Title: Compatibility between MRB Report and Type Certification tasks

Submitter: Airbus Industrie

Issue: JAA request that there is no conflict between MRB tasks and Type Certification tasks. FAA have no concern with such conflict.

Problem: JAA request for 100% compatibility implies:

a)   all respective tasks arising from TC process are included in the Systems section of the MRB Report.

b)   all such tasks are identified as safety related (FEC 8)

c)   the MRB interval for such tasks does not exceed the interval defined by TC process.

If compatibility is not assured then a TC task may appear in the MRB report as non safety with an interval significantly greater than that acceptable for TC reasons. It is now understood that FAA require the current 'CMR ' identifier adjacent to some Systems section tasks to be deleted. It is not clear whether the IMRBPB have accepted this position.

Recommendation:

a)   It is suggested that the IMRBPB clarify that, in accordance with AC/AMJ 25 19 para 10c, MRB Report / TC task harmonisation is an <u>option</u> open to any ISC which might wish to override MSG 3 analysis conclusion in order to avoid task omission or conflict. Otherwise the task will become a CMR.

b)   IMRBPB harmonise their views on the need for an identifier against the MRB task.

IMRBPB position:

This is a certification issue. A CMR is, essentially, an airworthiness directive. A CMR is part of the type design definition. There is no regulatory or other requirement that CMR and MRB task must be the same. In addition, since CMR tasks and intervals are determined for differing purposes than the tasks and intervals of the MRBR, the proclivity to be different is pronounced

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