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CIP IND 2023-01 - Remote Visual Inspection (RVI)

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Background

MPIG presented “CIP IND 2023-01 - Include the use of Remote Visual Inspection (RVI) definition” during last PB in Cologne.

- The CIP intended to be simple progress step promoting GVR by adding the CSDD GVR definition to the glossary .
- Tooling equivalency/qualification are typically defined by OEM (e.g. in their documentation/manual system) not within MSG3 analyses.

The PB does generally support the introduction of “visual aids” in the context of visual inspection.

The PB position is however, that the introduction of such principles into the MSG-3 document requires more detail on the application handling (e.g. how a GVR is selected in the actual MSG-3 procedure).



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MPIG sub-team has reviewed the IMRBPB feedback

- Amend the GVI definition in the glossary to recognize the option for GVR.
- Develop an impact assessment of - from a specialist's perspective - for remote visual inspection within the logic considering the following:
 - How will the logic be applied to present, consider or select this alternative?
 - Is GVR best referred to as an alternative to existing task types versus a new task type?
 - Should the alternative be limited to GVI task types?
 - Should standard equivalency criteria (e.g. camera resolution minimums, lighting level...) be considered to guide the selection of such inspection aid?
 - Can this or other guidance support field inspectors and operators requests for approval?
 - Should this be addressed within the MSG4 proposal?



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Sub-Team proposed Way Forward

It seems that our current discussions are mixing up intent with means. The depth of the inspection, or the technique required to detect the failure/degradation is what determines the level of inspection, not the tools.

- The MSG-3 analysis does define the ICA (what needs to be inspected at what level and interval).
- The details on the task performance (in particular on potential tools used) will typically not be available at the time of the WG.
- The group further concluded that RGVI is not a new task type but a technique used when performing an GVI level inspection.

It is therefor not considered practical to incorporate RGVI in the MSG-3 analysis procedures.

According to the group position, there are principally two options:

1. Amend GVI definition in the glossary to allow the use of visual aids only
- or
2. Amend the GVI, DET and SDI definitions

Sub-Team considerations

- If one would consider the FAA AC 43.12-1B, all contents under 'Visual Inspection' would fit into GVI, DET.
- The use of drones or borescopes, for example, for GVIs, wouldn't be affected within MSG-3 if we adjust the definitions based on the FAA AC.
- The AMM task would list what are the possible means to comply with the task, to close the loop in terms of what the OEM approves in the AMM (Operators can always grant AMOCs).
- The method of compliance needs to meet the equivalency 'criteria'.
- The history background on visual aids use in inspection should be presented to the PB in May (e.g. SDI versus GVI on borescope use) to support the CIP.

Sub-Team proposed Way Forward

- Short term: create a CIP to make changes to the GVI definition to clarify that remote inspections are allowed.
- Potentially mid-term: Work with the (PB) initiative that is developing a revision to inspection level definition of GVI, DET and SDI (further to older IPs 117 and 122) and to ensure that the MSG-4 sub group is aware of our direction to remove means from the definitions.



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Does the MPIG agree and support the direction proposed by the sub-team?