MPIG Review CIP EASA 2023-04

Clarifications on the policy of "off-wing", overhaul and restoration tasks

May 8-12, 2023

MPIG Reference Material

1. **IP126** Use of Technical Standard Order (TSO) for MSG-3 Analysis (incorporated 2013.1)

2. **IP146** Recording Vendor Recommendations - Task Interval Consistency

3. **MAP 2018-003** MRBR task description for off-wing tasks (MPIG Agreed Position)

4. **FAA Order 8110.54A** Instructions for Continued Airworthiness Responsibilities, Requirements, and Contents

5. **FAA Order 8130.2H CHG 1** Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag

6. **IMPS Issue 02** ; 3.2.9 System Procedural Steps, Task Summary

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The CIP Title –

Clarifications on the policy of <mark>"off-wing",</mark> <mark>overhaul</mark> and <mark>restoration tasks</mark>

*CIP addresses where there is no clear written **policy** related to the relationship management of "off-wing", overhaul, and restoration tasks within the MSG-3 document. Note: IMPS is not addressed.*

- MPIG agrees with the need for clarification in the areas mentioned.

The CIP Issues Statement –

MSG-3 is not giving much information about <mark>consolidation of different tasks</mark> into an <mark>off-aircraft</mark> <mark>restoration</mark> task and identification of the scope of such tasks <mark>as overhaul</mark>.

2-3-7.9: "*This paragraph applies to on-aircraft tasks only. Descriptions for off-aircraft restoration tasks may identify different task types.*"

Glossary: "*That work necessary to return the item to a specific standard.*
Restoration may vary from cleaning or replacement of single parts up to a <mark>complete overhaul</mark>."

Glossary: "*Since Restoration may vary from cleaning or replacement of single parts up to a <mark>complete overhaul</mark>, the <mark>scope of each assigned</mark> restoration task <mark>has to be specified</mark>*"

All three statements are fully correct, however they leave a lot of room for interpretation resulting in several different approaches by different manufacturers, and are often not in line with the according ICA (e.g. CMMs) and maintenance documentation resulting in many issues at operators and their regulatory authorities

The issue statement assumes that one function of MSG-3 is to consolidate tasks into groups that can be identified as "<mark>off-aircraft</mark> restoration tasks", thus meaning overhaul. (ref.2-3-7.9)

- MPIG does not agree this issue is a direct function of MSG-3 to be addressed, as it is a form of task packaging, possibly titled overhaul when controlled by a CMM.

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REF: Chapter 2. Development of Scheduled Maintenance 2-3-7.9.

9. Task Consolidation

Task consolidation is normally not acceptable when establishing the initial scheduled maintenance tasks and intervals. If considered appropriate, it shall be limited to:

- failure finding tasks (OP/OPC and VC/VCK)

- tasks having the same two/three letter code.

If, for technical reasons, tasks of different types (other than OP/OPC and VC/VCK) are required to be performed during the same maintenance event then they shall be linked by a note to this effect against the tasks rather than being consolidated into a single task.

Consolidated tasks may contain tasks derived from one or more analysis dossiers.

In this case, consolidation rules are applicable and appropriate traceability must be implemented.

This paragraph applies to on-aircraft tasks only. Descriptions for off-aircraft restoration tasks may identify different task types.

The CIP Problem Statement –

1. **Restoration tasks that are not restoring-**

   Points out some PPH's automatically characterise any task on a component when removed from an aircraft as a restoration task regardless of the task(s) type being performed. Additionally, relating the TCH ICA CAA compliance recording requirements to TSO component Authorised Release Statement (i.e. FAA 8130-3,EASA Form1,etc.)forms and language.

   MPIG does not have enough information regarding the scope of the problem PPH's referred to directing this unusual method.
   Additionally, the use of the CAA "release statements" is not intended for the recording of TCH MRBR ICAs for regulatory compliance.

The CIP Problem Statement –

2. Overhaul

Points out the word "overhaul" being used within the MSG-3 document is implying that an indirect meaning, is determined by the MSG-3 users. Again the problem reflects on certification documents used for TSO items and their definitions of overhaul for complete conformity are being used.

Additionally, a comparison is being made between TCH ICAs for certification using MSG-3 and CMM standards for TSO approval, which are different in their regulatory objectives, purpose and language.

MPIG agrees the word "overhaul" remaining in the MSG-3 document is creating unintended confusion during MRBR development.

The CIP Problem Statement –

3. **Task procedure preventing Restoration**

    Points out that the CMM used by a vendor may not meet the TCH ICA task summary (i.e., task intent) as required by the MRBR. Meaning the vendor acceptance test procedure (ATP) and functional test procedures (FTP) may not result in restoration of any element. This exemplifies that the vendor's CMM, CAA approved or accepted, may not be appropriate for the TCH ICAs, under the vendors context of overhaul.

    MPIG does not agree that this problem is within the MSG-3 document. (ref. IP126 - Use of Technical Standard Order for MSG-3 Analysis)

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The CIP Problem Statement –

4.   Consolidated VR

Points out that many VR's CMM/maintenance documentation processes consolidate steps which may or may not meet MRBR task intent. Additionally points out there is no process to unbundle consolidated VRs which are imbedded in the vendor's CMM/ maintenance documentation.

MPIG does not agree that the problem is within MSG-3 document.

MSG-3 Glossary: Vendor Recommendation -

Maintenance instructions, including supporting data, provided by the OEM of materials, parts, appliances or components. VR may include for example recommended inspection intervals, periodic maintenance, calibration and testing procedures, installation instructions, or service life. VRs may be contained in various types of source documents such as TSOs and CMMs.

NOTE: Current MSG-3 glossary definition of Vendor Recommendation does not use the word "overhaul"

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The CIP Recommendation/Implementation–

The recommendations as listed under "implementation" are not completely directed to the title, issues and problems 1-4 as stated.

Implementation:

1) MSG-3 Revision 2018.1, Volume 1 – Fixed Wing Aircraft

- Amend the VR statement in Chapter 2-3-2

- Add a note to the L2 Restoration Chapter 2-3-7.5

- Add "Overhaul" to the Glossary (Appendix A)

MPIG does not agree with the 3 items listed as changes to MSG-3 document.

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MPIG Summary

The CIP makes note the there is lack of clarity of the term "off-wing", overhaul and restoration task collectively. The issue statements points to consolidation of different task into "off-aircraft restoration" implying packaging. The issue statement reflects on the usage of the wording "complete overhaul" currently published in MSG-3. The paper goes forward to recommend that the philosophy of "overhaul" be reintroduced into MSG-3 by adding a glossary definition, which we do not agree with.

The problem statement reflects on unique ICA development issues on aircraft platforms related to the classification of parts removed per ICA as restoration task, to include a link to CAA release certificates, while comparing the AMM to the CMM. We do not agree automatic restoration classification is valid, that the CAA maintenance record requirements, nor the comparison between the CMM to the AMM are valid within ICA development under MSG-3 (ref. IP126).

In closing the MPIG position would be not to move forward with this CIP as written. We do see a path forward to improve the MSG-3/MRB process by:

MPIG Summary continued: Recommendations

1.) ***Initiate a CIP*** *to insert the definition "off-wing" (not applicable) or "off-aircraft" (preferred) into MSG-3 and/or IMPS to mean removed for technical access or ease of task compliance.*

2.) ***Initiate a CIP*** *to remove the word overhaul completely from the MSG-3 document, consider IMPS guidance related to Working Group consolidation of tasks.*

3.) ***Establish IMPS guidance*** *related to recording of compliance with MRBR Scheduled maintenance task, when the component is outsourced to a noncontrolled maintenance entity (ref. MAP 2018-003)*

4.) ***Provide more detail*** *to the scope of the problem in this CIP, as the CIP did not reflect on any statistics which may cause the need for MSG-3 adjustment.*

5.) ***Develop a CIP*** *which requires all MRBR task summary detail to be provided by the TCH and controlled by TCH. (i.e., publish detail in TCH ICA or controlled hard hyperlink in TCH ICA)*

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