of EASA policies, unless clearly stated otherwise in this certification memorandum or in another EASA document. For a new aircraft, in order to develop the related PPH, TCH shall consider evaluate and incorporate as appropriate all IPs which are issued at the date of the first application for TC/STC to the CA authority. Any IPs issued after first application for TC will not be considered as required.”	Yes	Yes		This text has been revised in order to also include comments of other TCHs. EASA policy is to consider all agreed and closed IPs as applicable and part of EASA policies. For an existing MRBR, unless retroactivity is clearly highlighted in the IP, implementation of subsequent IPs can be done on a voluntary basis.

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74	The Boeing Company	5.5	11	“... 2. The Applicant shall clear demonstrate that a design change (Configuration) Management is implemented which allows the follow-up of the modifications at least from this design definition on.”	Editorial Change: “... 2. The Applicant shall clearly demonstrate that a design change (Configuration) Management is implemented which allows the follow-up of the modifications at least from this design definition on.”	Yes	No	Agreed	Editorial change has been implemented.