

IMRBPB Minutes

Central JAA, 18 December 2001

Present: Tom Newcombe, FAA
Dennis Marchant, CAA UK
Torsten Jauernig, LBA
David Pattie, CASA
K C Man, HK CAD
Chris Dammers, MOT Aruba
John Mitchell, TCCA
Cliff Neudorf, TCCA
George White IACA
Tom Llewellyn, JAA

Apologies: John Monk - AECMA
Alan Ferguson CAANZ
Steven Douglas FAA
John Barrass ERA
Joachim Halm Dornier
Jerry Scothern BAe
Richard Anderson ATA
Jan Olsson Europe Airports
Henry Dyck TCCA

CC: Gert Litterscheidt JAA
MRBWG Members JAA
Chao Qun XU CAAC
Claudio Passos CTA

The attached agenda formed the basis for the discussions of the meeting ([Attachment A](#))

IP# IMRBPB

- 052 Issue paper status / control** The control of issue papers (IP's) was discussed. It was agreed that these should be centrally published by JAA who will provide access to the closed IP's via the JAA website including referenced documents and IMRBPB Minutes. To accommodate this, a review of the IP format was carried out and a few enhancements to the original format were agreed. These were:
- A unique number would be allocated to each IP; (JAA will set up a Access Data base to fulfil this)
 - Provision for a originators number would be included as an optional extra;

To accompany the IP's a Index list would be provided which provides status of each IP together with: Date submitted, Unique IP#, Date IP raised and for closed IP's a link to the appropriate IP these being made available on the JAA web site (**Action JAA**).

All IP's were reviewed and status confirmed as listed on the attached index ([Attachment B](#)).

From the review the following points are noted:

IP's 039; 040; 041 and 043, which had been previously added to the list in error, were deleted. FAA confirmed that IP 011 is withdrawn.

Of the remaining IP's a number had implications on MSG3. It is known that ATA had addressed a number of these issues as a result of the recent amendments to MSG3. However, it was felt that we should seek confirmation by ATA of the actions taken or which may be taken in respect of the following IP's:

001; 005; 007; 015; 021; 022; 029; 030; 034; 047; 048: 049: 051 and 052 (**Action ATA are requested to confirm actions taken or that may be taken to address these IP's in order that the IMRBPB can re-consider the status**)

- 008 Flight Crew performing maintenance** Deals with flight crew performing maintenance, it was agreed that the 2nd bullet point in the IMRBPB position block would be reviewed by FAA. That the 3rd bullet point was not applicable as who

performs the maintenance is not a concern of the MRB process but rather the relevant regulatory requirements. A copy of which has been provided and is attached to this IP, the FAA has subsequently confirmed that the letter has been recinded and the associated IP now reflects this. ([Attachment D MRB_10.pdf](#))

The policy of TCA is to be reviewed and published, while the policy of the JAA is to be included in the JAA MRB Handbook. (**Action FAA, TCA & JAA**).

- 010 Check Interval policy** Refers to an attached document which was not on JAA file. A copy of which has now has yet to be located. (**Action ALL**)
- 011 FAA AC 121 – 22 A** This was considered to be an internal matter of the IMRBPB and was withdrawn.
- 014 MRB Report Ownership** Some old MRB documents may still retain the approving NAA logo and this should be deleted from the document.
- 015 MSG 3 analysis of equipment such as ELT's, UWB's, FDR & CVR** ATA specifically requested to clarify their position with regard to bullet 3.
- 025 Corporate aircraft MRB** Was carried forward to the dealt with in conjunction with 045 and was subsequently closed (see also 032 which deals with the same subject & itself is closed).
- 27 FAA Project to develop a generic PPH** Is ongoing with the FAA. (**Action FAA**).
Note: TCCA are willing to assist in this matter.
- 028 Guidelines for JAA/FAA/TCA participation in MRB's** FAA will confirm their current position on draft Notice N8300 KAW referred to on the IP. JAA and TCA policy to be reviewed. (**Action FAA, TCA & JAA**).
- 029 Standard RCM Logic Analysis** Was initially held open to be reviewed in conjunction with 045, subsequently considered that we seek ATA input. (**Action ATA**)
- 032 Applicability of the MRB process** Closed but may impact 025.
- 033 Choice of interval parameters** Status closed but 2nd bullet discounted as already addressed.

Concern was expressed that the possibility of changing an inspection parameter was not well identified. However, FAA AC-121-22A Chapter 6 and JAA Chapter 16 para 23 adequately deal with these issues.
- 035 Suppression of MRB report** We have been advised by the submitter that these proposals are withdrawn. (JAA WG action item list 14/2001 refers).
- 036 Guidelines on Maintenance Programme evolution** Closed as a result of the review of 044.
- 038 MRB Reports and the MPD** The references to JAA-99-002/-003 are incorrect. These will be deleted to be replaced by "the concept of a living MRB report has been recommended and this Issue Paper is considered closed."
- 042 MRB Report Revision** Remains open as T/R policy and procedures although in place have not been implemented.
- 045 Closed**, See 049 & 051

- 049 Standard of RCM logic.** TCA gave a presentation setting out a number of issues which called for some additional issues to be addressed when considering maintenance instruction development process (see attachment C). This was followed by a review of a paper produced by FAA, which made comparisons between the SAE Standard JA/ALL and that of MSG 3.

As a result of the review of the TCA and FAA documents common areas were identified. These are listed as an appendix to IP 049 from which ATA are requested to review the items listed and make their position known to the IMRBPB. As a result of these discussions in conjunction with 051, it was accepted that IP045 could be closed as the subject is covered by this IP 049

During the discussions the work was generally accepted that the IMRBPB does not promote any standard in place of MSG3. Rather it would encourage that MSG 3 continues to be amended to include any relevant material from recognised RCM standards that may become available (SAE JA1011 or IEC 60300 being examples)

PS: During the meeting it was not possible to discuss the draft TCA document “Scheduled Maintenance Instruction Development’ However, the JAA through its MRBWG had reviewed and commented on the document, further review of that document has been requested by those Authorities who attended the IMRBPB meeting.

- 046 RCM/MSG 3 Logic process applicability.** This IP was closed on the basis that the issue is covered by IP’S 049 and 054.

- 044 MRB Check Intervals.** A draft document was submitted by JAA for review and comment. Comment to be sent to Tom Llewellyn by 31st March 2002 [see also 036] **(Action ALL)**

- 047 MSG 3 analysis of emergency equipment.** The IMRBPB confirmed that any emergency and/or safety related item shall be analysed a safety route and it is requested that ATA clarify the the intent of the new glossary for Safety/Emergency Systems & Equipment and that it is not just for evacuation of the aircraft. **(Action ATA)**

Note: the MSG 3 Glossary of Terms page 83 was found to be unclear. It is suggested that it should be reworded to more clearly set out what is intended **(Action ATA)**

- 048 Recognition of evident failure.** The IMRBPB position is that “failures can only be evident if enunciated at the time of the failure otherwise they are to be considered hidden. However, it is recognised that advances in technology result in the “Dark Flight Deck” concept as such ATA are requested to address the issue while taking into account the design concepts of aircraft manufacturers”. **(Action ATA)**

- 051 IMRBPB acceptance of MSG3 revisions.** The current acceptance of recent amendments of MSG 3 is limited to FAA, this is leading to future “dis-harmony” in the standards to be applied.

The IMRBPB consider that this is not the way to proceed and would promote the concept of IMRBPB joint acceptance through the submission of Issue Papers by the ATA

It was noted that a member of the JAA has observed the work of the MPSC and this has proved to be effective. It is therefore proposed that the Authorities of the IMRBPB seek involvement with the ATA MPSC as observers to attempt to prevent the situation where individual airworthiness authorities may not be able to accept amendments to MSG 3.

The Authorities of the IMRBPB should therefore make every effort to ensure that when invited to participate as “observers” in the MPSC that suitable personal are nominated.

- Action 1:** ATA should use IP’s to seek unified acceptance amendments to MSG 3.
- Action 2:** ATA are encouraged to continue to invite the IMRBPB members to participate in the work of the ATA MPSC as observers
- Action 3:** The Authorities of the IMRBPB should when invited to participate, nominate suitable personal to act as observers

However one area of concern was raised which is not meant to detract from the positive progress made by ATA in bringing MSG3 up to date, is regarding that industry may not be able either to establish useful experience or keep pace if revisions are made too frequently.

- 54 Acceptable alternative analysis other than MSG 3.** It was accepted that subject to adequate justification the Authorities may accept any alternative to MSG-3. However, the onus would be on the applicant to demonstrate that their alternative means of compliance results in an equivalent level of safety. Issue paper closed.

As a result of the meeting the following attached Issue Papers were amended and are attached. 008; 025; 038; 046; 044; 047; 048; 051 & 054.

Date of next IMRBPB meeting 10 to 12 September, venue to be decided.

- Attachments
- A: Agenda
 - B: List of previous IP’s
 - C: TCA –Maintenance instruction development presentation
 - D: MRB_10.pdf