

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

Initial Date: 07/Jan/2014

IP Number: IP 146

Revision0 /Date 22/Apr/2015

Title: Recording Vendor Recommendations - Task Interval Consistency

Submitter: Brent Bringle (FAA) and Allan Howell (TCCA)

Issue: Task intervals are published in the MRBR in many different formats by the use of the acronym “VR” or “Ven Rec” (Vendor Recommendations) instead of an actual interval expressed in hours, cycles or calendar time in the MRBR. MSG-3 allows a VR to be considered when determining a possible task interval when it is applicable and effective, but does state to publish the correct usage parameter and its associated numerical interval. The use of the term VR or Ven Rec amongst the various OEM’s instead of an actual interval selection interval expressed in hours, cycles or calendar time may allow the amendment of the interval by an outside party without the knowledge or consent of the MRB/ISC and would not be appropriate in accordance with MSG-3 guidelines.

Applies To:	
Vol 1:	
Vol 2:	
Both:	

Example 1: Embraer 170/190: MRBR does not use VR rather it spells out the Manufactures Intervals and other Embraer product lines use VR intervals and places them in an Appendix Section 8.7.

Example 2: B-757: MRBR interval columns are addressed in three different formats; “NOTE”, “3YR NOTE” and “VEN REC NOTE”

Example 3: Falcon 7X: MRBR interval column “as per vendor recommendation” and other product lines specify the number of months in the interval column.

Example 4: A-330: MRBR interval column states, “VR without intervals”, “VR Note 8” or “VR or NR”

Problem: When an actual interval is not expressed in hours, cycles or calendar time in the MRBR, but instead the term “VR or Ven Rec” is used, the onus is put on the operator to research the interval from the vendor for use in their maintenance program. These intervals may be contained in various source documents (such as TSOs and CMMs) which can be subject to an amendment. The MRB/ISC has no control of this interval. The vendor now has the ability to change the interval after it has been considered in the development of the original analysis for the MRBR, without the knowledge of the MRB/ISC.

This can undermine the working group and ISC decision regarding the interval determination. Also, intervals (when adopted for use in the MRBR) are regulatorily approved, and any subsequent changes must also go through the MRB process.

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Recommendation (including Implementation):

Establish a policy (in NAA guidance) that when a vendor recommendation is selected as a task interval in the MRB report, the OEM/TCH should either publish the vendor recommendations as actual intervals expressed in hours, cycles, calendar time (or other relevant exposure unit) in the interval block; or have the MRB report incorporate a separate Appendix for vendor recommendations. The Appendix would list the part numbers and vendor recommended intervals for each applicable task, and the main MRBR would state "See Appendix" in the interval column. Changes to the vendor recommended intervals would be accepted as per MSG-3 criteria and incorporated as part of the normal MRBR revision process.

IMRBPB Position:

Date: April 22, 2015

Position:

Recommendation accepted by the IMRBPB without change. Closed as IP 146

Status of Issue Paper (when closed state the closure date): Closed on April 22, 2015.

Recommendation for implementation: To be implemented in the IMRBPB MRB Process Standard.

Retroactive: N

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