

International Maintenance Review Board Policy Board (IMRBPB)
Issue Paper (IP)

Initial Date: 25 Jan 19

IP Number: CIP IND-2019-01R1

Revision / Date: 02 / 7 Mar 19

Title: Making Tasks Resulting from Path 7 Analysis Optional

Submitter: Lockheed Martin, AeroTechna, SeaTec, Delta Airlines

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

Issue:

Current guidance does not provide sufficient operator to operator flexibility regarding tasks derived from Path 7 (Economic). While the IMPS implies in paragraph 5.15 that tasks resulting from Path 7 may be deleted from an operators maintenance program under the guidance of IP-44, the reality is that some operators may never have sufficient data under the rules of IP-44 or local regulatory guidance to substantiate interval changes or task deletion for an economic task that may not be economically effective to certain operators at any interval.

By definition, Path 7 tasks have no impact on aircraft safety or operational reliability, yet once established as part of the MRBR, are subject to the same constraints for escalation, etc. as all other tasks. In addition, the establishment of the tasks and intervals as part of the working group limits the input to the perspectives that are represented on the WG. In reality, economics are highly dependent on local operator considerations such as:

- Operator Capabilities
- Economies of Scale
- Operating Environment
- Flying Rates

Problem:

Given, the significant differences in the economic considerations among operators, it is not possible for the WG to establish task intervals that consider the economic factors of all operators. In addition, it can easily be true that certain Path 7 tasks may not be economically advantageous for a particular operator at any interval. The ability of the operator to effectively manage their program due to unique economic considerations is inhibited by current MRB process.

Recommendation (including Implementation):

It is proposed that the Industry Steering Committee (ISC) be given the authority to state in the PPH that Path 7 tasks, which are not identified as a CCMR, can be determined by any individual operator to be classified as optional. The PPH statement would allow an AMM maintenance program rule to be placed in the appropriate ICA document.

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Add new paragraph to the IMPS, as below:

IMPS:

IMPS - 4.7.9 (new)

Due to the numerous factors that impact economic considerations (operating environment, location, indigenous capabilities, etc.), Path 7 tasks may be applicable to the world fleet but may not be cost effective for individual operators. The ISC has the authority to state in the PPH that Path 7 task can be determined by any individual operator to be classified as optional without data substantiation. The PPH guidance will allow an AMM maintenance program rule to be placed in the appropriate ICA document.

IMRBPB Position:

Date:

Position:

Status of Issue Paper and date:

Candidate

Recommendation for implementation:

Retroactive: Y

Important Note: The IMRBPB IPs are not policy. An IP only becomes policy when the IP is adopted into the processes of the appropriate National Aviation Authority. However, before formal adoption, the IP content may be incorporated by the MRB applicant on a voluntary basis with the agreement of all parties as detailed in the program PPH.