

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

Initial Date (15/Feb/2018):

IP Number: CIP EASA-2018-01

Revision / Date (DD/MMM/YYYY):

Title: Task Data as part of the MSG-3 Dossiers

Submitter: EASA

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

Issue:

Although information regarding the accomplishment of selected MRB R tasks can significantly add value, ATA MSG-3 does not formally recommend the development of a Task Data sheet as part of the MSG-3 dossiers. The use of such task data sheet is therefore not harmonized amongst the OEM/TCHs.

Problem:

As part of the MSG-3 Logic-Analysis, the Maintenance Working Group (MWG) has to select scheduled maintenance tasks that satisfy both the applicability & effectiveness criteria. As such information related to the task accomplishment (main steps of the procedure, accesses, tool/GSE equipment, estimated manhours/elapsed time...) are necessary to ensure that all failure causes are addressed and the cost effectiveness is assessed.

In addition as recommended by the IMPS (refer to §3.7), the type certificate holder has the responsibility to develop a methodology to validate the maintenance procedures written to support the completion of MRBR tasks. The objective of the validation is to ensure the maintenance procedure can be performed and that the intent of the MRBR task is also complied with. However, an on-aircraft validation exercise based on AMM procedures allows the evaluation of the feasibility of the task but neither the intent of the task nor the applicability & effectiveness criteria are really checked.

Today, some manufacturers have integrated in their PPH a task data sheet which provides information related to the task accomplishment. But as ATA MSG-3 does not formally ask for such a sheet, it is not uniformly used. As such detailed rationales supporting the task selection and the intent of the task are not properly tracked and might be misunderstood.

The experience has shown, especially at the opportunity of evolution exercises, that some procedures actually performed on aircraft were not matching the task selected by the WG (e.g.; operational Check vs functional Check, visual check vs inspection, restoration vs functional check...). In addition to the possible issues related to the deviation from the manufacturer recommended maintenance requirements, this inconsistency might jeopardize the optimization of maintenance tasks as some collected data are irrelevant.

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Recommendation (including Implementation):

A task data sheet as part of MSG-3 dossiers should be considered as a standard and included in all PPHs. To meet that objective and to ensure a consistent approach, the recommendation should be formalized in the IMPS and in MSG-3.

The purpose of such a data sheet should be to:

- Ensure the necessary traceability of the applicability and effectiveness criteria,
- Ensure a common understanding of the intent of the task and keep record of it,
- Use the operator's experience for the review of the information related to the task accomplishment,
- Ensure the development of consistent ICAs,
- Ensure the collection of relevant data to support a future evolution exercise.

Notes:

- It is not the objective of the task data sheet to supersede the AMM procedure as only raw data are expected. The level of details should only allow the MWG to get a clear idea of the steps necessary for task accomplishment and to support the assessment of the effectiveness of the task. It should also allow the Tech Pub department to develop the associated detailed procedure that comply with the intent of the MWG.
- In addition, although a task data sheet should be considered as source data to develop the associated AMM procedure, the AMM procedure or its subsequent revisions should not systematically trigger a revision of the related task data sheet. A change to the task data sheet should only be considered when it is shown that any information contained in the procedure might impact the selected task and needs to be assessed by the MWG (e.g.; impact on the effectiveness of the task).

The following amendments are recommended:

In IMPS:

§3.7

The type certificate holder has the responsibility to develop a methodology to validate the maintenance procedures written to support the completion of MRBR tasks. The objective of the validation is to ensure the maintenance procedure can be performed and that the intent of the MRBR task is also complied with. *To meet that objective, the TCH should provide sufficient data in the MRB R supporting documentation to ensure a clear understanding of the applicability and effectiveness criteria of the task.* The results of the validation shall be made available to the CA or VA upon request. If task validation finds that the intent of the MRB task cannot be met, this should be fed back to the ISC. They should review the analysis for possible errors and correct as required.

In MSG3:

2-1-2. Approach

3. Method for Scheduled Maintenance Development

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This document describes the method for developing the scheduled maintenance. Non-scheduled maintenance results from scheduled tasks, normal operation or data analysis.

Scheduled maintenance will be developed via use of a guided logic approach and will result in a task oriented program. The logic's flow of analysis is failure-effect oriented.

As part of the Scheduled maintenance development procedures, maintenance requirements will be only selected if they meet the applicability and effectiveness criteria as defined in this document. Information such as task purpose, accesses, tools/GSE, main steps of the procedure, Estimated Elapsed time/Manhours, pass/fail criteria, ...are essential to the MWG to support their decision in getting a clear idea of the proposed tasks to be performed.

Items that, after analysis, have no scheduled task specified, may be monitored by an operator's reliability program.

Assumptions made during the analysis, that can result in a change to the analysis, are to be recorded.

- Assumptions applying to the program as a whole, and not only to an individual MSG-3 analysis, are to be documented in the appropriate "Policy and Procedures Handbook" or "User's Guide." As a minimum, this applies to statements concerning anticipated average annual utilization, the environments to be considered, and the operating capabilities to which the aircraft/powerplant is certificated.
- If an analysis is (partially or as a whole) based on design solutions not completely frozen, this should be recorded in the analysis.

IMRBPB Position:

Date:

Position:

Date:

Position:

Status of Issue Paper and date:

Active

Incorporated in MSG-3 / IMPS (with details)

Archived

Recommendation for implementation:

Retroactive: Y/ N

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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.