

IMRBPB Minutes

Seattle FAA 10-12 September 2002

Present:

B Hawes TCCA
T Newcombe FAA
B Basse FAA
C Neudorf TCCA
D Pattie CASA
D Marchant CAA UK
K C Mann HK CAD
J Meirelles CTA
R Pennanen TCCA
T Llewellyn JAA

Apologies:

A Fergusen CAANZ
C Damers MOT Aruba
T Jauernig LBA

CC : G Litterscheidt – JAA HQ
JAA MRBWG

The attached agenda formed the basis for the discussions of the meeting Attachment A.

- 1. Opening Comments and Introductions of new participants** The meeting welcomed new members with associated introduction of all.
- 2. Review minutes from December 2001 Hoofddorp meeting.** The minutes of the previous IMRBPB meeting (December 2001) were accepted without further comment.
- 3. Review IMRBPB Charter and Terms of Reference** A review of the IMRBPB Charter was carried out with minor changes made and agreed at this time. These changes arose from experience gained. Attachment B provides the amended Charter which is to be posted on the JAA website when signed off by the Charter signatories. (www.jaa.nl). Discussions regarding the possible phasing of the IMRBPB meetings with those of the ATA MPSC were discussed with the view that by separating the meetings which are held concurrently it would allow ATA to have time to respond to the output of IMRBPB meetings. This point was further discussed with Industry on the 12 September 2003. (Minutes for 12 September item 10 refers)
- 4. Review all open issue papers** A review of the following open Issue Papers (IPs) was carried out.

IP

- 1 The use of previously approved analysis for simple MSI's.** The IP recommendation refers to attachment #2 which illustrates the Jetstream draft PPH proposal to permit the use of previously approved analysis for simple MSI's, for which the referenced attachment is missing. **FAA will send for review.**

- 7 **Revision of MSG3.** While the recent actions by ATA to ensure MSG 3 remains current and up to date were much appreciated by the meeting, there was concern expressed that too rapid development of MSG 3 may lead to other problems, particularly the need for industry to keep pace. There was general consensus that a period of three years would be more appropriate and the issue was to be made known to ATA at the debrief on day three. (Action – consideration and response requested from ATA).
- 15 **MSG 3 Analysis of equipment such as ELT's; ULB's; FDR's; CVR.**
Non standard formats of MRB's with regard to national requirements. We cannot regulate the format through advisory material but it is important that such equipment is identified within the MRBR as such.
- 21 **HIRF maintenance.** The rationale for this IP remaining open was that ATA response is awaited (Action see ATA comments Attachment F).
- 22 **HIRF/Lightening protection Maintenance Programmes.** The rationale for this IP remaining open was that ATA response is awaited (Action see ATA comments Attachment F).
- 28 **Guidelines for JAA/FAA/TCCA participation in MRB's.** The missing page has not been located; however the continued airworthiness initiative may address this issue in any case.
- 42 **MRB Report Revision.** It was reported that the living document concept is an issue as it appears Airbus are not fulfilling on the their types. Also, it was agreed that Temporary Revisions should be incorporated into the MRBR within a two year period.
- It was agreed the new PPH's should only be agreed subject to a commitment to a clause requiring ongoing reviews of the MRBR. The period should be harmonized but this should be agreed formally (see proposal for a generic PPH which should also address this issue) (Action When established the PPH WG for this should consider an appropriate period.)
- 48 **Recognition of evident failure.** Remains open awaiting ATA comment (Action see Attachment F).
- 51 **MSG3 Revision, Authority Acceptance.** We should encourage ATA to submit amendments through the IMRBPB. Our system should be open with ATA given access to all IP's, which affect them. However at the present time Approval/Acceptance of MSG3 revisions is limited to the FAA this is not the desired approach or in line with the objective of improved regulatory harmony. (Action—IP remains open awaiting ATA RESPONSE & all open IP's should formally be sent to ATA – JAA will action).

- 56 **IMRBPB extended membership.** IMRBPB extended membership was proposed by this new IP.

Authority discussions agreed that there was time when the membership should be extended to include expert advisors/observers, such as issues involving ATA as owners of MSG 3. However, reservation was also expressed arising from previous bad experience where one such advisor “overstayed” his welcome leading to difficulties in continuing the normal meeting.

The Authority part of the meeting agreed that when identified as appropriate the meeting could be extended with the prior agreement of all board members to include Observers/Advisors.

Furthermore, it was also recognized that all board members should endeavour to provide representatives at the ATA MPSC as this is seen as the best opportunity for the Authorities to have an early input to future developments of MSG 3. ATA later confirmed that such attendance would be most welcome. (Action: Each PB member to seek representation at the ATA MPSC meetings)

The issue was further discussed at the joint Industry/Authority part of the meeting where the difficulties that ATA have with being tasked action items at a meeting at which they did not attend and furthermore they do not always have full access to IP’s.

The Authorities accepted that the current arrangements were not practical and were to consider ways by which this problem could be resolved.

5. Review and discuss new issue papers

IP

- 57 **Termination of hard copy MRB Report.** New IP on accepting the MRB report in electronic format was discussed.

The consensus was that this was in line with current trends. However, there may be some legal reasons why this could not be accepted by all. The final version once approved could be provided electronically, however for the purposes of approval the format should be that acceptable to the NAA (Opposing views, some considered that electronic versions did not provide easy review and may lead to eye strain while others felt electronic versions were the best way). (Action: IMRBPB members to confirm their respective legal position, based on the understanding that the original approval version be retained)

- 8 **Flight Crew performing maintenance.** Discussions regarding the implications of Flight Crew conducting maintenance tasks arising from the MRB process were discussed and it was agreed the MRB should not consider who conducted the maintenance but the analysis showed what was needed.

It was also generally accepted that a member of the flight crew may have a different perspective to that of ground personnel when conducting the same task. The main discussions arose from the way in which the analysis had been applied as it is known that some MRB WG's have conducted their analysis on the basis that flight crews conducted tasks in accordance with their normal duties and thus selected NO TASK on the basis of evidence to the flight crew.

However, it is known that some WG's as directed through the manufacturer and/or regulatory representatives took a more conservative route, effectively not taking credit of the time of the analysis for the "normal" flight crew actions.

The FAA position was that at the next technical review of MRBR's they need to be amended in accordance with FAA letter dated 1996. (Attachment C). **However, we need to establish if this can be retrospectively applied.**

54 Implementation of IMRBPB positions. New IP on the implementation of IMRBPB positions was submitted following which the lengthy discussions issued. The timescales proposal by the submitters was thought to be difficult within the JAA process given the need for all 35 member states to buy-in to the process.

It was concluded by the meeting that a more practical approach might be through the development of a generic PPH which could be jointly developed incorporating the closed IP's from the IMRBPB.

The acceptability would be checked with the respective management to confirm that to each Authority. It was also agreed that the best approach would be to establish an international WG to develop a harmonized generic PPH which could take into account relevant IP's.

The JAA confirmed that they were already working toward such a document and that they were happy to share draft material developed so far. It was also recommended that such a WG should be tasked with completing such a draft document within a one week meeting. (Industry day - ATA informed the meeting that they were working on an MSG Handbook on Applications based upon existing PPH's) **(Action: - All to confirm management support for the development of a generic PPH and that attendance to a WG would be supported by respective management.** Also, should we be working with ATA to prevent duplication of effort or are these seen as two separate issues?).

56 IMRBPB extended membership. See item 3. above, IMRBPB Charter amended to provide for extended membership. **IP closed**

6 Leaflet No. ## Emergency Escape Provisions - Doors and Escape Slides (Attachment D)

A pre-draft JAA TGL paper on Emergency Slide reliability sampling was discussed. Some interpretation issues were identified, primarily regarding the number of slides to be deployed (see para 4 of Attachment D). The FAA confirmed that their policy is included on the FAA Handbook bulletin board in draft form.

Some discussions took place regarding how we could allow Route and Safety equipment to be subject of a sampling programme. The members agreed to review and comment on the draft TGL to the JAA. (Action All – comments to JAA)

7. Discuss MRB Report approval process

The FAA advised that as a result of internal organisation the process for handling MRBR approval has changed with appointment of Barry Basse who will provide a centralised standardisation function as part of the FAA policy section, while the actual approval will be granted by the FAA; s ISC representative.

CTA Brazil explained set forth how their approval is granted, being that the MRB chairperson will sign the recommendation on behalf of the executive chairperson. A similar approach to sign off the annual MRB reviews is carried out.

8. Discuss responsibility of host regulatory authority at MRB meetings. The responsibility of the host MRB regulatory Authorities was raised as an issue where there were sometimes problems, which lead to some Authorities competence being questioned.

This further highlighted the need for chairpersons to fully understand the process and related policy issues. The JAA advised that they had been developing a “core competences” matrix for inclusion in their draft Handbook MRB. (Attachment E) and suggested that this may support a generic PPH See IP #54.

The meeting also wished to remind all participants in MRB’s that are responsible for ensuring compliance with the appropriate Advisory Circular / Joint Maintenance Procedures as applicable to MRB’s.

The JAA advised that they developed a draft matrix of core competencies for those regulators involved in MRB’s a copy of which is attached for information. (Attachment F)

9. Other Issues

TCCA wished to develop a harmonized policy on escalations of MRB check intervals, recommending that they be capped at 10% within a given time period, as they were concerned that some manufacturers would see incremental escalations for commercial reasons. They further intend to submit an Issue Paper to that affect to ~~be~~ [the](#) IMRBPB for consideration.

SFAR-88 was discussed and possible implications on the MRBR. The FAA will issue a separate Fuel System Limitation, and while the European approach is similar in concept tasks arising from the SFAR 88/equivalent review are likely to feature as CMR’s. There

IMRBPB Minutes

are some moves to remove any equivalent MSI's from the MRB. However, this is not consistent with current practices as SFAR-88/equivalent tasks are derived from an SSA which is independent of the MRB process and we should not mix the different processes. One attendee had heard that the Boeing "Classic" MRB's which had been subject to a review against MSG 3 were free to operators who had participated in the process of review while others would be charged for the alternate document. There was concern that this would lead to Operator's using unofficial copies which were not controlled and this point should be confirmed with Boeing.

Date of next meeting: 19 – 21 August 2003 (Ottawa)

10. Meeting with ATA and other industry personnel (12 September 2002)

Tom not sure the following details below are correct

Industry attendance		Apologies
R Anderson	ATA	G White IACA
A Harbottle	Airbus	
S Bradbury	Sinex	
R Skinner	Boeing	
J Filho	Embraer	
L Horton	NWA	
M Hammond	Delta	
F Hover	Honeywell	

The meeting welcomed the industry representatives with associated introductions of all. The Chairman debriefed industry on the IMRBPB meeting. B. Basse of FAA took the opportunity to detail recent changes within FAA

The efforts of ATA to keep MSG3 up to date were acknowledged but they were also advised that there were concerns that too frequent amendments may lead to other problems.

Industry through ATA made the point that they need to be involved with any issues where they were expected to action as a result of the IMRBPB meeting. ATA confirmed that there was a standing invitation to the IMRBPB NAAs to participate in the MPSC meetings. However, TCCA/JAA while recognising that problems could arise if they now have to seek joint approval, see this as the only way forward. If problems were dealt with at the initial stage this would be more practical than to end up revisiting old ground.

Ric Anderson of ATA then provided an outline of the issues discussed at the industry meeting.

Fault Tolerant Systems – the section 2.3.4 rewrite approved for incorporation in 2003.

IMRBPB Minutes

MSG Handbook on Applications – MSG document will be ‘barebones’ Handbook will contain application and methods. Seven PPH’s reviewed to date which will form the basis.

Systems versus Structures – WG reviewing when does landing gear go from structure to system etc. no progress.

Education in MSG and its use - Sinex gave the WG a presentation to the industry on their view of the basic structure of education to put into syllabus / training programmes.

Abbreviations used in MSG documents - to be standardised 2 letter and 3 letter cross-references to be included.

Arriving impact items - ATA provided listed the many impending rules that will impact on an already stretched industry. Such as SFAR 88 / 92, Ageing aircraft safety, CPCP NPRM, ASRAC, Bite vs Flight, CASS, Slides, SDR final rule, Aviation Safety Action Plan, Domestic RVSM, HBAW 02-02 HP cylinder, etc.

As a result of their MPSC meeting the ATA had formulated their position for each item that the IMRBPB had notionally placed action upon ATA. Attachment F.

(Action: All to review and comment via Tom Newcombe, FAA)

Airbus raised two points. One, they felt that industry should have a chance to comment on closed IP’s and two, because they had taken the conservative approach regarding Flight Crew performing maintenance (IP8) they may have been unjustly penalised.

Further general discussions took place on ‘fault tolerant systems’, joint IMRBPB industry meetings and MSG courses for NAA staff.

Attachments included:

- A Meeting Agenda
- B IMRBPB Charter **(To be provided later)**
- C FAA letter dated 1996 (See December 2001 minutes)
- D Leaflet No. ## Emergency Escape Provisions - Doors and Escape Slides
- E Core competencies for those regulators involved in MRB’s
- F ATA response to IMRBPB requested actions