

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

Initial Date: 25 Jan 19

IP Number: CIP IND-2019-03

Revision / Date: 01 / 6 Mar 19

Title: Exempt FEC 7 Tasks from IP-44 Process

Submitter: Boeing, Lockheed Martin

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

Issue:

Current guidance does not provide TCHs flexibility regarding FEC 7 tasks (Economic). The reality is that many operators may not have sufficient data under the rules of IP-44 to substantiate interval changes or task deletion for an economic task that may not be economically effective at any interval.

By definition, FEC 7 tasks have no impact on aircraft safety or operational reliability, yet once established as part of the MRBR, are subject to the same constraints for optimization as all other tasks. In addition, the establishment of FEC7 tasks and intervals by the working group may be limited due to the few perspectives that are represented in the WG. In reality, economics are highly dependent on considerations such as:

- Operator Capabilities
- Abundant Labor
- Economies of Scale
- Operating Environment
- Aircraft Utilization

Problem:

Given, the significant differences in maintenance costs among operators, it is not possible for the WG to establish task intervals that consider the economic factors of all operators. In addition, it can easily be true that certain FEC 7 tasks may not be economically advantageous for some operators at any interval. The ability of the operator to effectively manage their maintenance program specifically FEC 7 tasks is inhibited by IP-44 constraints.

Recommendation (including Implementation):

Based on the above problem statement, MPIG proposes that TCHs be exempt from optimizing FEC 7 tasks and instead allow each operator to optimize based on their local economic conditions. For this recommendation to take effect, MPIG proposes revising IP44, para 5.7 as follows:

IMPS:

5.7 Failure Effect Category Considerations (Revised)

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MRBR task interval optimization is based on principles that reflect the criticality, reliability or economic impact on of airplane systems, and components identified during MSG-3 analysis. Failure Effect Categories (FEC) should be accounted for during the analysis. Since FEC 7 tasks were only considered “effective” due to economic considerations, these tasks are exempt from the IP-44 or local regulatory guidance for optimization process. Each TCH and/or operator may use other alternative means to delete or revise FEC 7 tasks and intervals.

IMRBPB Position:

Date:

Position:

Status of Issue Paper and date:

Candidate

Recommendation for implementation:

Retroactive: N

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