

JAA/FAA/TCCA
International MRB Policy Board
Issue Paper

Date 19 July 2004
IMRBPB #077

Title: MRB Report Task Description

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Issue: The MRB Report was supposedly developed to document all initial individual tasks originating directly from each MSG-3 analysis. Clarification is requested from the IMRBPB regarding their position/policy defining specifically how and when several different categories of tasks may be grouped/combined into one composite task and the disposition of the resulting task i.e. either within the MRBR or MPD.

Problem: There has been an increasing tendency for the Original Equipment Manufacturer (OEM) to combine or bundle various unrelated MSG-3 type task i.e. an Operational Check, General Visual Inspection, Detailed Inspection and Discard into one composite task. This is done regardless of MSG-3 type task, interval, failure effect category or description.

In most cases, there is evidence of the lack of traceability back to the origination of the initial MSG-3 data describing each individual element the composite task. This creates a future problem when an operator wants to unbundle a task due to operational reliability issues related to part of the task or to improve the efficiency and effectivity of the maintenance program. Neither the Operator or the Principal Regulator Authority at the time will have any background nor data related to each independent element of the composite task to successfully and correctly uncouple such a task.

When requested, OEM's encounter difficulty providing data for these composite tasks due to internal cumbersome numbering systems used to trace the original MSG-3 analysis task to the composite MRBR task. There is no current means in the MRBR for providing positive traceability from each original independent MSG-3 task to the composite task.

OEM's have been contacted by operators for information of this issue, only to suffer long delayed response or ultimately be informed by the OEM that no information is available. The Principal Regulatory is subsequently forced to deny separation of an OEM bundled task due to the lack of historical data.

OEM's report tasks must be combined to reduce the ever growing number of tasks developed through MSG-3 analysis. Consequently, it is also reported that these combined tasks must be recorded in the MRBR to receive official regulatory approval, since the MPD is not an approved document.

With the advent of the new high technology A380 and B7E7 there is an urgent need to resolve this situation before either of these aircraft become certified and enter service.

Recommendation:

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If this process is to be considered acceptable, to be manageable, there must be some basic harmonization and standardization developed by industry, in conjunction with the regulatory authorities, immediately, to preclude all the problems reported in this issue paper.

There is no current IMRBPB, Regulatory Authority or ATA policy/procedures to govern combining any MSG-3 tasks and the recording of such composite tasks within the MRBR. It is requested that the IMRBPB release policy to expedite the resolution of this issue. This guidance should also consider how to deal with past as well as future composite task conditions.

IMRBPB Position:

Sept 2004

Grouping of different tasks (GVIs, DIs, and SDIs combined into one task)

Example:

Operational check of manual RAT deployment followed by Functional Check of RAT operation and Inspection of filter element by reference to differential pressure indicator.

It is the position of the Regulatory/Industry WG that this practice is acceptable for new aircraft systems, provided there is a documented and auditable system to ensure traceability of the individual tasks. For legacy aircraft this practice is unacceptable unless the OEM has fully documented procedures for traceability that is acceptable and available to the NAAs. These procedures must be described in the program rules portion and the traceability document is included as an appendix to the MRBR.

Issue Paper closed

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority. (JAA/EASA, FAA or TCCA)