

International Maintenance Review Board Policy Board (IMRBPB)

Issue Paper (IP)

Initial Date (DD/MMM/YYYY): 07/03/2014

IP Number: IP 136

Revision 1 / Date (29/April/2014):

Title: Standardization of the MRB Process and Harmonization of the IMRBPB Recommendations.

Applies To:	
Vol 1:	
Vol 2:	
Both:	X

Submitter: TCCA

Issue: Standardization can be defined as creating a uniform business process across various divisions or locations. Harmonization can be defined as prevention or elimination of differences in the technical content of a standard.

Decisions resulting from the IMRBPB that affect MSG-3 are adopted into MSG-3 creating a harmonized standard to be used when developing scheduled maintenance.

Decisions resulting from the IMRBPB that affect the MRB process are recommended for incorporation into MRB guidance material that is developed independently by each regulatory authority.

Problem: MRB guidance material developed by regulatory authorities is currently not completely standardized or harmonized. This is creating a need for multiple regulatory authorities to participate during initial and sustaining MRB processes in order to ensure their interpretation of the MRB process, including unique regulatory requirements, are considered.

The following are examples of current MRB guidance;

TCCA, TP 13850.

FAA, AC 121-22C.

EASA, WL.MRB.00002-001.

CAAC, AC-121/135-67.

JCAB, AC 1-317.

HK CAD HKAR-1 1.5-2

ANAC, MPR-207 (final document to be confirmed by ANAC).

Development of an IMRBPB standard for the MRB process has the potential of being harmonized with various regulatory authorities, which could be used as the basis for developing a MRB validation process. Such a validation process has many possible benefits to both the Design Approval Holder and the applicable regulatory authorities.

A harmonized MRB process standard will enable IP decisions that affect the MRB process to be updated and controlled much like the current MSG-3 document. Proposed changes would be developed by both MPIG and the regulatory authorities and then reviewed and accepted as part of the IMRBPB process, which is the same process used for the revision of MSG-3 except the MRB standard would be published by the IMRBPB and would be considered a regulatory document.

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Similar validation concepts have been developed as part of the Aircraft Certification process and are currently being used by various regulatory authorities, but their validation has not included the review of scheduled maintenance. The use of certification validation concepts has proven to be a more efficient use of resources and typically results in a more efficient certification process.

Recommendation:

The IMRBPB to develop a generic MRB process document that can be adopted by IMRBPB member regulatory authorities, as required. TCCA is recommending that the IMRBPB MRB document be developed based on the latest revision of current MRB guidance. Once developed an IMRBPB member authority could adopt the IMRBPB MRB standard as their national standard.

The development of such a document will need to take into consideration many factors such as the scope of the document (MRB process, MTB process, Manufacturers recommendations) and existing regulatory guidance. Due to the complexity of developing such a document TCCA is recommending the following next steps;

-IMRBPB Secretary to develop generic MRB process document, July 1, 2014.

-IMRBPB Members to review generic MRB process document against existing MRB guidance in order to identify commonality and differences, October 1, 2014.

-Results of the regulatory review will be discussed during the next IMRBPB Working Group Meeting in December 2014, which will result in an updated MRB process document.

-The resulting updated MRB process document will be submitted in a new regulatory CIP 60 days before the 2015 IMRBPB Meeting, including the disposition record of comments resulting from December 2014 Working Group.

The objective of such a document is to create a Policy Board MRB process standard that could be used by various regulatory authorities as the basis for their MRB guidance.

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IMRBPB Position:

Date: April 30, 2014

Position: CIP accepted by IMRBPB. CIP closed as IP136.

Status of Issue Paper (when closed state the closure date): April 30, 2014

Recommendation for implementation:

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