International Maintenance Review Board Policy Board (IMRBPB)

Issue Paper (IP)

IP Number: IP 191

Initial Date (DD/MMM/YYYY): 28/May/2021

Revision / Date (DD/MMM/YYYY): Rev. 0 / 28/May/2021

Effective Date (DD/MMM/YYYY): 27/Jul/2021

Retroactivity (Y/N): N

Title:	IMPS - Certification Review Item	Applies To:	
		MSG-3 Vol 1	
		MSG-3 Vol 2	
Submitter:	MPIG	IMPS	X

Issue:

In respect to bilateral agreement, whatever for which authorities the MRB Chairpersons belong, their responsibilities should be equivalent.

For information, here below an extract from "TECHNICAL IMPLEMENTATION PROCEDURES FOR AIRWORTHINESS and ENVIRONMENTAL CERTIFICATION" between the Federal Aviation Administration of the United States of America and the European Aviation Safety Agency of the European Union, Revision 6 - September 22, 2017:

3.5.10.3 Use of CRI's and IP's

- (a) The VA may use CRIs or IPs, as applicable, to fully develop and document resolution of each of these applicable criteria.
- (b) The VA will not generate an IP or CRI on a subject which has already been addressed by the CA, if applicable to the validation, and with which the VA concurs. The VA will use the work plan to document decisions to rely on the CA IP or CRI in these cases.
- (c) The VA will coordinate IP's or CRI's through the CA to the applicant in order to expedite a mutually acceptable resolution with the awareness of both Authorities.
- (d) VA intention to raise IP or CRI, as applicable, must be documented in the work plan and approved by VA management.

Additionally, to the exposed issue, it appears that there could be confusion between IMRBPB Issue Paper and Certification Issue Paper.

Problem:

Some TCHs may understand that the term 'issue paper' used in IMPS para 4.1.5 refers only to the FAA's 'Issue Paper' and thus may not also take into account equivalent documents issued by other Authorities / Agencies, e.g. Certification Review Items (CRI) issued by EASA. Consequently, instead of adding the different names/acronyms of Certification Issue Paper depending the Authorities involved, a simplification is proposed to avoid these misunderstandings.

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Recommendation (including Implementation):

Update IMPS document as follow:

4.1.5 The MRB Chairperson is responsible for coordination on all issues of concern with the CA Certification Branch. This may require developing issue papers and responding to certification issue papers or seeking consultation on new technological issues that may arise during the design and development process of the aircraft. The MRB Chairperson should ensure standardization and harmonization of the MRB processes and associated activities with the international MRB process.

NOTE: The original CIP proposal was submitted by Airbus and Dassault-Aviation.

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IMRBPB Position:				
Date:	28 May 2021			
Position:	Agreed, closed in 2021 meeting as IP191			
Recommendation for Implementation:	As per effective date			
Status of the Issue	X	Active		
Paper:		Incorporated in MSG-3 / IMPS (with details) Archived		