



U.S. Department
of Transportation
**Federal Aviation
Administration**

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Mr. Peter Osborne
Chair, Maintenance Program Industry Group
Manager, Maintenance Programs and Planning
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Reference: Candidate Issue Paper (CIP) IND-2012-8 use of Technical Standard Order (TSO) for Task Interval Determination

Dear Mr. Osborne:

1. Advisory Circular (AC) 21-50, "Installation of Technical Standard Order Authorization (TSOA) Articles and Letter of Design Approval (LODA) Appliances", dated February 28, 2011, describes the appropriate use of data approved by the Federal Aviation Administration (FAA), through the TSOA, or TSO, LODA, by applicants seeking type certificate or approval of a change to type design under provisions of Title 14 Code of Federal Regulations. Part 21, paragraph 6 - Responsibilities for Instructions for Continued Airworthiness (ICA) of this AC describes an acceptable means for providing instructions for continued airworthiness. AC 21-50 states "The applicant may use the maintenance instructions provided under the TSOA in developing the ICA; or, may choose to develop an ICA independent of, or partially using, the TSOA maintenance instructions." The FAA agrees that this indicates using Maintenance Steering Group-3 (MSG-3) to develop ICAs of TSO parts is acceptable.
2. The MSG-3 methodology should not "ignore" TSO recommendations in the task interval determination process. The MSG-3 method should give full consideration to the TSO contents and the applicable Policy and Procedures Handbook (PPH) should clearly address this process. TSO parts and ICA data are documented as part of the MSG-3 process during working group meetings. The applicable Policy and Procedures Handbook should detail the sources of information to be used in the interval determination. As such, the TSO is one of these sources ("manufacturer's data and/or vendor recommendations"). Following the above, full consideration of the TSO data related to ICA's shall be considered during the MSG-3 process and further supports its use to develop the ICA's of TSO parts.

3. The TSO maintenance tasks and related intervals are derived from a component validation process that is disconnected from the actual application on a given airframe. Applying the MSG-3 process, when considering the whole aircraft system, will lead to effective tasks and intervals. As stated in MSG-3, revision 2011, chapter 2-3-2 Analysis procedure, "all available Vendor Recommendations (VR) should be fully considered, discussed in the Maintenance Working Group (MWG) meetings, and accepted, only if they are applicable and effective according to MSG-3 criteria." The TSO task recommendations are vendor recommendations and, as such, are based on a single component analysed by a vendor. The TSO recommendation(s) should be taken into consideration however should not over-rule the tasks and intervals determined by the industry/regulatory MWG meetings. The MWG recommendations are based upon the whole aircraft system analysis and a 30 year MSG-3 process. AC 21-50 states "The data developed by a TSOA holder is required to address the Minimum Performance Standards (MPS) defined by the TSO, and might not address all of the applicable airworthiness requirements for its installation in the type design of a product. Therefore, the TSO marking on a TSO article does not indicate that the applicable airworthiness requirements of the product on which it is being installed have been addressed." The MSG-3 process does address the applicable airworthiness requirements for the installation as well as considering the TSO data related to ICA's (vendor recommendations) which supports the use of MSG-3 to develop the ICA's of TSO parts.

4. The FAA agrees with the Maintenance Programs Industry Group (MPIG) position that TSO task and interval recommendations should be taken into consideration during the MSG-3 methodology process. As such, the FAA requests that during the next revision to ATA MSG-3, that there be included a clarifying sentence, added to the current section chapter 2-3-2, that clarifies that TSO tasks and intervals shall be considered as vendor recommendations in the MSG-3 analysis. Also, where appropriate in the MSG-3 document, it should clearly state that the applicable Policy and Procedures Handbook should detail the sources of information to be used in the interval determination and clearly state that TSO tasks and intervals shall be considered as vendor recommendations in the MSG-3 analysis.

5. In conclusion, the FAA requests that this CIP be issued as an Issue Paper (IP) because of the impact to the future revision of MSG-3, as detailed in section four (4) above.

Should you have any questions, please contact Mr. William Heliker, at telephone number (425) 917-6602 or via electronic mail at bill.heliker@faa.gov.

Sincerely,



Kenneth L. Kerzner
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