

IMRBPB – 28 Sept 2004

Present:

T Newcombe	FAA
B Basse	FAA
D Pattie	CASA
K C Mann	HK CAD
J Meirelles	CTA
T Llewellyn	JAA
C Neudord	TCCA
B Hawes	TCCA
Len Arnot-Perrit	JAA

Opening comments

- Barry B. introduction of Herman Ross (Regional Manager Pacific)
- Barry welcome of MPEG and industry, and format of meeting
- Ric Anderson from ATA delivered a brief on present ATA organization.
- Tom L. brief on JAA new label. Things will stay as per normal.
- Round table introductions

New Issue Papers

ATA IP –005-04 / IMRBP IP #65

- amend MSG-3 to incorporate EZAP.

Ric Anderson went over proposed changes to MSG -3 and sought feedback from group.

Barry reopened Issue Paper 65 and suggested a number of word changes:

2-5-1 Procedure, Para L

- 1) remove the word 'program' for the first sentence and replace with MRBR, "uniquely identified in the program". Now to read, "uniquely identified in the data documentation"
- 2) remove the word 'program' from the sentence, "during future program changes". To read, "during future changes".
- 3) replace tractability with traceability.
- 4) consider AC 120-XX and MSG-3 in development of EZAP

Issue Paper 65 accepted and closed with changes incorporated.

ATA Issue Paper ATA-005-04 / IMRBPB Issue Paper 66

- Enhanced MSG-3 to incorporate SFAR 88 aspects considered by FAA Policy Statement PS-ANM100-2004-1029

Discussion proceeded with the common idea being that MSG-3 already fills this function with further action not being required. ATA stated that they are trying to be proactive to meet the requirements of the FAA Policy Statement by issuing SFAR 88 guidance with the next MSG revision. It was agreed to close this Issue paper, but remove FAA only reference including the reference to the Policy Statement and SFAR 88 and replace with the statement, 'regulatory policy developed for fuel tank safety ICA....'.

Issue Paper #66 accepted and closed by Industry Working Group with changes incorporated

ATA Issue Paper ATA-006-04 / IMRBPB Issue Paper # 70

-Better reflect AC20-107A regarding the 'growth' versus 'no growth' design concepts of composites.

DOT/FAA/AR-99/49 and DOT/FAA/AR-99/2 were discussed as both documents suggest composite designs are subject to fatigue.

Word changes to be incorporated. As per attached material. 'Should vs. may' and 'if vs. as'.

Issue Paper #70 accepted and closed by Regulatory/Industry Working Group with changes

ATA Issue Paper ATA-002-04 / IMBPB Issue Paper # 68

-Acceptable definition for 'adverse effect on operating safety'.

The recommendation of the regulatory / industry working group to the IMRBPB is to adopt the position, 'that while a definition of serious is not currently available, the ICAO and NTSB definitions of safety are not acceptable for use in MSG-3 analysis'.

This recommendation is based of the fact that the ICAO and NTSB definitions are focused on accident investigation and not aircraft operation.

While Issue Paper# 68 remains open, the IMRBPB supports the regulatory / industry working group recommendation.

Note:

Action Tom N. to coordinate a workable definition of serious. Individual NAAs to provide input to Tom N.

ATA Issue Paper ATA-003-04 IMRBPB Issue Paper # 69

- Ability of an air carrier to directly incorporate. MRBR revisions into their maintenance programs without undue additional justification.

This is a NAA maintenance program approval issue and not an IMRBPB issue.

This ISSUE PAPER is CLOSED

ATA Issue Paper AT-001-04 IMRBPB Issue Paper #71

-Identifying Normal Flight Crew Duties

FAA (Tom N.) stated that flight crews would not be given credit for maintenance. Industry is faced with the problem that since the flight crew check list is not approved, the working groups cannot take credit that those items contained in the checklist as being evident in the MSG-3 analysis.

Conclusion – *Credit can only be taken for activities carried out by the operating crew at their normal place of duty. E.g. Onboard the aircraft*

Issue Paper Closed

Bombardier Issue Paper 001-04 IMRBPB Issue Paper #72

- Recognition of evident failure

Alex B. stated that the definition should remain as shown in 2003.1, and not what is stated in IMRBPB Issue Paper 72.

It was discovered that IP #48 incorrectly states, ‘annunciated at the time of failure’ vs. “annunciated before next flight”. The issue paper will be corrected to read, “annunciated before next fight”.

Tony H. suggested ‘apparent’ should be used rather than ‘enunciated’ in the IMRBPB IP #48. This was accepted by regulatory’s present.

The Issue Paper # 48 will now read, “Failures can only be considered evident if apparent before the next day, otherwise the analysis must consider it a hidden failure”.

Note:

Issue Paper #48 changed to reflect above.

Issue Paper #72 Closed

Note:

Action to ATA to identify definition of evident in MSG-3 document.

Bombardier Issue Paper 002-04 IMRBPB Issue Paper #73

-Hidden functions of systems operated during an emergency situation

Alex B. feels this back drives the analysis forcing a route 8 on all functional failures and is not productive to a good program.

Airbus bought up the point that that this rule is affecting design decisions because now manufactures will not redesign due to the fact a task will still be applied since regardless of redundancy it will still be a route 8.

Item closed with no action

Bombardier Issue Paper 003-04 IMRBPB Issue Paper #74

-Position paper on the role of On-board Maintenance System

Issue Paper #74 - Closed Refer to IMRBPB #76

IMRBPB Issue Paper #75

-Requirement to use to latest version of MRB Report for new start up operators

Issue Paper #74 Closed - this will be dealt with by the applicable NAA of the operator

IMRBPB Issue Paper #76

-Central Maintenance Computers (CMC)

Proposed change to the last sentence of Issue Paper 76,

“IMRBPB should develop a policy statement highlighting that credit for CMC data may be used provided the system is certified (to the software level) and validated by the OEM and the necessity of a task to verify the CMC is performing to its intended function is considered”.

Accepted with changes above, Issue Paper # 76 Closed

IMRBPB Issue Paper #77

-Grouping of different tasks (GVIs, DIs and SDIs combined into one task)

Example from the Airbus 340 MRBR;

OPERATIONAL CHECK OF MANUAL RAT DEPLOYMENT FOLLOWED
BY FUNCTIONAL CHECK OF RAT OPERATION AND INSPECTION
OF FILTER ELEMENT BY REFERENCE TO DIFFERENTIAL
PRESSURE INDICATOR.

It is the position of the Regulatory / Industry WG that this practice is acceptable for new aircraft systems, provided there is a documented and auditable system to ensure traceability of the individual tasks. For legacy aircraft this practice is unacceptable unless the OEM has fully documented procedures for traceability that is acceptable and available to the NAAs. These procedures must be described in the program rules portion and the traceability document is included as an appendix to the MRBR.

Issue Paper #77 is Closed

IMRBPB Issue Paper #78

-Analysis of fuel tank flammability reduction of inerting systems

A copy of "JAA Administrative & Guidance Material Section 2: Maintenance part 3: Temporary Guidance Leaflet # 47, Guidance on CJAA Interm Policy on Fuel Tank Safety and its implementation" was provide to all participants .

Len Arnot-Perrit requested a position on the routing of inerting systems.

The Regulatory / Industry WG confirmed that this system would be a route 8 item.

This Issue Paper is Closed.

IMRBPB Issue Paper #79

-Harmonization of different definitions of PSEs consisting of the FAR and ATA-MSG-3 2003.1.

Jose stated that CTA would like the definition of a PSE to be changed in the MSG-3 2003.1 document (section 2-4-1), to reflect the definition stated in FAR 25.571. Currently the definitions are opposite.

Discussion resulted in the following:

MSG-3 2003.1 section 2-4-1 will be changed to read, “SSIs must not be confused with PSEs (FAR 25,571); however, all PSEs must be addressed by the SSIs.”

NOTE:

Before this change takes place, subject matter experts will be consulted for concurrence. If concurrence is obtained (this concurrence must be sent to Ric A. by 15 Oct. 2004), this change will be reflected in the next revision of MSG-3.

Issue Paper #79 CLOSED

Evolution Document

Rick A. asked what the “game plan” is for the Evolution Document.

The plan is for both JAA and Transport Canada evolution documents to be submitted to IMRBPB members and the ATA (for circulation to MPEG for comment). A joint working group would then be formed to develop a ‘common evolution document’.

Tom N. will chair this activity and will coordinate future activities.

IMRBPB Regulatory Only Meeting

Issue Paper Control

- Issue Papers will remain on the JAA web site. If this becomes a problem for the JAA, FAA has volunteered to take on this responsibility. Tom L. to keep in touch with FAA ref. this topic.

MSG-4

- Due to new developments in bit checks/HUMS and the ability of the current MSG-3 revision to incorporate these features, FAA upper management feels that a new version of MSG-3 (MSG-4) maybe required.
- The IMRBPB position is that not enough is known about the specific areas of concern to come to an intelligent decision on this topic. Boeing should come forward with the specific areas of concern before an IMRBPB position is sought. That being said, the IMRBPB does not own MSG-3 and as such cannot force a new revision.

Items to be discussed from the Joint Meeting

Charter to be revisited by IMRBPB

1) Item 9 will now read, "All proposed agenda items are to be submitted to the respective authority 60 days prior to the scheduled meeting for inclusionissue paper format, with substantiation and examples."

2) Member Signatory Page to be revised to include:

Hong Kong Civil Aviation Department
Centro Tecnico Aeroespacial
Civil Aviation Safety Authority Australia

All members at conclusion of meeting will sign new 'IMRBPB Charter'.

It was decided by the IMRBPB that all IMRBPB signatory members would endorse all future revisions of MSG-3.

Final Business of Combined Meeting

A location and date for the 2005 IMRBPB meeting will be Germany the week of the 21-23 June to be hosted by the JAA.

A change of format was discussed with the final decision being that:

- Examples must be provided with each issue paper
- Discussions be limited to the material contained in the issue papers
- Issue papers must be submitted 60 days prior to the meeting
- There will be a short combined meeting to be held after the IMRBPB to brief industry as to the final decisions. (This will not be a debate.)