**Title:** Restoration / Remove & Replace tasks

**Submitter:** DASSAULT AVIATION

**Issue:** A joint Regulatory / Industry group (MDM.056) has been gathered by the EASA to issue guidance on the Instructions for Continued Airworthiness (ICA) and to ensure that this guidance is harmonized as much as possible (Regulatories attending the meetings are EASA, FAA, TCCA).

One of issues that was raised relates to the Vendors documentation, mainly CMMs. The conclusions of the group on this subject are that the CMMs that are quoted in any ICA (for example MRB R or MPD or AMM) are considered as ICAs, the other ones are not. These conclusions are consistent with the interpretation given in the existing FAA Order 8110-54A which states:

"If top-level ICA contains “remove and replace” instructions for certain components, and don’t refer to CMMs or specific repair procedures for necessary airworthiness actions, then the:

• Aircraft can maintain its airworthiness by replacement action, and

• CMM or repair documentation is not part of the ICA. "

**Problem:** The MRB Report cannot contain "remove and replace" instructions as suggested above by the Regulatories.

There are several task types authorized by the MSG-3 that may need sending the components to a repair shop. The main one is "Restoration" (RST) but Functional Check (FNC) can also lead to a shop maintenance task.

Therefore presently the TCH cannot have only "Remove and Replace" tasks in their ICAs, unless they change the Restoration (or FNC) tasks of the MRBR into "remove and replace" tasks under their own responsibility. But this change could be challenged by the Regulatory as not totally equivalent to the Restoration (or FNC) task identified in the MRBR.

On the other hand this IP does not recommend eliminating from the MRB Report any workshop (off-wing) task, contrary to what was proposed in IP106. This would be losing a valuable output of the analysis and operators need to know what is required during the workshop visit to satisfy the MRB minimum requirements

This IP proposes

* to keep the requirement of MSG-3 § 2.3.7 -4. (“Since Restoration may vary from cleaning or replacement of single parts up to a complete overhaul, the scope of each assigned restoration task has to be specified”) so that the MRB Report is still detailing the restoration tasks.
* And to add to the §2.3.7 the "Remove and replace" wording so that TCH can legally produce ICAs consistent with the ICAs definition per FAA Order 8110-54A and future EASA Guidance Material.

**Recommendation (including Implementation):**

**In MSG-3**

**2-3-7. Task Development (Second Level)**

Task development is handled in a similar manner for each of the five Effect categories. For task determination, it is necessary to apply the failure causes for the functional failure to the second level of the logic diagram.

Each task has to be identified in the analysis and in the MRB Report with one of the six types of tasks as stated below.

NOTE : In addition, tasks that are accomplished at shop level may be identified as a "Remove and replace" task at aircraft level.

There are six possible task resultant questions in the Effect categories as follows

**1. Lubrication/Servicing (All Categories)**

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**IMRBPB Position:**

**Date:**

**Position:.**

**Status of Issue Paper (when closed state the closure date):**

**Recommendation for implementation:**

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