

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

***Initial Date:*** 15-Feb-2013

***IP Number:*** IP 127

***Revision 0 / Date:*** 25 April 2013

**Title:** Enhancement to Letter of Confirmation

**Submitter:** MPIG (drafted by Airbus)

**Issue:** IP83 introduced the 'Letter of Confirmation' in March 2009. This is used by the host NAA to clarify working arrangements with the guest NAA(s) who will subsequently approve the MRB Report.

**Problem:** TCHs have observed inconsistent application of IP83. This may be partly due to insufficient guidance concerning the protocols to be adopted between the "host" and "guest" NAAs at both ISC and MWG level. These inconsistencies have led to contradictory feedback to the ISC Chair/CoChair with consequent difficulty for the host NAA to coordinate a timely and complete MRB response to the applicant

**Recommendation (including Implementation):**

MPIG requests that the template 'Letter of Confirmation' is enhanced with the addition of the following bullets:

Following an ISC meeting, "Guest NAA" MRB members shall write any concerns that they may have with the conclusions of discussion on PPH or MPP content to the "Host NAA" MRB Chairperson within two weeks of the meeting. The "Host NAA" will review these comments and discuss with the "Guest NAA" as necessary before providing a consolidated set of comments to the applicant. This set shall clearly identify any comment that is specific to one or more NAA. Otherwise all comments shall be considered as supported by all signing NAA.

Following a WG meeting, "Guest NAA" MRB advisors shall write any concerns that they may have with the WG decisions relating to MSG-3 analyses to the "Host NAA" MRB advisor within two weeks of the meeting. The "Host NAA" will review these comments and discuss with the "Guest NAA" MRB advisor as necessary before providing a consolidated set of comments to the applicant. This set shall clearly identify any comment that is specific to one or more NAA. Otherwise all comments shall be considered as supported by all signing NAA.

After full agreement has been reached on the content of the MRB Report, the "Host NAA" MRB Chairperson shall liaise with each signing NAA to agree the approval date that will appear on each Approval Letter. No Approval letter shall be provided to the applicant until all signing NAA are ready to give their approval.

The MRB Report will be published only after receipt of all signed Approval Letters. Timely approval by "Guest NAA" is expected by the "Host NAA". The "Guest NAA" shall anticipate potential delays within their internal approval process and develop means to mitigate the risk that approval is not granted on time despite agreement of "Guest NAA" MRB member.

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In addition to the above mentioned bullets, MPIG highlight a general concern regarding the paragraphs within the existing 'Letter of Confirmation' that relate to a potential need for an appendix to the PPH to address NAA regulatory differences.

The background to this text is understood and MPIG acknowledge that it is unlikely that such an appendix will be needed. However, the potential for such differences requires applicants to develop methodology, including software, to allow them to address a situation that might require more than one version of each MSG-3 analysis. The practicality of this is now questioned and thus MPIG request that the wording is changed to require that any regulatory differences that might lead to multiple versions of an MSG-3 analysis are raised at the level of the NAA MRB management teams for resolution.

**IMRBPB Position:**

**Date: April 25, 2013**

**Position: IMRBPB will review this IP and update the Letter of Confirmation.**

**Status of Issue Paper (when closed state the closure date): Closed as IP 127 April 25, 2013**

**Recommendation for implementation: This IP will supersede IP 83 and is applicable to all MRB processes.**

**Important Note:** The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority.