

International Maintenance Review Board Policy Board (IMRBPB)
Issue Paper (IP)

Initial Date: 28/Apr/2017
IP Number: IP173
Revision / Date: R0 / 28/Apr/2017

Title: MRBR Temporary Revisions Policy

Submitter: EASA

Applies To:	
MSG-3 Vol 1	
MSG-3 Vol 2	
IMPS	X

Issue:

A consistent approach for handling MRBR Temporary Revisions' reason for application, supporting documents and implementation follow-up should be identified.

Problem:

Due to continuous design evolutions and as a result of in-service experience, a scheduled MRB Report (MRBR) revision may not be feasible or possible in the required timeframe. To solve this issue some TCH created a MRBR Temporary Revision (TR) process to allow timely promulgation of tasks/intervals in those cases where the modification embodiment timescale is not compatible with the next planned MRBR revision.

Current experience highlights an inconsistent approach to the TR process between TCH, mainly in the following areas:

a. Identification of the urgent need to embody a design change / modification through an MRBR TR process

The objective of any TR is to provide applicable MRBR requirements without a full review by the MWG/ISC; for this reason it becomes crucial to properly justify the need to issue a TR.

The scope of the TR Process has been historically considered limited to the following scenario when there is insufficient time for the normal MRB process to be followed:

- 1) There is an effect on safety
OR
- 2) There is a need for implementation of new/revised tasks and/or related intervals due to significant operational / economic impact.

OR
- 3) There is a need for the TCH to comply with regulation for timely issuance for ICA at aircraft or modification delivery

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Experience shows a misinterpretation of the concept of “insufficient time for the normal MRB process to be followed”, frequently used to mitigate TCH’s lack of internal organization and proper management of the interface within its own organisation.

Example 1:

TCH1 submitted a TR for an MRBR related to an optional equipment that has not been preliminary analysed via MSG-3. The A/C with the new equipment installed is ready to be delivered to the customer. The TCH request is related to the potential missed delivery target date of the single A/C.

Example 2:

TCH2 submitted a TR for an MRBR related to the need to add a new A/C configuration. The design modification has been certified. The TCH request is related to the potential missed delivery target date of the first modified A/C.

Example 3:

TCH3 submitted a TR for an MRBR related to the need to add a new A/C configuration. The design modification had not been certified yet. The TCH request is related to the potential missed certification target date of the first modified A/C.

Example 4:

TCH4 submitted a TR to cover a major rework of the MRBR to cover retroactive regulatory & MSG3 changes. The TCH request is related to the inability to timely publish the full revision.

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b. Post TR approval, expected activities

Following the TR approval, there are some activities that are expected to take place. It is possible to find dedicated guidelines in some of the currently used regulators documents, as per the following examples:

- FAA AC 121-22C
“[...] Specifically identify and incorporate all temporary revisions during the next MRBR review process [...]”

- EASA WI.CSERV.00007-002
“[...] As the purpose is usually to provide information quickly it may be that approval can be limited to the ISC and MRB Chairperson providing the revision is subject to a full assessment at the annual review [...]”

There are several cases where the TCH did not implement the approved TR into the next full MRBR revision, based on the concept that *“a TR is applicable to the latest published MRBR revision as long as it is available through the TCH distribution channels”*. This ended in few cases where a TR has been simply transferred from one MRBR revision to the next for many years.

Furthermore, once a TR is approved, it is not common practice that the normal MRBR process is followed to ensure the subsequent review of the expedited documents, in that all changes accepted/approved in the TR must be presented at the next opportunity to an appropriate WG and/or ISC meeting.

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Recommendation (including Implementation):

In order to get an effective MRBR TR process in place, the following text should replace paragraph 4.6.9 in the IMPS document:

~~4.6.9 Temporary Revisions. If temporary revisions are needed, the TCH, ISC and MRB will coordinate in a timely manner to evaluate any proposed changes. Submit all proposed changes with supporting data to the MRB chairperson. Temporary revisions should be processed expeditiously, but in the same manner as outlined for the MRBR approval/non-approval process. Specifically identify and incorporate all temporary revisions during the next MRBR review process. If the need for a temporary revision arises while the NAA is reviewing an MRBR revision proposal, the MRB chairperson should review the temporary revision and decide if it should be incorporated in the major revision (which would require that the major revision be returned to the TCH for incorporation) or may be incorporated during the next major revision cycle.~~

If temporary revisions are needed, the TCH, ISC and MRB will coordinate in a timely manner to evaluate any proposed changes.

4.6.9.1 TR usage

4.6.9.1.1 When there is an effect on the current operating fleet, TRs can only be used for the following two reasons:

- There is an effect on safety, and publication cannot wait until the next planned MRBR revision and/or the normal WG/ISC approval process has not been followed.

OR

- There is a need for implementation of new/revised tasks and/or related intervals with significant operational / economic impact and either publication is desired before the next planned MRBR revision or the normal WG/ISC approval process has not been followed.

The “significant operational/economic impact” should be evaluated by the TCH based on the benefits of the new MRBR task immediate application compared to the existing MRBR task.

The TR approval process should be expedited, with approval by the regulatory authorities expected within 15 calendar days after receipt of the TR and supporting documentation.

4.6.9.1.2 When there is no effect on the current operating fleet

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There is the need for the TCH to comply with regulation for timely issuance of ICA at aircraft delivery, and either the publication cannot wait until the next planned MRBR revision and/or the normal WG/ISC process has not been followed.

The TR approval process should be expedited, with approval by the regulatory authorities expected within 30 calendar days after receipt of the TR and supporting documentation.

This scenario should be used on an exceptional basis.

In the particular case of the need for a TR, while the MRB is reviewing a MRB Report revision proposal, the CA MRB chairperson should coordinate with the VAs (as applicable) and decide if the proposed TR should be incorporated in the revision (which would require that the revision be returned to the TCH for immediate incorporation) or may be incorporated during the next MRB Report revision cycle.

4.6.9.2 Post TR activity

Unless the TR content followed the normal WG/ISC approval process, the following should be initiated by the TCH:

- the complete TR dossier should be reviewed by the appropriate WG at the first WG meeting opportunity (if any WG activity is still in place for the specific program),
or
- if no WG activity is in place for the specific program, the complete TR dossier should be presented at the next ISC or periodic review meeting.

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IMRBPB Position:

Date: 28/Apr/2017

Position: IMRBPB agrees to CIP EASA 2016-02 with the changes implemented at the IMRBPB Meeting 2017, which becomes IP173

Date:

Position:

Status of Issue Paper and date:

Active 28/Apr/2017

Recommendation for implementation:

IP173 will be included into the next revision of the IMPS document

Retroactive: YES

- PPH update for existing programmes
- Perform 'post TR activity' on existing TRs in accordance with the revised PPH

Important Note: The IMRBPB IPs are not policy. An IP only becomes policy when the IP is adopted into the processes of the appropriate National Aviation Authority. However, before formal adoption, the IP content may be incorporated by the MRB applicant on a voluntary basis with the agreement of all parties as detailed in the program PPH.