

**IMRBPB Minutes of Meeting with
Industry**

April 22-25, 2008

EASA, Cologne, Germany

Participants: See participant list with contact on EASA web site

IMRBPB Meeting April 22, 2008

Welcome by Francis Jouvard.....10 min

- Presentation by Evan Nielsen...Flight Standards department manager.....10 min
- MPIG representatives retired to separate room for MPIG caucus.
- IMRBPB meeting continued while MPIG was in caucus.

IMRBPB Meeting Resumed with Industry Participation, April 23, 2008

- Welcome by Francis....10 min (Update industry as to yesterdays activities)

The main result of the yesterday IMRBPB caucus is:

IMRBPB Charter

The charter was amended to include IMRBPB voting practices during election of officials. Each signatory State will receive one vote. A 75% quorum of signatories is now required for an IMRBPB vote to take place.

IMRBPB Election of a new board:

Chairman: Francis Jouvard (EASA)

Co-Chair: Cliff Neudorf (TCCA)

Secretary: Bruce Hawes (TCCA)

Review of IP management Procedures:

- 1) It was noted that Issue Paper Submission procedures are different in the Charter than in the IP Procedures document (Charter states IP's are to be submitted to the Chair and IP Procedures states IP's are to be submitted to secretary). Procedures

now reflect... "Candidate IP's are to be submitted to the IMRBPB Chair" in both documents.

- 2) Required change made to IP Procedures for posting of accepted IP's. Now reads, "if candidate IP is accepted for submission it will be sent to the EASA web master for posting".
- 3) Numbering of candidate IP's will be done following acceptance by the IMRBPB at the IMRBPB meeting (as per amendment to IP Procedures).
- 4) IP closure criteria added to reflect that 100% of attending IMRBPB signatories must agree to a common position before an IP could be closed.

Review of Policy Implementation

- 1) TCCA provided the Transport Canada excel chart showing IMRBPB Issue Paper implementation.
- 2) IMRBPB agreed to open an action item to complete a similar chart for all IMRBPB NAA's (Action Item 08/01).

Review of Action Item list:

- 1) Action Item 05/03, IP 44 (evolution) Action Item: Closed
- 2) Action Item 05/05, IP 71 (Action Performed by Flight Crew). Stays open until meeting with industry.
Action Item Open
- 3) Action Item 05/07, IP 83 (Letter of Confirmation) IMRBPB will keep this open and will try to close by end June 08. TCCA will draft a common letter (and circulate to IMRBPB) that could be used internationally. **Open Action TCCA**
- 4) Action Item 05/09, IP 87 (Dual MRBR's) Stays open. IMRBPB to form a working group to deal with OEM's publishing dual MRBR's. EASA proposed the week of Oct. 20th 2008, for WG to be held. First WG to take place in Ottawa. **Open Action TCCA**
- 5) Action Item 05/08, IP 86 (Non Regular Operation). FAA /TCCA do not feel that this IP is required' as it is already dealt within the ICA under "long and short term storage and re-activation". EASA stated they would submit a new IP and come back on this by next IMRBPB. Action Item **Closed**

- 6) Action Item 07/01, opened in error and has been closed. Action Item **Closed**
- 7) Action Item 07/02, IP 81 (To clarify FD Analysis in Relation to IP 81) Open awaiting information from Embraer. Action Item **Open**
- 8) Action Item 07/03, IP 89. (Provide IP 89 to Cert. Office for harmonization with revision to AC 25-19 or equivalent.) All NAA's have independently dealt with this issue through contact with their respective Cert. Offices. Action Item **Closed**
- 9) Action Item 07/04, IP 90 (Harmonization of MRB activities/participation). The IMRBPB has determined going forward with this IP is not in the best interest of industry, international harmonization or safety. Action Item **Closed**

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Review of action items with industry

- 1) With reference to **Action item 05/05** Tony Harbottle (Airbus) requested IP 71 stay open until finalization of MPIG open actions. IP 71 will stay open until next meeting.
- 2) Industry was advised of dates and location for next IMRBPB (31 March-3 April, 2009 Sao Jose dos Campos, Brazil). Thank you to ANAC for organizing this next meeting.
- 3) With reference to **Action item 05/09**, Industry was advised of Dual MRB (IP 87) working group to be held in Ottawa, Canada the week of October 20th, 2008. The first day of the meeting will be NAA's only with affected OEM's being invited to take part in succeeding days of the meeting. Date TBD
- 4) With reference to Action Item 07/03 (IP89), Tony Harbottle expressed concern that industry will not have a chance to comment on the re-write of AC25-19 (but he has heard that work on AC 25-19 has not proceeded). Tony Harbottle asked Tom N. (FAA) if this is the case. (As the original AC25-19 was harmonized between industry, regulatory cert and MRB personnel there is a concern that industry and the IMRBPB will not be included in this revision process which could lead to a disconnect between the CCMR and MRB processes). Tom N. will

check on the current state of AC25-19, and provide a response/update to see if this will as well be a harmonized process. See last page § “IP template”

Review of EASA website

- 1) Francis requested industry to review the contact list on the website to ensure it is correct. Industry verified all contact information is correct.
- 2) Review of IP Management Procedures changes with industry. Tony H. stated that industry should be included in the IP management procedures so industry concerns can be recorded and dealt with within the formal IP procedures. Meeting minutes from 2005 were reviewed and it was noted that industry had requested a block be added to IP which could be “checked” if industry was not in agreement. At this point, Cliff requested a “NAA side bar” before any decision was taken. This was agreed to by the IMRBPB.
- 3) 2007 meeting minutes were reviewed and accepted without comments

IP 92 SHM (Structural Health Monitoring) (refer to SHM presentation)

Presentation on SHM by Holger Speckmann (Airbus)

- 1) SHM was given Issue Paper number 92
- 2) Tony gave a brief statement as to the history of SHM and the resources that are required to bring SHM into being. This was followed by the SHM presentation.(available on the EASA web site)

(Presentation stopped at this point for address by EX of EASA)

Presentation by the Executive Director of EASA - (Mr. Patrick Goudou)

- a) Mission and goals of EASA
- b) History and the way forward for EASA
- c) What EASA does today

Continuation of IP 92 SHM

- 3) After the presentation Cliff Neudorf asked how long before SHM was certified for use on aircraft and how long before it would be utilized on aircraft. Response from Airbus; unsure if it will be certified but would be 1 1/2 – 10 years depending on the application.

- 4) Load Monitoring versus SHM for future application was discussed.(if load monitoring is part of SHM). Cliff N. SHM is like NDT, which requires the certification of the technique against known standards, but certification is not in place for SHM. As well it is a concern that SHM is being presented as a means to replace NDT inspections.
- 5) Marcus (EASA): Can you explain how SHM would not need certification?
- 6) Reply: Tony H. (Airbus): We cannot address “certified” but system will be “qualified”.

IP 92 was presented at this point

- a) Tony Harbottle stated MPIG has formed a working group to facilitate inclusion of SHM into MSG-3.NAA will be invited to participate with industry to refine the terminology to be included in the MSG-3 document but not at the first meeting.
- b) IP 92 presented by Lorenz Wenk (Airbus). Changes recommended to the definition and document content. (Refer to final IP for content)
- c) Discussion about whether SHM should be considered SDI or NDI inspection.
- d) Cliff requested an IMRBPB caucus before this IP goes any further. Unsure if SHM fits the current definition for SDI or NDI and may require a separate inspection term.
- e) Markus feels a change is not required as the current MSG-3 SDI definition covers this technique.
- f) Francis asked if the final definition as shown on the screen is acceptable as a proposal. Yes as a proposal.
- g) For 2-4-2 “Scheduled Structural Maintenance”....changes recommended.(refer to final draft)
- h) Francis then asked if 2-4-2 is found acceptable as a final proposal. Industry stated this is their final proposal.

After lunch Day 2

Presentation on CPCP (Keeping Corrosion Under Control) - discussion topic only

Presenter; Richard Minter (EASA certification office) and Ralf Schneider (EASA-MRB section)

- Background
- Standardization of MSG corrosion application
- Role of MSG-3 in assuring corrosion control

Operator Comments

MPIG feels that CPCP is handled correctly today. But is willing to work with the NAA's for harmonization of CPCP requirements, and requests that the IMRBPB organize a working group to achieve this.

Tom Newcombe:

Disagreed with the CPCP presentation. The presentation should be modified to reflect what is happening today within the maintenance program. "In short what is being done today is correct".

Cliff Neudorf agreed with Tom N. and wants CPCP to remain in the MRB process. What is missing today within TCCA is the Equivalent of EASA AMC 20-20 Appendix 4, and he would initiate action to publish it for Canadian use.

Tony asked if the AC had not been revoked would CPCP be handled correctly. Francis replied yes.

Comment by Johan... "We have been doing CPCP for 18 years and while they do not reduce intervals for level 1 corrosion we modify the existing procedures to handle corrosion".

Note: Meeting with Industry recessed to permit Regulatory Authorities to Caucus

IMRBPB reconvened with Industry

Francis gave IMRBPB position stressing that although IP 92 (SHM) is not accepted, the IMRBPB support the initiative for SHM and is requesting to participate in the MPIG and CAW working groups before to agree on any reference of SHM in the MSG 3 document. Ken further amplified that this is due to fact that the IMRBPB currently does not have the experience to reach an informed decision.

Tony Harbottle expressed concern that SHM is the same as any SDI and therefore should not be held back from being placed in the MSG-3 document.

Cliff stated that the statement contained in the IP should give the industry a sense of confidence that SHM will move forward (commitment to participate in working groups and work to finalization by next meeting).

Dual MRB's IP 87 (Action Item 05/09)

Francis briefed the MPIG on the Dual Working groups (refer IP 87) to be held week of Oct.20th, 2008. Note: First day will be NAA's only. Invitations will be sent out by TCCA.

Opening by Francis.....10 min

IP 93 Single Database for Aircraft Maintenance Specification (SMD)

- 1) Presented by Jorg Coelius (LHT)
- 2) Introduction and history (see ~~attached~~ presentation on EASA web site)
- 3) IATA is looking at a 2-3 year timeframe for implementation

NAA comment; With a SMD, will the authorities be required to check the database for changes or would there be notification.

MPIG reply. (Tony Harbottle) Email notification will be given as it's done today

NAA comment: (Cliff Neudorf.) I can't see this working with a single database, are sure you don't mean "Distributed" database?

MPIG reply; (Tony Harbottle) No we will use a single database. Fields would be coded to MRB, CMR etc.

IMRBPB: (Cliff Neudorf); I can see this being a problem.

IMRBPB: (Ken Kerzner.); I too would have a problem with this, but I feel that this concept should be supported

IMRBPB: (Francis Jouvard).: As with the FAA I too support this concept. What about the revision process?

MPIG (Tony Harbottle); Either we publish the MRBR requirements. immediately after approval but the operators are not forced to do so (e.g. 1 year to implement) or we publish the SMD at a regular revision date, which means the authorities agree to delay the publication of the MRBR). We need the certification to be involved.

There will have to be a time lag between posting the approved data/task to give operators time to place the new requirement in their maintenance programs.

Cliff Neudorf. (TCCA): Why can't they just electronically roll it in their program?

Tony Harbottle(MPIG): If operators had to do this on a daily bases there would be no support for this IP. In Europe this currently has to be done on a yearly interval.

Cliff Neudorf(TCCA); Expressed concern as to how this would be applied to the other requirements (CMR's, ALI, etc.)

Tony Harbottle(MPIG): We have a plan in place that should satisfy all NAA concerns in this area.

Tom Newcombe (FAA): Develop a format / process and bring it back

Francis Jouvard (EASA): Proceed phase by phase and bring it back

Tony Harbottle(MPIG): Just to clarify this not a replacement to the current system but an option

Francis Jouvard. (EASA): Would you be including the IMRBPB in this process?

Tony Harbottle (MPIG); Yes. So I take it the IMRBPB response is positive and we will proceed from here.

IMRBPB; Concur

Boeing: It's important that we talk to all sides (cert, aeg).

Ken Kenneth. (FAA): Recommend we keep the IP open and document the IMRBPB support.

IMRBPB will discuss this in the caucus.

Cliff Neudorf. (TCCA): Have you thought about if one NAA did not want to go in this direction?

Tony Harbottle. (MPIG): Since the cert side is handled under the bilateral the MRB is the main concern.

General concern that a CMR/ALI etc. task would override a MRB task in the name of consolidation. IMRBPB requires this does not happen.

Francis Jouvard. (EASA): Ended the discussion at this point

Meeting recessed

Welcome By the EASA Certification Director, Dr. Norbert Lohl

0905-0930

Break 0930

FJ proposed IP 93 SMD discussion be closed, and be continued at the IMRBPB caucus. This was agreed to by industry and IMRBPB.

Review of MPIG Comment to IP 44(MRB Check Interval Escalation)

IP 44 (MRB Check Interval Escalation)

Francis gave a brief history of IP 44 and stressed that all current OEM practices were taken into account in the development of IP 44

The discussion takes place around the "evolution-optimization Guidelines" document

Cliff stressed that an accuracy/deviation factor must be in place (2%)

Question to the FAA from MPIG: If this IP is passed will the FAA memo be revoked?

FAA reply: Yes.

MPIG comments presented by Brian McLoughlin (Boeing).

- 1) Good job and thanked the IMRBPB for the chance to be involved.
- 2) A glossary should be added to the document (List to be provided by industry).

- 3) The document should call out the intent of the terms “ should and “shall”
- 4) Further industry concerns/comments presented at meeting and included as attachment.

Lunch

IMRBPB and MPIG Caucus

Results of Caucus Presented

Francis presented the results from the IMRBPB caucus.

1/ Regarding IP 93:

IMRBPB supports to continue developing the SMD concept. However the IMRBPB suggests policy board participation is necessary for understanding and acceptance of this new concept.

2/ Regarding IP 44

Tony Harbottle/MPIG has a concern with the rewording of the evolution document para 7.5 and would like it to reflect validation of the process, not a validation of the results of the evolution exercise. As written Tony feels that this would lead to a constant evolution exercise where another evolution exercise would need to be carried out in order to validate the first.

General discussion followed on the wording of this paragraph.

This is two issues, validation of the process and validation of the change. Cliff to provide wording Friday AM.

Action Item 08/05 taken to review sentence and clarify

Brian presented the MPIG comments.

See attachment...

- MPIG requests clarification of paragraph 7.8. Clarification provided, sentence changed (refer to final document). Closed
- Revision processes should be established.
- Reference to “airliners” and “air carriers” should be changed “operators”. To be incorporated in next revision.
- MPIG wants the appendixes removed from the IP 44 evolution-optimization Guidelines document. Boeing stated they did not realize the example they provide for IP 44 evolution-optimization Guidelines was going to be attached to the document. Boeing does not want their example used, and recommends not attaching any examples as it might “confuse” people. TCCA stated that when the

examples were collected it was with the clear intention of publishing them as guidance for the general user of the evolution document when calculating a representative sample size. TCCA asked the OEMs if their samples as submitted could not be used to calculate the sample size. No OEM said that the example they provided would not work.

- Meeting closed

Francis opened meeting and provided a recap of the last days activities.

Action Item IP 44

Industry Comments reviewed and IMRBPB position provided.

Paragraph 7.5 position rejected by Tony H. (Airbus) as he feels this would only validate a subset of the tasks and therefore he does not see the added benefit of this sentence.

TCCA Comment: If this activity is not happening within the OEM internal procedures then the regulatory confidence in their processes would be reduced

FAA Comment: It makes sense to do this in order to validate the results.

Airbus: This should be a standard way of business and not specific to evolution

Suggestion brought forward by IMRBPB: add to second paragraph of 7.5, “or demonstrate that a equivalent written internal process already exists.”

FAA comment: This is a basic requirement of a SMS.

Airbus comment: Reliability data from the operators is not available for the manufacture therefore collecting this data would require a major effort from the OEM and operators.

(This topic proved very contentious and a lot of conversation/debate went on as to the legal requirement for an OEM to support the requirements of 7.5)

EASA: why don't we open an action item to develop guidance to meet the intent of paragraph 7.5 to address industry concerns.

Decision was made to leave the sentence in place with the additional wording provided by TCCA (see above) but in parallel open an action item (action item 08/05) to have industry propose an acceptable process/method which addresses the requirements and needs of the 2nd paragraph of 7.5. Regardless this process must be in place by 01 April 2010 (See final document).

MPIG adjourned to Caucus

MPIG returned and agreed to 7.5 with the addition of “ to the same intent” added to the end of last sentence. (MPIG still has action item 08/05 to define “intent”)

This was found acceptable to the IMRBPB and industry accepted.

Removal of IP 44 Evolution-Optimization Guidelines Document Appendix

Francis explained that the appendix B&C will be removed but the examples will be published as guidance alongside the evolution document on the net.
Industry requests wording be added to explain the possible use of guidance material (action Cliff to provide wording to be posted)

Accepted by industry.

Presentation of final IP 44 Evolution-Optimization Guidelines issue 1 Document

Final document presented and rejected by industry due the addition of a “2% deviation” to the 95% confidence value.

The IMRBPB removed the 2% deviation/accuracy requirement, with the reversal of the FAA, EASA, and ANAC member’s previous position (refer to caucus minutes).

Action Item 08/06 was subsequently opened with the onus being placed on the IMRBPB to demonstrate why the 2% deviation requirement should not be contained within the evolution document.

IP 44 Action Items reviewed

MPIG (Tony Harbottle.) Gave a review of the terms to be contained in the glossary and grammatical errors within the document.

(Summary of comments)

In paragraph 5.14 “or registration” removed from document.

In paragraph 4.0 “official correspondence” needs to be contained in glossary.

In paragraph 5.3 “no defect” replaced by “no findings”

In paragraph 5.11 does “routine maintenance” mean the same in all cases? Routine will need to be in glossary.

In paragraph 6 wording change suggested, comma added after “deliberate”.

Presentation of final IP 44 evolution-optimization Guidelines issue 1 Document cont.

IP44 is now accepted and closed. And associated Evolution-Optimization Guideline issue 1 accepted.

Action Item 05/03 closed

Action Item 08/02 closed

IP 93 SMD discussed with industry now being able to go forward to cert. with IMRBPB concurrence.

EASA IP Presentations Ralf Schneider

As stated by Francis these are only presentations therefore no comments are recorded.
They will be discussed at the next IMRBPB

IP 94 (SSI Selection) – see presentation available on the EASA web site
MPIG stated that there was not enough time to review these IP's but will provide brief comments.

IP 95 (Interaction of Systems and Structure) – see presentation

IP 96 (Fluid spillage/ fluid ingress in composites) – see presentation

MRBR Approval Page

Francis proposed a common/harmonized approval page and asked how other authorities are doing this. Is there a need to mention the MSG-3 revision on the approval page? It seem FAA and TCCA have different approval letter for initials MRBR and revisons (Not closed)

IP Template

“Industry would like a block added to the IP template to reflect their position regarding the Issue Paper at hand.”

Francis addressed MPIG concerning their request for a disagreement box added to the IMRBPB Issue Paper template wherein they could record MPIG disagreement with an IMRBPB position. (See response below)

IMRPB Position: “The issue papers are for the use of the IMRBPB and any industry positions will be recorded in the minutes.”

Closing Comments:

Briefing about the Dual MRB working group to be held in Ottawa the week of October 20th, 2008 was given to the MPIG.

MPIG wants assurance from the FAA that every effort will be made to revoke the FAA 10% Memo.

FAA provided assurance that this would happen within 30 days.

Francis concluded with a review of all open IP's. and IMRBPB action items.

Everyone was thanked for his or her participation and the meeting was adjourned.