

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

Initial Date: 5 Apr 2018

IP Number: CIP IND 2018-01

Revision / Date: 0 / 5 Apr 2018

Title: Efficiency in the MRB process – Delegation to the TCH

Submitter: Airbus Commercial Aircraft

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

Issue: The MRB process and its use of MSG-3 methodology is recognised as being a mature, well established and generally efficient means to define initial scheduled maintenance requirements. TCHs, operators and regulators are now more and more focusing on means to further improve efficiency in the processes in which they contribute. Enhancements could be made to MSG-3 and the IMPS to address commenters who claim that the process is not adapted to the agile culture demanded in today's industry.

Problem: The MRB process and MSG-3 logic have been used by several TCHs for years (over thirty for some). A certain level of maturity has been gained, which may give the necessary confidence to allow some well-defined activities to be performed without direct Operator and/or Regulator participation. An ISC and MRB may be willing to delegate some responsibility to the TCH to reduce the need for their direct involvement where their added value is considered low. Unfortunately, the IMPS and MSG-3 documents are not today providing this opportunity.

Recommendation (including Implementation):

It is proposed to add text in the MSG-3 and IMPS documents to provide flexibility for reduced participation of Operators and Regulatory Authorities in the application of MSG-3 logic. The level of participation shall be agreed between all three parties. The ISC remains responsible for acceptance of the full set of recommendations prior to submittal to the MRB for approval. This provision allows resources to be used effectively and where the involved parties provide added value.

In MSG-3:

1-3. Organization

The organization to carry out the scheduled maintenance development for a specific type aircraft shall be staffed by representatives of the airline operators purchasing the equipment, the prime manufacturers of the airframe and powerplant, and the Regulatory Authority. **The extent of the involvement of operators and the Regulatory Authority will be determined at the level of the aircraft type in agreement with all parties. A process shall be developed as necessary and referenced to ensure that the work performed without operator and/or regulator involvement is controlled appropriately by the ISC Chair, ISC Co-Chair and MRB Chair. This process shall be accepted by the Regulatory Authority and documented in the PPH.**

1-3-1. Industry Steering Committee

The management of the scheduled maintenance development activities shall be accomplished by an **Industry Steering Committee** composed of members from a representative number of

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operators and representatives of the prime airframe and engine manufacturers. It shall be the responsibility of this committee to establish policy, set initial goals for scheduled maintenance check intervals, direct the activities of working groups or other working activity, carry out liaison with the manufacturer and other operators, prepare the final recommendations and represent the operators in contacts with the Regulatory Authority. The ISC should see that the MSG-3 process identifies 100% accountability for all **Maintenance Significant Items (MSI's)** and **Structural Significant Items (SSI's)**, whether or not a task has been derived from the analysis.

The ISC should advise Maintenance Working Groups (MWG) to fully consider available Vendor Recommendations (VR), and accept them only if they are applicable and effective according to MSG-3 criteria.

The ISC will determine the extent to which operators participate in the application of MSG-3. A level of participation may be defined that allows resources to be focussed on analyses where operator contribution adds most value. This level must be documented and agreed by the Regulatory Authority.

1-3-2. Working Groups

One or more Working Groups, consisting of specialist representatives from the participating operators, the prime manufacturer, and the Regulatory Authority, may be constituted. The Industry Steering Committee, alternatively, may arrange some other means for obtaining the detailed technical information necessary to develop recommendations for scheduled maintenance in each area. Irrespective of the organization of the working activity, written technical data must be provided that supports its recommendations to the Industry Steering Committee. After approval by the Industry Steering Committee, these analyses and recommendations shall be consolidated into a final report for presentation to the Regulatory Authority.

Where Working Groups are constituted, related technical information shall be distributed to all members but the extent to which they review and provide technical input to MSG-3 analysis proposals may be defined by a level of participation agreed by the ISC and the Regulatory Authority. Any member may submit objections or concerns on analyses not subjected to Working Group review to the ISC Chair.

2-2. Divisions of MSG-3 Document

The working portions of MSG-3 are contained in the next four (4) sections. Systems / Powerplant, including components and APU's, are considered in [Section 2-3]. Aircraft Structures is considered in [Section 2-4], Zonal Inspections in [Section 2-5] and L/HIRF is considered in [Section 2-6]. Each section contains its own explanatory material and decision logic diagram (as appropriate); therefore, it may be used independently of other MSG-3 sections.

Where reference is made to the duties of Maintenance Working Groups within § 2.2, it shall be understood that these may be a pure TCH responsibility if it has been agreed with the ISC and MRB that the participation of operators is unnecessary in that particular analysis (see §1.3.2). In this case the TCH must develop and document a validation process acceptable to the Regulatory Authority that mitigates the absence of operator specialist validation.

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In IMPS:

4.3.4 In conjunction with the TCH, the ISC Chairperson is responsible for directing the activities of the working groups and preparing the MRBR. **The extent of operator participation shall be agreed by the ISC Chairperson and ISC Co-Chairperson. The PPH shall record the level of participation and the process to validate analysis conclusions that are made without direct operator involvement.**

4.3.10 The ISC should review and accept all final **WG** analyses conclusions and presentations, returning those that are unacceptable back to the **WG or TCH as applicable** with the rationale for not accepting the final analyses.

IMRBPB Position:

Date:

Position:

Date:

Position:

Status of Issue Paper and date:

Active

Recommendation for implementation:

Include in 2018 revision to MSG-3 and IMPS documents to allow TCHs to discuss efficiency enhancements with MRBs and ISCs at the level of the aircraft type.

Retroactive: N.

A TCH may however optionally revisit MRB/Operator participation requirements for existing as well as new programs.

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.