

***International Maintenance Review Board Policy Board (IMRBPB)***

***Issue Paper (IP)***

***Initial Date (DD/MMM/YYYY): 04 March 2013***

***IP Number: IP 134***

***Revision / Date (DD/MMM/YYYY): Rev 0, 26-April-2013***

**Title:** CMR/MSG-3 Coordination and the effects on IP-44

**Submitter:** TCCA

**Issue:** The CMR/MSG-3 coordination process currently defined in MSG-3 identifies a standardized approach for coordinating MSG-3 derived tasks with CCMRs during the Certification Maintenance Coordination Committee (CMCC). As we are all aware, the CMCC may influence the MSG-3 working group decisions as per figure 2-3-8.6 in MSG-3.

During the CMCC process one of the coordination requirements has been that the MSG-3 task interval would normally be substantially less than the CCMR interval in order to ensure that the MSG-3 task would not be escalated past the CCMR interval, which was derived by the 14 CFR 25.1309 System Safety Assessment.

In order to accommodate this coordination requirement the CMCC would normally ensure that the CCMR task interval was double the equivalent MSG-3 task interval. This gave the CMCC the required level of confidence to permit the use of an MSG-3 task in lieu of a CCMR, as it was thought that most Type Certificate Holders and Operators would not be able to double MRBR task intervals during an evolution process.

With the introduction of IP44 in 2008, Type Certificate Holders (TCH) have been provided with a methodology for evolution/optimization activities. As a result, IP44 is being used to justify increased intervals that exceed previously agreed to CMCC coordination intervals that permitted the use of an MSG-3 task in lieu of a CCMR.

This is one of the reasons why AC 25-19A currently contains recommendations to have procedures to ensure coordinated CMR/MSG-3 tasks are not evolved beyond the interval that would otherwise be required by a CMR.

**Problem:** Most TCH's who are applying IP44 are doing so on programs that have been developed prior to the introduction of IP44. In addition their CMCC meetings have been run in accordance with AC 25-19, which did not have any recommendations to have procedures to ensure coordinated tasks are not evolved beyond the interval that would otherwise be required by a CMR.

As a result MSG-3 tasks that have been permitted to be used in lieu of a CCMR task are being proposed for escalation beyond their previously agreed to CMCC interval, which in some cases exceed the original CCMR task interval.

When a CCMR interval is exceeded for a coordinated CMR/MSG-3 task Aircraft Certification will normally not allow the coordination to continue and the task must be returned to Aircraft Certification, or the CMCC, for disposition as a CMR task.

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If this occurs in a post certification environment then in order to ensure compliance with the new CMR task, and interval, an Airworthiness Directive will be required from the Certifying Airworthiness Authority. This not only has a tremendous cost associated with the TCH and Certifying Airworthiness Authority but it also creates a potential compliance issue for the Operators of the in-service aircraft.

**Recommendation (including Implementation):**

It is recommended that the following paragraph be included into Section 3.0 of IP44;

“When a TCH is applying IP44 to a maintenance program that have been developed using a CMCC coordination process based on AC 25-19 and MSG-3 revision 2011.1, or later, the previous CMCC coordinated CMR/MSG-3 tasks in the MRBR remains valid and must be respected. Therefore previously coordinated CMCC CMR/MSG-3 tasks cannot be allowed to exceed their CCMR interval unless otherwise supported by a revised SSA that would support a new coordinated CMR/MSG-3 interval.”

**MPIG proposal:**

Replace the proposed paragraph above with:

“When a TCH is applying IP44 to MRBR tasks that have been used to cover Candidate CMRs in accordance with a CMCC coordination process, the earlier CMCC decisions shall be revisited to ensure that they are not invalidated by any proposed revision to the MSG-3 task.”

**IMRBPB Position:**

**Date: April 26, 2013**

**Position: A revised proposal was developed by MPIG and accepted by the IMRBPB.**

**Status of Issue Paper (when closed state the closure date): Closed as IP134, April 26, 2013.**

**Recommendation for implementation: Revise IP44, Section 3.0, with the new recommendation for CMR/MSG-3 coordinated tasks. AI 13-10 taken to revise IP44 with the new paragraph.**

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**Important Note:** The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority.