

Updated CIP – 2023-05 Rev. 1 - Latent use of the term “Overhaul”



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MPIG Overview CIP Responses to “CIP EASA 2023-04” per 2023 IMRPBP meeting

Clarifications on the policy of “off-wing”, overhaul and restoration tasks

**CIP 2023-05 Revised to address comments and suggestion
proposed during 2024 IMRBPB**



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CIP DEVELOPMENT BY MPIG

Three CIPs have been developed to address issues raised and agreed upon to address CIP 2023-04:

1. CIP IND 2023-04 Definition “Off-aircraft” -CLOSED

2. CIP IND 2023-05 Latent use of the term “Overhaul” - Under Revision

3. CIP IND 2023-06 MRBR Tasks ICAs CMM Policy (Rev 7) - CLOSED



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GENERAL OVERVIEW – REVIEW OF IMRBPB 2023

The CIP EASA 2023-04 identifies several issues of significance:

- There is **lack of clarity** of the term “off-wing”, overhaul and restoration task collectively.
- The issue statements points to consolidation of **different task** into “**off-aircraft restoration**” implying packaging.
- The issue statement reflects on the usage of the wording “**complete overhaul**” currently published in MSG-3. The paper goes forward to recommend that the **philosophy of “overhaul”** be reintroduced into MSG-3 by adding a glossary definition for overhaul.
- The problem statement reflects on unique ICA development issues on aircraft platforms related to the classification of parts removed per ICA as **restoration task**, to include a link to CAA release certificates, while comparing the AIMM to the CMM.
- Off-aircraft task are an **automatic restoration classification**, even when items are not restored.

Background Info

The presentation of *CIP EASA 2023-04* had the following outcome:

CIP EASA 2023-04 – recommendations [not accepted](#) to integrate into MSG-3

Implementation:

1) MSG-3 Revision 2018.1, Volume 1 – Fixed Wing Aircraft

- Amend the VR statement in Chapter 2-3-2
- Add a note to the L2 Restoration Chapter 2-3-7.5
- [Add "Overhaul" to the Glossary \(Appendix A\)](#)

CLOSED

*CIP IND 2023-05 Latent use of the term
“Overhaul”*



Significant Points:

1. The term “**complete overhaul**” is used **twice** without qualification to its intent within the MSG-3 methodology to mitigate specific failure causes.
2. The word overhaul is not used in the IMPS document.
3. The schedule maintenance development process transitioned from MSG-2 to MSG-3 completely **eliminating** the hard time philosophy and the maintenance **methodology of overhaul**, as a maintenance practice to mitigate functional failures.

Significant Points:

4. Industry has **various definitions to define the type of work**, not the detail, to be completed on an item, however not directed to any specific failure modes related to aircraft design or specific functions.
5. In example the FAA does not provide a definition for the word “overhaul” in its definitions Title 14 Part 1
6. Overhaul documents were intended to satisfy the development of ICA's to meet regulatory requirements for commercial parts (i.e., LRU's, supplier components). The vast majority of such commercial parts receive TSO certification, or for engines and propellers a Type Certificate certification.



Significant Points:

7. Today's typical industry standard terminology for LRU supplier component ICA's is referred to as document titled Component Maintenance Manual (CMM).
8. MSG-3 logic processes have not historically been used by suppliers/vendors to develop their ICA requirements to meet certification standards. This can result in a situation where the supplier/vendor ICA's, overhaul or CMM task, have no alignment with the task intent of MSG-3 developed tasks in the MRBR.

Significant Points:

- As the industry still has references and uses the word “overhaul” outside of MSG-3 there remains the possibility a link between the MRBR and supplier/vendor ICA “overhaul” documents may exist.
- The relationship which is possible, is when the MRBR task(s) can meet the requirements of an “overhaul” work scope for an LRU. This could result in a compliance statement of the LRU being “overhauled”, after completion of the MRBR task(s), per the supplier’s source documents (i.e., overhaul manual, CMM).
- However, ever it is important when completing scheduled maintenance regulatory compliance statements that the MRBR specific task(s) tracking numbers be annotated in the compliance statement record. The compliance reference to the supplier/vendor source document (i.e., complied with overhaul manual XXX) would not allow for MRBR task(s) compliance tracking.



Significant Points:

The CIP revision now reflects on the term “overhaul” in a manner as such:

Compliance with MRBR task(s) may meet the requirements of an “overhaul”,

...however compliance with an “overhaul” will not ensure compliance with MRBR task(s).



Significant Points:

The CIP has two recommendations of two textual changes:

- 1.) **Recommendation (including Implementation):**
MSG-3 next revision, replace the text as indicated below in two locations, 1.) Chapter 2-3-7 para. 5 and 2.) Glossary:

Chapter 2-3-7 para. 5 below:

Current text:

5. Restoration (All Categories)

QUESTION 5C, 6C, 7C, 8D, & 9D. IS A RESTORATION TASK TO REDUCE FAILURE RATE APPLICABLE AND EFFECTIVE?

~~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.~~

Replace with:

Since Restoration may vary from cleaning, replating, and/or replacement of single or multiple component parts, or other maintenance actions the scope of each assigned restoration task has to be specified. The scope is defined to meet the requirements of 2-1-2 paragraph 3. “Method for Scheduled Maintenance Development”. A “restoration” task(s) may meet the requirements of a component (i.e., LRU) **“overhaul”**.



Significant Points:

The CIP has two recommendations of two textual changes:

2.)

Glossary change below:

Current text:

Restoration

~~That work necessary to return the item to a specific standard. Restoration may vary from cleaning or replacement of single parts up to complete overhaul.~~

delete

Replace with:

Restoration: That work necessary to return the item to a specific standard of failure resistance. Task(s) scope may vary from cleaning, replating, and/or replacement of single or multiple line replaceable unit component parts, or other maintenance actions to meet task intent of task selected to mitigate the failure cause.

