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European Aviation Safety Agency

DRIVING EFFICIENCIES IN THE MRB PROCESS

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Driving efficiencies in the MRB process

- The MRB process (with MSG-3 as a tool) is de-facto the only process used internationally for large aircraft since the 1970s
- It works well in creating the most cost effective scheduled maintenance tasking information, to ensure the safe and reliable operation of aircraft
- The process is very reactive to change
- Supported by all States of Manufacture
- Voluntarily used by TCH
- All 3 involved parties provide valuable input to ensure consistency

Is all well with MRB?

- Can it be improved?
  - Seen as costly
  - Seen as burdensome, bloated and inefficient
  - Seen as slow to adapt or change the standards
  - MRBR revisions seen as being slow, especially for modifications/changes
  - MRB process being abused by some parties
  - There are time-robbers / no focus on risk
  - NAA's 100% direct involvement seen as archaic
  - Not all TCH believe they are fairly represented by the IMRBPB
  - IMRBPB makes changes without formal rulemaking activity
  - Need for closer integration of MRB and ICA activities?
  - Multiple NAAs involved in each MRBR process
  - Unclear responsibility for MRBR / IMPS / MSG-3 ownership
  - Not exhaustive list…

Example

Flight deck seat analysis A380/A350

- Same seat / same use / same assumptions
- Reviewed twice by separate WG/ISC
- Different outcomes

- Duplication
- Inconsistency
- There has to be a better way of working

Example

3 day WG meeting planned by TCH in foreign city

- Only enough actual activity for 1 day
- Supporting documents not ready
- Not clear who was driving the change

- Accusation of ‘professional tourism’
- No party complained
- There has to be a better way of working

MRB/MSG-3 is not the only way…

Some TCH have stated that if there is not a step change in improvements to the MRB processes, they could use other methods to produce scheduling information:

- TCH/DOA using MSG-3, with or without involvement of operators
- TCH/DOA showing initial xx.1529 compliance using normal certification processes (propose a certification plan; agree the NAA's LOI; provide a compliance statement for the NAA's validation)
- Changes to MRBRs done using Part-21 major/minor process
- Use of S4000P as an alternative process

What all NAAs are doing

- Applying a common standard; by introducing IMPS (International MRB Process Standard) into their own processes, which will bring about worldwide standardisation of NAAs' MRB approval processes and remove regulatory differences
- Entering into BASA agreements to reduce or remove duplication of NAA activities
- Keeping active involvement in the IMRBPB to build and maintain trust in each other

What EASA is doing

EASA will no longer tolerate unnecessary or inefficient MRB activities. We will:

- Drive efficiencies in MRB projects
- Question whether we need to be involved
- Question if meetings are required
- Question why items are being discussed/optimised and to whose benefit
- Highlight inefficiencies, unnecessary work and improvements
- Reject poor submissions
- Focus on risk, not on volume

Encourage better ways of working

All parties involved in the MRB process must drive change, to ensure it remains a valuable process:

- Only do MRB activities when it is necessary
- Use more efficient meeting methods
- NAAs involvement should be driven by risk
- TCH should be taking more responsibilities
- Point out inefficiencies, abuses, inadequacies, unnecessary delays, inconsistencies, failings….
- Drive continuous improvement

Risk based approach for Authority involvement

- TCH today indirectly control other certification activities (including ICA) through the use of TCH 'privileges', such as designees, ODA, DOA etc
- TCH are equally capable of having a similar level of delegation for MRB, without the need for high levels of NAA participation
- CIP to introduce a 'risk based approach / level of involvement' concept, allowing the TCH to use 'privileges' to do certain MRB activities without NAA involvement

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Thank you

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