
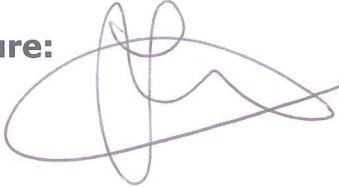


EASA	STATUS REPORT FOR TASK MDM.056 (RMT.0252) (Instructions for Continuing Airworthiness)
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1. BACKGROUND OF THE RULEMAKING TASK MDM.056

Instructions for Continuing Airworthiness (ICA) are produced by design approval holders as part of the product/part certification. These ICA, if properly implemented, should ensure that the product/part remains airworthy during its intended life.

Although in the European regulatory system provisions to address this issue are included in the relevant airworthiness codes, in Part-21, in Part-M and in Part-145, experience has shown that there is too much room for interpretation in the current rules and standards, leading to differences and possible safety risks.

The above mentioned issue and all the complex consequences were included by EASA in the rulemaking task MDM.056. According to the first Terms of Reference (ToR) issued on 28 September 2009, this task included a working group and aimed at having a deliverable in the first quarter of 2012.

The launch meeting of the working group took place at the end of 2009 where a workshop was proposed to receive direct feedback from the industry and national authorities about the major concerns. After the workshop, held in January 2010, three additional meetings took place during that year, with 24 participants in the working group, including:

- Authorities: European Aviation Safety Agency (EASA, the Agency) (6 members), Federal Aviation Administration (FAA) (2 members), Transport Canada Civil Aviation (TCCA) (1 member), European Union (EU) National Aviation Authorities (NAAs) (1 member)
- Aircraft Manufacturers (6)
- Engine Manufacturers (1)
- Airlines / Maintenance Organizations (7)

The main issues addressed in those meetings were the following:

- What kind of information items/documents/manuals are considered ICA and how are they approved/accepted by the aviation authorities?
- What happens with the information/documents/manuals which are not considered ICA? What is the level of approval/acceptance and who is responsible for their content?
- How does the MRB process fit in the approval/acceptance of ICA?
- To whom (e.g. operators, maintenance organization) and when this information (ICA and non-ICA) should be made available?
- How is this information (ICA and non ICA) used by operators/maintenance organizations and who can introduce changes?

Later on, during the discussions related to "ICA Availability Policy" that took place during the Certification Management Team (CMT) meeting held in Cologne in December 2010 between EASA, FAA and TCCA, it was found that there were parallel activities in the three authorities related to ICA. As a consequence, and in order to limit possible divergences, it was agreed to have a meeting between the three authorities in order to have a consistent approach and to increase efficiency. The objective was to ensure the production of harmonised regulatory material, which would certainly be of benefit for Industry and Competent Authorities.

This led the Agency in January 2011 to temporarily put on hold the activities of the MDM.056 working group until the specific meeting between EASA, FAA and TCCA had taken place and a harmonised approach had been agreed.

2. MEETINGS HELD BETWEEN EASA, FAA AND TCCA

The first meeting held between EASA, FAA and TCCA took place on 6-7 April 2011. During this meeting it was concluded that the scope covered by the MDM.056 task was too large, which made it extremely difficult to reach an agreed position. As a consequence it was found reasonable to study the possibility of splitting the task into several sub-tasks:

- Certain sub-tasks would cover the issues of common interest for the three authorities, and an adequate harmonisation would be pursued;
- Issues which were specific to the environment of a certain authority would be dealt separately by that authority. This meant that other sub-tasks would be created in order to address the issues specific to the EASA environment (Design Organizations, Maintenance Programmes, etc).

The following roadmap was accepted by the management of EASA, FAA and TCCA:

- In a first phase, the Agency, FAA and TCCA would analyse the areas of common interest, the priorities and, if necessary, the sequence of any resulting sub-task.
- In a second phase, the detailed activities would be carried out following the conclusions of the first phase.

This roadmap was included in a revision (Issue 3) of the Terms of Reference (ToR) for task MDM.056, which was published on 15 December 2011 on the EASA website.

For the first phase of this roadmap, 4 meetings were scheduled as follows:

- 06 - 08 September 2011 in Cologne
- 04 - 06 October 2011 in Cologne
- 08 - 10 November 2011 in Oklahoma
- 10 - 12 January 2012 in Cologne

In addition to EASA, FAA and TCCA, the Brazilian aviation authority (ANAC) was invited to the meetings, but they could not participate.

During these meetings the following was achieved in relation to the different ICA issues/questions:

- For each issue/question:
 - The current regulations, guidance and procedures of each authority were analysed and existing differences were identified.
 - The following was identified:
 - the subject category
 - whether the issue was of common interest
 - the possible need for harmonization
 - the importance of the issue, and
 - the priority of work.
- For the issues of common interest, there was a further analysis and discussion on possible solutions (amendments to rules, guidance, policy, etc), with the intention to harmonise as much as possible.

3. ISSUES ON COMMON INTEREST FOR HARMONIZATION

The following subjects were identified as of common interest and major need for harmonization:

- Definition and identification of ICA (to be provided during the certification process).
- Availability of ICA (to owners, operators, maintenance organizations, etc).
- Completeness of ICA (during the certification process).
- Level of involvement of the competent authority (during the certification process).
- Scheduling Information (MRB process).
- Validation process (for ICA approved/accepted by another competent authority).
- Review/acceptance of ICA by other than the authority.

3.1. Definition and identification of ICA

- **Definition of ICA:**

The following definition was agreed:

"Instructions for Continuing Airworthiness are the instructions and information that are necessary for the continued airworthiness of the aircraft, engine, propeller, parts and appliances, which must be developed and/or referenced by the Design Approval Holder in accordance with the applicable Certification Basis or Standard"

It is important to note the following:

- This definition can also cover Supplemental Type Certificates (STCs), Technical Standard Orders (TSOs), Parts Manufacturer Approval (PMAs), Part Design Approval (PDAs), repairs, etc, when ICAs are required by the Certification Basis or Standard.
 - This definition gives the possibility of providing ICA also by reference to documents developed by other organizations. This could be, for example, the case of a reference given to a particular Component Maintenance Manual (CMM) or "Overhaul Manual".
 - This definition includes the terms "Certification Basis or Standard" in order to cover those cases (such as TSOs) where the requirements for ICA are contained in Standards.
- **Type of information that should be covered by ICA:**

A spreadsheet was created in order to compare the ICA requirements contained in the rules and specifications for EASA/FAA/TCCA. Initially it covers only the requirements contained in CS25/Part-25/AWMChapter525, CS23/Part-23/AWMChapter523 and Part-21/Part-21/CAR Part V Subpart 21, plus those contained in the Basic Regulation EC216/2008 for EASA. It will be expanded in the future to cover all product types.

The differences will be analysed and it will be established whether there is a need to update the rules/CS/AMC/Guidance to make clear the type of information that would be required as part of the ICA.

It is important to note that the requirements will refer to type of information required and not to specific manuals/documents.

However, examples of particular manuals/documents that would meet those requirements could be introduced in guidance material. In order to do so, the authorities may check which manuals have been provided in the past by the different

manufacturers during the certification process. In the case of TCCA, this already exists in CAR Part V, Subpart 21, chapter 521.367 "Manuals", which is regulatory material.

When developing the list of typical manuals/documents, consideration needs to be taken to the fact that certain types of manuals/documents are not used for simple aircraft (balloons, airships, sailplanes, powered-sailplanes, Very Light Aircraft (VLA), Light Sport Aircraft (LSA), etc). In such cases, a single manual may contain all the required ICA.

Examples of manuals/documents that could be part of the ICA provided by the DAH (Design Approval Holder) could be the following:

- Airworthiness limitations section (ALS), which may be a separate document or part of another document.
- Aircraft Maintenance Manual (AMM)
- Schedule Maintenance Programme (Manufacturer Recommended Programme, MRBR)
- Component maintenance manuals (CMM) or component overhaul manuals (COM).
- Illustrated parts catalogues (IPC)
- Wiring diagram manuals (WDM)
- Weight and balance manuals (WBM)
- Service bulletins (SB)
- Airworthiness directives (AD)
- Electrical loads analyses (ELA)
- Extended-range twin-engine operations (CMP Configuration, Maintenance and Procedures)
- Supplemental Structural Inspection Document (SSID)
- Data associated with repairs or alterations
- Certification maintenance requirements (CMR)
- Aging aircraft maintenance
- Fuel systems maintenance (for example, Critical Design Configuration Control Limitations (CDCCL))
- Electrical wiring interconnection system (EWIS)
- Corrosion prevention and control program (CPCP)
- Key safety information (KSI)
- Other content

However, other than the AMM/Maintenance Manual and ALS (which are mentioned in the applicable Appendixes), the other manuals/documents to be provided as part of the ICA have to be defined by the DAH. It is then up to the authority to accept them or not based on whether they cover the type of information required.

- **Responsibility of the DAH for the control of ICA below the product level:**

It was clear for EASA, FAA and TCCA that as soon as a certain document (such as a Component Maintenance Manual), or part of the document is referred in the ICA, it becomes an ICA. This is clearer now since it is part of the agreed ICA definition. **Nevertheless, more guidance should be produced.**

The responsibilities of the DAH should be the same whether they develop the ICA or they refer to a document developed by somebody else. These responsibilities include those related to the adequate content, their availability to the authority and to the users, etc. **Guidance should be produced.**

- **Where the ICA definition will be included:**

The authorities need to identify where the definition of ICA will be included.

Proposals made during the meetings:

- **TCCA:** Definitely into the regulation (may be in CAR Part V Subpart 21), which should not be too difficult for TCCA. Additionally, they will also put it in guidance.
- **FAA:** Eventually would go in the regulation (probably Part-21). However, the rulemaking process will take time. In the mean time it will probably be included in the new Advisory Circular (AC) and in the revision to FAA Order 8110.54 being drafted now.
- **EASA:** It could be introduced in CS-Definitions.

- **Where the list of ICA approved/accepted for a particular product, part, etc, will be identified and made known to operators:**

The authorities have to regulate how the approved/accepted ICAs are identified and made known to the regulated persons.

This is essential so the regulated persons know which are the ICA applicable to their product.

One option is to include a generic list in the Type Certificate Data Sheet (TCDS) (with no revision level) and have the DAH produce a controlled list with the current updated document (this must be made available to the regulated persons).

Another option would be just to have the DAH produce the list (and update it), including it in the maintenance manual and making it available to the authority and the regulated persons. This is supported by TCCA.

3.2. Availability of ICA

- **Who has the right to receive ICA from the DAH and whether operators can share this information with maintenance organizations:**

FAA has released on 29/03/2012 a Policy PS-AIR-21.50-01 on "Type Design Approval Holder Inappropriate Restrictions on the Use and Availability of Instructions for Continued Airworthiness".

EASA and TCCA will have to evaluate which policy they adopt.

- **Does the “availability policy” apply not only to TC and STC holders but also to other DAHs (TSO, PMA, etc.):**

FAA:

Only for those TSO referring to ICA the general rules for ICA availability apply. This is explained in the current Order 8110.54 but will be further clarified in its process of revision currently in place.

According to FAA, only a few TSO include ICA, such as the Auxiliary Power Units (APUs) (instead, most of the TSO refer to maintenance instructions). On the other hand, AC21-50 does recommend the applicant for an approval of the installation of a TSO (through STC, etc) produce ICA. The applicant has then the choice to use, partially use or not to use the “*maintenance instructions*” contained in the TSO. This leads to the interpretation that in most cases TSO articles do not have ICA but maintenance instructions.

EASA:

EASA has some inconsistencies between Part-21 and Part-M: In 21A.609 there is reference to “*manuals*” instead of “ICA” but the availability provisions are similar to those related to ICA (they have to be provided to users of the ETSO). However, for some ETSO articles ICA are required by the ETSO standard. In addition, in M.A.302 there is reference to ICA for ETSO.

TCCA:

TCCA also has inconsistencies in relation to whether ICA are produced for TSO articles or whether they are called something different, as Part 521.107(b)(vi) makes reference to “*manuals*”.

All these inconsistencies should be removed. However, it must be decided which way to go because of the implications of calling them ICAs (availability, content, etc). This will also have an impact of the level of changes to rules and guidance that would be needed for each authority.

- **Does the “availability policy” apply to repairs and alterations:**

FAA:

In the FAA system, for repairs and modifications there is no DAH. There is still the need to approve the repair or alteration data and to provide maintenance instructions (inspections, etc) but these instructions are not subject to the general availability provisions of ICA because there is no DAH.

TCCA:

In Canada, design approval documents include repair design approvals. Therefore, the ICA policy applies and the availability policy applies. The exception is the case where the repair is performed on an aircraft whose initial certification basis did not include ICA (vintage aircraft, etc).

EASA:

In EASA, 21A.449 requires producing ICA for repairs and, thus, the provisions of availability are applicable.

Since the acceptance of repairs approved by the other authorities is described in the corresponding bilateral agreements, we may not need to fully harmonize this issue and we can continue with these differences.

3.3. Completeness of ICA

The issue here is the completeness of the ICA provided by the DAH upon delivery of the product or issuance of first standard airworthiness certificate.

- **Is it possible to provide certain ICA at a later stage?**
- **When should maintenance procedures be made available?**
- **If certain ICA are postponed, are there sufficient enforcement tools in place to ensure timely availability of the postponed elements?**

TCCA:

Their rules say that ICA may be incomplete at the time of TC if a programme exists to ensure its completion prior to delivery of the first airplane or issuance of the standard C of A. However, if such deviation was allowed, a limitation was introduced in the TCDS (such as "*no overhauls are possible, just discard*"). Formally speaking, this could be considered as if the ICAs were complete because the aircraft was not going to be operated beyond those limits. As a consequence, TCCA believes there is no need to change their rule. **TCCA will issue new guidance to make the interpretation that they are complete even if something is missing, as long as the operation can be ensured (limitations would be introduced).**

In addition, new guidance will clarify that restoration or overhaul procedures, when identified as part of the scheduled maintenance, will be required as part of the ICA, in line with the intent of the new ICA definition agreed.

FAA:

FAA Order 8110.54 allows the introduction of operational limits for structural items where the procedures or the test substantiation for the intervals are incomplete. These limits are placed in the ALS.

EASA:

EASA rules (Part-21) allow certain deferred ICA. These rules are applicable to the initial certification process and for all changes other than minor changes done by other than the DAH. In addition, these rules do not have requirements for the introduction of limitations to control and enforce the completion of the missing items (other than for Airworthiness Limitations), leaving it to the responsibility of the Design Organization.

However, it has to be considered that for STC it may not be reasonable to allow deferred items without enforceable limitations. The reason is that STC holders disappear quite often and they would not eventually issue those deferred instructions.

In addition, it is much more difficult to identify which aircraft are affected by the STC in order to make those instructions available.

3.4. Level of involvement of the competent authority

The issues here are the following:

- **Are ICAs approved? Define approved.**
- **Are ICAs accepted? Define accepted.**
- **Are they acceptable to the authority? Define acceptable to.**
- **Authority has a method to show approval of ICAs to DAHs. What is it?**
- **Authority has level of ICA verification defined.**
- **Role of authority for verification/approval of ICA and maintenance data defined.**

FAA:

The FAA currently has a Notice for review by their Office of the Chief Counsel, defining the terms "Acceptable to", "Accepted by", "Approved by".

TCCA:

TCCA had a legal opinion in 1999 in relation to the terms "acceptable to the Minister" and "approved by the Minister".

According to that legal opinion, "acceptable" means that the document (for example, certain ICA) has been developed in accordance with accepted criteria (1529 and applicable appendixes) and the acceptance is typically shown by the issuance of a higher level document (such as a type certificate). Changes to such document (ICA) could be made by the organization in accordance with approved procedures (in order to control the level of changes they can make).

"Approved" means that a document (for example, the MRB report or the ALS) has been reviewed in its entirety and an approval is issued for such document. Any change to the document needs to be reviewed and approved again. The level of involvement of the authority is higher.

The problem is that this legal opinion was not focused on ICAs.

There will be a new legal opinion issued shortly to confirm this interpretation.

EASA:

In EASA, there are currently 2 terms in relation to ICA: "accepted" and "approved".

In the case of the term "accepted" the meaning is similar to TCCA but with the difference that the level of involvement can significantly vary from no involvement to 100% involvement, depending on the particular project. This term is used for all compliance documents (such as certain ICA).

In the case of the term "approved" there is a need for formal approval of the document and re-approval of changes. The level of involvement is high although not necessarily 100%.

There has been a legal opinion related to these terms, plus the term "acknowledge". According to it, the responsibilities of the authority are the same whether the document is "accepted" or "approved". The difference is the type of document issued to show the acceptance or approval and the level of involvement.

For the future, it will be important to clarify in the rules and guidance material for each authority what is the meaning of each term and how the acceptance is shown. Regarding the level of involvement, the guidance should maintain some flexibility for the authority depending on the complexity of each project.

Currently in the EASA system, a Compliance Verification (CVE) signature from a person in the organization is required for the approved documents. A specific action on EASA is to clarify what is the verification process in the organization for those ICA not requiring a specific CVE signature.

3.5. Maintenance Instructions (Maintenance Review Board (MRB) process)

The issues here are the following:

- Are parts of the MRB report integrated into ICA? What parts?
- Are the MRB and ICA processes coordinated?
- Are engines and propellers integrated into the MRB process?
- Is there a process to integrate modifications into the MRB process before the MRB is completed?
- Is there a process to integrate modifications into the MRB before the modification is completed?
- Are there alternatives to the MRB process?

FAA:

FAA has AC 121-22C in the final stage of development (how to develop an MRB process).

EASA:

Currently, EASA does not have an AMC for the MRB process to replace the former JAA guidance. It has only Internal Procedures. There is a need to produce AMC to clarify the EASA MRB process and to make it known to the users. This AMC could be introduced as guidance to Part-21, linked to the paragraphs related to ICAs since the MRB process covers different Certification Specifications.

TCCA:

TCCA has the guidance on TP13850 and will be further developed.

3.6. Validation process

The issue here is whether there is a method to accept/validate imported product ICA.

Currently, the Technical Implementation Procedures (TIP) seems to link ICA validation with a jointly MRB process. This is not consistent with the validation concept for design, where each

authority system is compared, differences are identified and the certification findings are validated.

The FAA/EASA Validation Implementation Team (VIT) is evaluating the input on this topic received from the Aerospace and Defence Industries Association of Europe (ASD) and other industry.

The VIT is proposing to separate the discussion of ICA from MRB, creating two separate paragraphs in the TIP. This can be accomplished in parallel with this effort (task MDM.056).

3.7. Acceptance/Approval of ICA by others than the authority

EASA:

- For the initial certification process and for major changes, a Design Organization Approval (DOA) can have the privilege to approve the SRM (Structural Repair Manual). As a result of this privilege, the organization has to include in the document a statement saying that it has been approved in accordance with that privilege. Furthermore, there is a privilege (21A.263) to use a certain approval statement.
- For minor changes, the DOA issues the certificate for the minor change including any applicable ICAs.
- The privileges of the DOA described above are not considered a delegation from the authority because the DOA does not sign on behalf of EASA. For the ICAs which cannot be approved by the DOA, EASA does not delegate.

EASA has received the Industry request to have the privilege to introduce minor changes (editorial) to the ALS.

FAA:

- Privileges to accept ICA already exist (in Order 8100.15A) for Organization Designation Authorizations (ODAs) but they are not yet in use because no organization (ODA) has been qualified so far. **FAA is currently developing criteria and procedures for delegation.**
- In addition, some ODAs have the privilege to approve changes to ALS.
- The privileges described above are considered a delegation from the FAA because the ODA will sign on behalf of the FAA. There are no further delegations.

TCCA:

- No privileges or delegations exist for the industry in relation to acceptance/approval of ICAs. Internally within TCCA, acceptance of supplemental ICAs can be performed by maintenance or certification personnel.

4. ISSUES OF NOT COMMON INTEREST

The following issues were part of the initial ToR for task MDM.056 and, after being discussed and evaluated, it has been decided that they are not of common interest for the 3 authorities and will not be subject to a harmonisation effort. Each authority can pursue on its own further rulemaking at their discretion.

4.1. Definition and identification of ICA

- Are DAHs required to update ICA following in-service experience?
- Are DAHs required to provide ICA for entire product when design changes are made, even though original product predates ICA?
- Are DAHs required to adhere to the maintenance recommendations of other manufacturers (suppliers, TSOA, LODA, PMA)?
- Is it required to provide ICA for Commercial parts?

4.2. Compliance with ICA

- When ICA are required to be used.
- Authority provides guidance on maintenance data and availability requirements before ICAs were required.
- Are operators required to follow ICA?
- Is there a process for operators to modify ICA?
- Is there a process to accept operator/maintenance organizations alternate maintenance instructions?
- Is there a process (when and how) for operators/maintainers to incorporate DAH ICA changes?
- Are operators responsible to ensure compatibility between DAH (STC) and TC holder ICAs defined?
- Can changes to other maintenance documents be handled by operators/maintainers?
- Is there a process for member states can approve maintenance programs and deviations to ICA?
- Is there a process to ensure consistent implementation?
- Which ICA are mandatory?
- Under which conditions can the AMP and any deviations to it be approved by the Member States? How can we ensure sufficient information is available at Member State level and how to ensure consistent implementation?
- Consistency of Part-M and Part-145 in relation to ICA.

4.3. ALS

- What is the content of ALS?
- Must the ALS content include the corresponding maintenance procedures?

4.4. DOA privileges

- Should DOA privileges be extended for the case of minor change to ICA without design change in the case of DOA not being the DAH?
- What does the privilege to "issue" an instruction mean? Is it the controlled mechanism to issue non-approved instructions? What can/should be the role of DOA and AP-DOA in the issuance of ICA? Does the use of the privilege to issue instructions automatically lead to use the privilege on the statement of approval? What is the added value of the statement following issuance of the instructions?

4.5. Feedback of in-service experience

- Do operators/maintainers need to provide feedback to the DAH?

4.6. ICA format

- ICA can be made available electronically or on-line.
- ICAs are easy to use and understand.
- Does adherence to industry standards meet the regulatory requirements?
- Is there a process to translate ICA?

4.7. Supplemental ICA

- The DAH of a change has to ensure that when developing the ICAs for the change they have taken into account the TCH ICAs.

4.8. Responsibilities for maintenance data other than ICA

- How is maintenance data other than ICA controlled?
 - What is their status?
 - How are they controlled?
 - What are the DAH responsibilities?
 - What are the authority responsibilities?

This subject was widely discussed during the meetings, mainly because of certain concerns from EASA. The reasons for these concerns are the following:

- **A significant part of maintenance instructions used by operators/maintenance organizations are not considered ICAs, such as for example most CMMs.**
- **In many cases these instructions are produced directly by the OEM (supplier of the DAH), without any control from the DAH and without any surveillance or**

supervision. In addition, the OEM (unless they are the DAH) does not hold any approval for issuing such instructions.

- As a consequence, EASA expressed a legal concern because it is difficult, if not impossible, to establish who would be legally responsible if the content of such instructions would be incorrect and would eventually cause an accident.
- As a result, the opinion of EASA was that the control of this type of information should be subject to certain requirements, which should be proportional to the criticality of the information (in particular, the consequences of the information being wrong and the consequences of having such information changed by the operators/maintenance organizations).

On the other side, FAA and TCCA expressed they felt comfortable with the current situation since, in their opinion, the OEM has the knowledge to produce such instructions. In addition, they expressed that any regulatory change implying the obligation for the DAH to control the maintenance instructions (other than ICAs) produced by the OEMs or introducing the obligation for all OEM to hold an approval to issue such instructions, would have an extremely high impact.

4.9. Terminology

- Is there a distinction between DAH and manufacturer?
- Is the format and structure for the "principal manual" defined?

4.10. Safety related information

- Can we talk about safety related/non safety related maintenance instructions?

5. WAY FORWARD

With the work already completed and described above, finalised the Phase 1 described in the last revision (Issue 3) of the Terms of Reference (ToR) for task MDM.056, which was published on 15 December 2011 on the EASA website.

This Phase 1 has identified the areas of common interest for harmonisation and the areas of no common interest for which each authority can proceed with further rulemaking at their discretion.

It is important to emphasize that during this Phase 1 EASA, FAA and TCCA have identified the areas of common interest and have already approached their positions in order to find a harmonised approach, which would report a huge benefit both for the authorities and for the Industry. This would help to eliminate duplicated procedures and reviews, in particular for the approval of ICAs during the validation of TCs and STCs approved by the other authorities. It will also reduce the amount of MRB processes required.

During the Phase 2:

- A first step to inform Industry and NAAs about the outcome of Phase 1 was taken in the “2012 US/Europe International Aviation Safety Conference” which took place in Cleveland (USA) on 12 - 14 June 2012.
- Now this document is issued in order to provide further details.
- Sub-tasks will be created for the issues of common interest already defined. The issues to be treated under each sub-task will depend on their similarity and on the category of stakeholders to be involved. Whether FAA and TCCA will participate in these sub-tasks will depend on several factors, such as the different rulemaking process for each Authority or budget constraints. Nevertheless, coordination will be ensured with any activity performed in parallel.
- The following are the prospective sub-tasks (for issues of common interest)
 - Sub-task 1 (mostly affects EASA/FAA/TCCA and DAHs):
 - Definition and identification of ICA (to be provided during the certification process), including the determination of the relationship between ICA and maintenance information for TSO/ETSO articles.
 - Completeness of ICA (during the certification process).
 - Level of involvement of the competent authority (during the certification process).
 - Sub-task 2 (affects not only DAHs but also operators, maintenance organisations, CAMOs):
 - Availability of ICA (to owners, operators, maintenance organizations, etc).
 - Sub-task 3 (EASA/FAA/TCCA):
 - MRB Scheduling Information (guidance on the MRB process).
 - Sub-task 4 (affects EASA/FAA/TCCA and DOAs/ODAs):
 - Acceptance/approval of ICAs by other than the authority.
 - Sub-task 5 (EASA/FAA/TCCA):
 - Within the existing bilateral agreement activities, perform a review of the validation process for ICA approved/accepted by another authority.

It is important to note here that, since EASA, FAA and TCCA have already approached their positions on the issues of common interest, participants from Industry and NAAs in the above sub-tasks should focus on making proposals which would not significantly deviate, unless absolutely necessary, from the pre-agreed positions. Otherwise, the envisaged harmonisation may be jeopardised.

- For issues of non-common interest each authority will proceed on their own.