



Issue Paper (IP)

IP Number: CIP IND 2022-003

Initial Date (DD/MMM/YYYY): 07/DEC/2022

Revision - Date (DD/MMM/YYYY): 07/DEC/2022

Effective Date (DD/MMM/YYYY):

Retroactivity (Y/N): Y

Title:	Periodic review: in-service issues timely assessment
Submitter:	RMPIG

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

Issue:

The periodic review agenda detailed in IMPS par 9.0 requires to consider as inputs to be addressed: “Non-MSG3 derived requirements (e.g. Inspection Service Bulletin) for their potential impact on MSG3 analyses” and “In-service main Issues and potential impact on MRBR”.

Both cases are already managed by TCH/STCHs with the timely review of such situations and the issue of service bulletin as deemed applicable in the frame of the fleet continuous airworthiness surveillance process eventually associated with AD issue by the competent Authorities.

The importance of the above inputs is clear towards their impact to the MSG-3 analysis but can be better specified with respect to the adequate timing when such impact should be considered.

Problem:

Those tasks identified in SBs and/or ADs are required to be complied with as outcome of the in service analysis of occurrences / accidents / incidents happened as managed by the competent bodies between TCH/STCH and AA responsible for the fleet continuous airworthiness.

The investigation associated to these events frequently leads to interim situations where temporary inspection requirements are agreed between the AA and each TCH/STCH in order to monitor some condition in service until a terminating action is identified. When the investigation is ended any interim inspections are removed or - if a new regime of inspection is identified as terminating action - a change of the maintenance plan is implemented by the TCH/STCH.

In most of such cases there is a period of time before the completion of the investigation and the identification of the terminating action where the fleet continuous airworthiness is guarantee by current rules through the SB and/or AD requirements application once embedded into the operator's maintenance programs.

At the same time, it is a matter of fact that some investigations/occurrence resolution can take up to several years to come to a conclusion due to the level and difficulties of the subject under investigation leading to a potential long period of time where precautionary/temporary inspection requirements are kept in service.

In this scenario a too early update of the MSG-3 analysis and MRBR might lead to an inefficient way of working by the ISC and a possible misleading message provided to operators towards the MRBR evolution. The following consideration are proposed:

- An early update of the MRBR tasks might not lead to endorse all the tasks still required by the AD/SB if the latest are not in compliance with MSG-3 logic. This situation is not welcomed since it can create more confusion in service until all the AD prescriptions are in place being the latest one a higher level of mandatory requirements as “equivalent” to ALS tasks.



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- If an MSG-3 analysis / MRBR would be revised earlier than the identification of the final results of an investigation, this might not lead to have an efficient way of working of the ISC which will have to base MSG-3 analysis outcomes on data that have still not arrived to a conclusion and will be likely subject again to further / frequent modifications and updates.
- During the investigation period the airworthiness of the fleet is not under discussion being the additional requirements of the SB and/or AD already in place once endorsed in the operator maintenance programs.

The above situation does also have to consider the fact that when an additional requirement is raised by an Aviation Authority with an AD the additional requirement needs to be endorsed by all the other aviation authorities (whereas a bilateral agreement for immediate mutual recognition does not exist) in order to consider the additional prescription as a mandatory one in service.

Absence of such an endorsement cannot be supposed to be covered through the MRBRs periodic review update process.

For the above reasons a space for clarification has been identified regarding the correct timing for reviewing the MSG-3 analysis and the decision to proceed with an update of the MRBR.

It is suggested to clarify that the above bullets of the IMPS periodic review agenda have to be considered in the frame of the ISC periodic agenda with the intent of reassessing the MSG-3 analysis and (eventually) MRBR only once a terminating action is identified.

Recommendation (including Implementation):

- 1) In section **9 Periodic Review**, sub-section 9.2 add the following sentence at the end of the section:

- ...
- New retroactive airworthiness requirements
- Review of MWGs results
- ...

For those inputs pertaining to in-service issues the update of MSG-3 Analysis should wait until the associated investigation has come to a conclusion, as to its impact towards MSG-3 analysis.

NOTE: The original CIP proposal was submitted by Leonardo Helicopters



International MRB Policy Board

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IMRBPB Position:	
Date:	
Position:	
Recommendation for Implementation:	

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