INTERNATIONAL MAINTENANCE REVIEW BOARD POLICY BOARD MONTREAL, CANADA FEBRUARY 20 TO 23, 2007

Tuesday, February 20, 2007

A) Introduction of industry and regulatory personnel
Attendance list will be attached (available on the EASA web site)

Break out

B) Regulatory discussion

1) Discussion of Charter for rewrite
Change IPs going to the Chairman to IPs going to the secretary.
The only other changes made were to names of the regulatory authorities who sign the charter.

2) Discussion on IP Procedures
Item changed from IP going to the Chairman to IP going to the Secretary.
Post meeting note: New IP procedure revision 1 dated 2/20/2007. posted on EASA web site

3) Discussion on IP Format
Minor word changes to the form
Post meeting note: New IP template rev 2 dated 2/20/2007 posted on EASA web site

C) Review of action item list

Action Item 04/01 IP 68: Serious Injury
Reviewed the definition sent in by Bombardier, Lynn Pierce and further discussion on this item. After trying to gather consistent definition of serious injury from medical associations it was decided to leave the definition as is and also not to remove the words "serious or".

Action Item 04/02 IP 72: Agree with definition as proposed which is: **Failures can only be considered evident if apparent before the next day, otherwise the analysis must consider it a hidden failure.**
No MSG-3 change required, existing MSG-3 text (Rev 2005.1) is adequate.

Action Item 05/01 and 05/02 IP 88: The IMRBPB agrees to the new wording submitted and will revise IP 88.

Action Item 05/03 IP 44: Everyone is to send Tom Newcombe who they would like as a representative on a working group. Lynn Pierce of the FAA will head up this working group.

Action Item 05/04: Collect any data in relation for IP 62. This item closed and numbering corrected regarding the subject of this IP. There were several that were associated and duplicated.

Action Item 05/05 IP 71: Remains open pending submittal of 3 new IP.

Action Item 05/06 IP 81: Review after discussion with MPIG

Action Item 05/07 IP 83: Keep this open and send anything anyone has to Francis.

Action Item 05/08 IP 86: No common agreement regarding the need, this IP is being closed.

Action Item 05/09 IP 87: Dual MRBs: Remains open.

Action Item 05/IP 80: Will discuss this more with industry.

IP 89: Process for coordinating MSG-3 derived task with CMR: This was discussed with different concerns. Should this be a change to MSG-3, or 25-19, or policy paper generated by the IMRBPB. Proposal is to state this should not be in MSG-3 but 25-19.

IP 90: Sustaining MRB Activities and regulatory participation. TCCA, this would only be for post MRB activity.
The following is addressed by EASA:

- Participation at IMRBPB of concerned Authority required
- Such process can only be done through a bilateral agreement between each concerned Authority
- The approval has legal aspects, therefore such process would require legal advice form concerned department
- Can only concern 2 individual Authorities through specific agreement, cannot be the extended rule for any MRB activity with any NAA.

The following is addressed by the FAA:

- The FAA is reluctant to such a proposal considering the experience and differences remaining even with the IMRBPB in place.

IP91: EAPAS requirements to Approve EZAP. The IMRBPB position is that they think the EPAS rule for controlling the MRB process for approval of tasks, description, or intervals is inappropriate use by others outside this process.

Wednesday February 21, 2007

Joint Meeting

Barry Basse went through the items that will be discussed during the next two days.

Greg Swears from Boeing presentation on HIRF/L IP 80
Assurance plan is to be removed from discussion
Review of flow diagram
Review of FAA comments #1 on CMM
Jeff's comments on assurance program and flow chart
Regulatory concern is that if removed the working group will have to analyze all hidden functions because of the unknown
Jeff Phipps will call Tom Dean and discuss and then propose a paragraph for inclusion into MSG-3

FAA Comment #2 Common Mode
Common Mode in localized area reference will be included in the text which describes box 6.
IMRBPB agrees with the process of including this wording in the text.

FAA Comment #3 Developmental Data and Qualification Test Data:
IMRBPB agreed to accept MPIG proposal.

Francis Jouvard gave a presentation on the EASA Web Site

In the column for Policy issued, the regulatory will add something to show if there is policy or waiting to be written.

Date should be written as 20 Feb 2007

Review of regulatory action item list

04/01 related to IP 68, no change to definition of serious injury.

04/02 agree with wording and IP closed and added as attachment to IP 72. Will be incorporated into next revision of MSG-3, Status closed

05/01 and 05/02 Agreed with MSG-3 revision submitted by MPIG. Add attachment 1. Status Closed

05/03 IP 44: write wording for this. Status Open

05/04 IP 62: Status Closed

05/05 IP 71: Three new IPs will be submitted by Tony H. to MPIG by June 07. Remains open waiting for the new IPs.

05/06 IP 81: After presentation of the revised flow charts this was accepted by the IMRBPB. Status Closed, Embraer will submit a new IP address other concerns of FD.

05/07 IP 83: Status Open

05/08 IP 86: Francis explained his concern for abnormal operation. For now this IP is closed. He stated he would submit new IP at a later date. Status Closed

05/09 IP 87: This IP is to be continued and regulatory group will propose something for the next IMRBPB. Status Open

05/10 IP 80: After further discussion on the wording, agreement was reached. New attachment supplied .

Review of new Issue Papers proposed

IP 89 Process for coordinating MSG-3 derived tasks with Certification Maintenance Requirements (CMR's)
Don Bethel presented this IP.
25-19 is in the process of being revised.
Airbus would like to make sure international harmonization is still being considered
TCCA has used their process to do a CMCC which may not be the same as others.
A smaller group agreed to rewrite the wording in the flow chart and wording of the text and submit to the entire group on Thursday.

Thursday February 22, 2007

IP
Jeff Phipps presented his rewrite of the Hirf/L requirements
MPIG presented 3 options to the wording
Group elected to work on the wording for the paragraph submitted by Jeff. Tom Dean added additional comments which will be include into the MSG-3 document.

IP 89: The group reviewed the rewrite to boxes 2, 3,6,7, and 9 of this IP. Also the wording in the text was changed to match the text. Group agreed to all changes. This will be inserted into MSG-3 at the next revision. Status closed

IP 91: There was a lot of discussion on this subject and the wording that will be inserted into the front matter of the MRB Reports. The IMRBPB feels it inappropriate for cert to interact into MRB process. Status Closed

IP 90: Sustaining MRB activities and regulatory participation. This would only be for post certification. The following meetings would be the ones TCCA is considering. Where there were new requirements you would involve all. Evolution or escalation would fit into this process. Criteria would have to be established up front. Bombardier supports TCCA IP. Need document that harmonizes criteria and implementation procedures for 1529. What should be the next steps. Need to look at all programs this may effect. This should be an information gathering point and report back maybe within one year. Leave IP open and re-evaluate this at the next IMRBPB.

Action item: TCCA to determine the technical elements for consideration in order to develop implementation procedures for the harmonization of MRB requirements.

Comment was to include all of 1529. TCCA wanted to keep it with MRB at this time.

Status Open

Friday February 23, 2007

Presentation by Tom Fodor from IATA on Maintenance Program Optimization
FAA would like to get copy of the final IATA document
This information might be used to help develop information for IP 44.

Airbus discussion on Failure Before next Flight
It was agreed to remove the wording and change IP 72. Wording will stay with daily basis. No changes to existing MSG-3 document 2005.1
IP 72 Status Closed

IP 48 reopened, discussed with same information as IP72 and then closed again referencing IP 72.

IP 80 HIRF/L: Agreement on the wording, flow chart and glossary. Information will be included into MSG-3 2007.1
Status Closed

Presentation of EWIS to the Regulatory group and some discussion with industry. The FAA stated that there would be a requirement to identify an item as EZAP or the manufacturer could propose an alternate method for identification.

The completed Issue Papers and Action Item list are listed on the EASA web site.

Next Meeting: Cologne, Germany week 17 April 21 to 25, 2008

Barry Basse, Chairman, IMRPBP

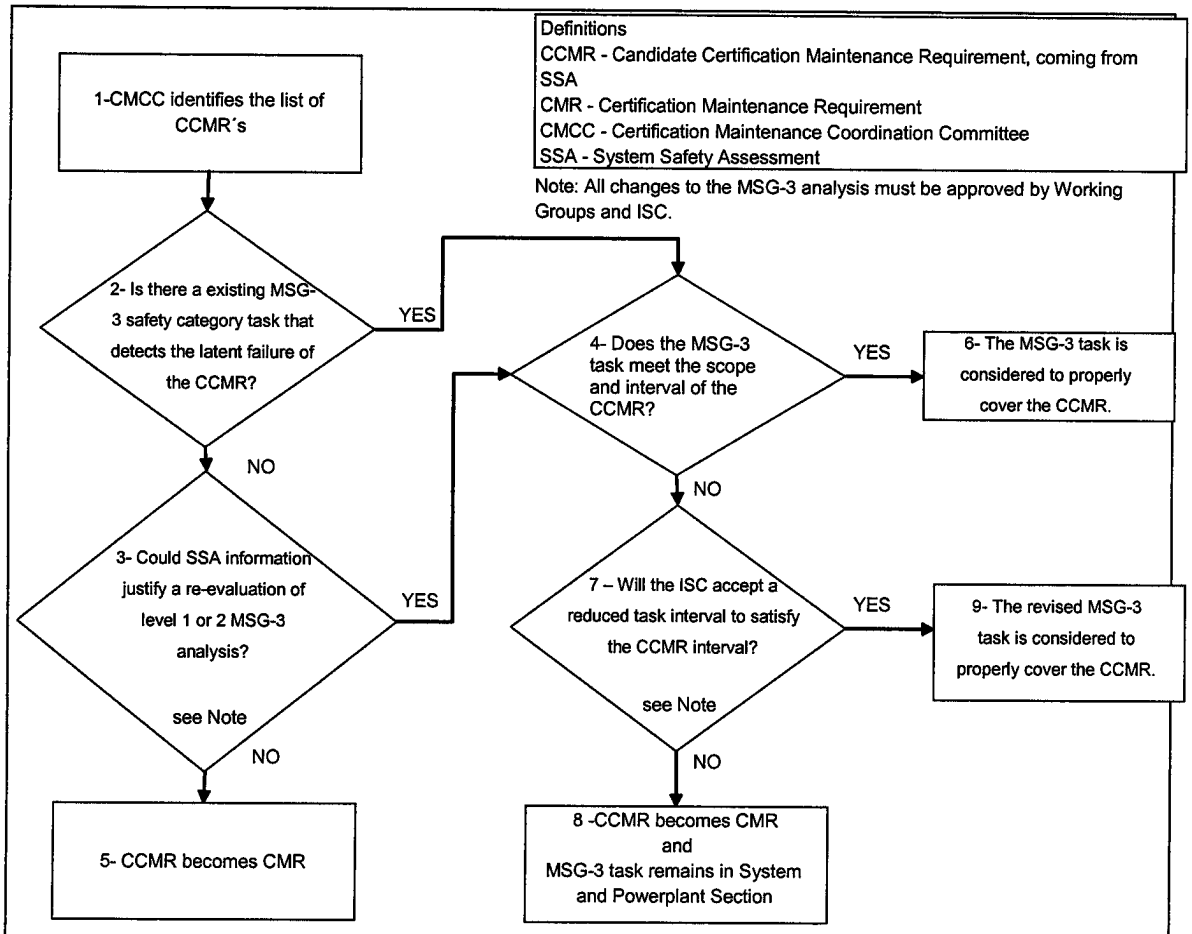
International Maintenance Review Board Policy Board (IMRBPB)
Issue Paper (IP)

Initial Date: January 2007
IP Number: 89
Revision / Date: 1 dated 22/FEB/2007

	Process for coordinating MSG-3 derived tasks with Certification Maintenance Requirements (CMR´s).
Submitter:	Embraer
Issue:	The current MSG-3 document does not describe a process for coordinating the MSG-3 derived tasks with CMR´s.
Problem:	The absence of a process for coordinating the MSG-3 derived tasks with CMR´s in the MSG-3 document is causing discussions about: - What is the criteria for deciding when a Candidate CMR will not become a CMR? - What is the criteria for the decision of covering or not a CCMR with a MSG-3 task? - How to deal with the MSG-3 tasks that have the same intent of a CCMR and decided to cover a CCMR?

Recommendation (including Implementation): Revise the MSG-3 document section 2-3-8 item 6 with the following statement:

From:
"The process for coordinating MSG-3 derived tasks with CMRs is described in detail in AC 25-19 and involves a Certification Maintenance Coordination Committee (CMCC) that may influence the MWG's interval decision."
To:
"The process for coordinating MSG-3 derived tasks with CCMRs involves a Certification Maintenance Coordination Committee (CMCC) as described by the AC 25-19. The CMCC may influence the MWG's decision as per the flowchart below. Following this process should be an acceptable means of using an MSG-3 Task in lieu of a CCMR as determined by an appropriate CMCC.



1- CMCC identifies the CCMR's from the System Safety Assessment (SSA), based on AC 25-19.

2- CMCC determines if a MSG-3 defined safety category task exists that will detect the latent failure identified in the SSA.

3- If a MSG-3 task does not exist, the CMCC will ask the ISC/WG if a reassessment of the MSG-3 analysis is possible to include a task, based on additional information provided by the SSA report.

4- If the reassessment was performed, and a MSG-3 task generated, does that task meet the interval and scope of the CCMR? If the scope does not meet the intent of the CCMR, go directly to box 8.

5- If the reassessment was not performed, or if the reassessment did not generate a MSG-3 task, then the CCMR becomes a CMR.

6- The MSG-3 task is considered to properly cover the CCMR.

7-The ISC/WG may accept a CMCC proposed reduction in the MSG-3 task interval, in lieu of a CMR. ISC/WG should consider advantages and disadvantages of either. No change to scope should be acceptable.

8- If the ISC/WG does not accept the CMCC proposed change, then a CMR is established. The CMR and MSG-3 tasks remain independent.

9- If the ISC/WG accepts the CMCC proposed task, the revised MSG-3 task is considered to properly cover the CCMR.

IMRBPB Position:

Date: 21/FEB/2007

Position: PB agrees with the proposed additional guidance and for implementation in the next MSG-3 revision.

Status of Issue Paper (when closed state the closure date):

Closed the 22/FEB/2007

Recommendation for implementation:

To be included in MSG-3, no need of specific regulatory implementation, However action item is open to provide the information to each NAA certification office for coordination with AC 25-19 or equivalent.

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority.

IP 89 Jan 07 Attachment 1

2-3-8. Systems/Powerplant Task Interval Determination

>

6. Certification Maintenance Requirements (CMRs)

In addition to ...

A CMR is a required periodic task, established ...

It is important to note that CMRs are derived from a fundamentally different analysis process than the maintenance tasks and intervals that result from MSG-3 analysis. The process for coordinating MSG-3 derived tasks with **Candidate** CMRs **involves a Certification Maintenance Coordination Committee (CMCC) as** ~~is~~ described in detail in AC 25-19**.** **The** ~~and involves a Certification Maintenance Coordination Committee (~~CMCC~~) that~~ may influence the MWG's ~~interval~~ decision **as per the flowchart below. Following this process should be an acceptable means of using an MSG-3 task in lieu of a CMR as determined by an appropriate CMCC**.

Figure 2-3-8.6 CMR Coordination

(see IP #MPIG2007-1 attachment 2)

Figure 2-3-8.6 Flowchart Steps:

1- CMCC identifies the CCMR's during the System Safety Assessment (SSA), based on AC 25-19.

2- CMCC determines if a MSG-3 defined task exists that will detect the latent failure identified in the SSA.

3- If a MSG-3 task does not exist, the CMCC will ask the ISC/WG if a reassessment of the MSG-3 analysis is possible to include a task, based on additional information provided by the SSA report.

4- If the reassessment was performed, and a MSG-3 task generated, does that task meet the scope and interval of the CCMR?

5- If the reassessment was not performed, or if the reassessment did not generate a MSG-3 task, then the CCMR becomes a CMR.

6- If the MSG-3 task meets the interest and intent of the CMCC, the task is placed in the MRBRP

7- If the MSG-3 task does not meet the interest and intent of the CMCC, the ISC/WG may accept a CMCC proposed change in the MSG-3 task interval, in lieu of a CMR. ISC/WG should consider advantages and disadvantages of either. No change to scope should be acceptable.

8- If the ISC/WG does not accept the CMCC proposed change, then a CMR is established. The CMR and MSG-3 tasks are defined independently.

9- If the ISC/WG accepts the CMCC proposed task, it is placed in the MRBRP with the proposed changes.

IP 89 Jan 07 attachment 02

Figure 2-3-8.6 CMR Coordination