



*Issue Paper (IP)*

**IP Number:** CIP IND 2023-04

**Initial Date:** 14/02/2024

**Revision / Date (DD/MMM/YYYY):**

**Effective Date (DD/MMM/YYYY):**

**Retroactivity (N/Y):** N

<b>Title:</b>	Definition “Off-aircraft”: Clarification of the policy and meaning of “on-aircraft” and “off-aircraft” tasks in the MSG-3 document
<b>Submitter:</b>	MPIG

Applies To:	
MSG-3 Vol 1	X
MSG-3 Vol 2	X
IMPS	

**Issue:**

The current MSG-3 document uses the terms “on-aircraft” and “off-aircraft” in section 2-3-7 Task Development, paragraph (9.) Task Consolidation (see below). There are no glossary terms with definitions for “on-aircraft” or “off-aircraft” in the current MSG-3 document.

**9. Task Consolidation**

Task consolidation is normally not acceptable when establishing the initial scheduled maintenance tasks and intervals. If considered appropriate, it shall be limited to:

- failure finding tasks (OP/OPC and VC/VCK)
- tasks having the same two/three letter code.

If, for technical reasons, tasks of different types (other than OP/OPC and VC/VCK) are required to be performed during the same maintenance event then they shall be linked by a note to this effect against the tasks rather than being consolidated into a single task.

Consolidated tasks may contain tasks derived from one or more analysis dossiers.

In this case, consolidation rules are applicable and appropriate traceability must be implemented.

This paragraph applies to on-aircraft tasks only. Descriptions for off-aircraft restoration tasks may identify different task types.

**Problem:**

- 1.) The terms used to refer to maintenance conducted on a part/component (e.g., article, appliance, item) and with the part/component removed from the aircraft, may be referred to by one of two terms “off-wing” or “off-aircraft” maintenance. This is the result of cultural language norms and preferred nomenclature from operator to operator, however the specific intent of either term is the same.
- 2.) The TCH/OEM PPH may not clearly define that there are situations where an item, for technical access reason, may need to be removed from the aircraft (i.e., battery, ELT, valve, landing gear sensor, etc.) to complete the task(s). When this occurs the PPH does not define that the task type derived from MSG-3 logic analysis will remain as selected (i.e., OP/OPC, FNC CK, DET, etc.) and therefore may result in the ISC/IWG altering the task type to “Restoration” as the default selection.



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3.) The removal of the part/component from the aircraft for some operators may imply the explicit use of a CMM which may then imply a requirement for a CAA “Authorised Released Certificate” from a certified agency before the part/component may be reinstalled. It then appears that MSG-3 methodology is directing the need for autonomous CAA certification documents before the part/component may be reinstalled on the same aircraft.

However, it is understood by the MRB, ISC and Industry Working Group, IWG, that the maintenance activity may be conducted by the:

- a. Technical maintenance team that is conducting the aircraft maintenance at the aircraft location.
- b. A support team typically called a “back shop” under the authority of the aircraft operator.
- c. An outsourced entity not under the authority, but approved by the operator and CAA to conduct such MSG-3 MRBR task(s) as determined by the logic.

Conclusion, the lack of clarity resulting from the omitted glossary term of “off-aircraft” creates the opportunity for miss classified task types and inappropriate consolidations of various task types (i.e., OP/OPC, FNC CK, DET, etc.) under the classification of “restoration”. This further results in the loss of the ability for the ISC and operators to manage the applicability and effectiveness of selected task based on the MSG-3 logic, during aircraft operational management via surveillance, validation and reliability assessments.

**Recommendation (including Implementation):**

Insert two changes to the MSG-3 document next revision, 1.) add the Glossary definition for “off-aircraft” to Volume 1 & 2 as below, 2.) added the clarification para to Chapter 2-3-7 para.5:

Off-Aircraft:

Refers to the conditions, where a part/component (i.e., battery, ELT, sensor, landing gear, valve, etc.) would need to be removed and reinstalled in an aircraft to meet the Type Certificate Holders (TCH) ICA requirements (i.e., MRBR task) developed using MSG-3 logic analysis. The terms “off- aircraft” and “off-wing” are equivalent terms in the TCH’s PPH.

MSG-3 next revision, replace the text as indicated below in location Chapter 2-3-7 para.5

Current text:



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**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 or replacement of single parts up to a complete overhaul, the scope of each assigned restoration task has to be specified.

The conditions where the part/component is removed from the aircraft to comply with the task type as selected to meet the applicability and effectiveness criteria (i.e., Table 2-3-7.1 Criteria for Task Selection) does not require the task(s) to be classified as a Restoration task type due to the part/component removal requirements from the aircraft to complete the task(s).

**IMRBPB Position:**

**Date:**

**Position:**

**Recommendation for Implementation:**

**Status of the Issue Paper:**

<input checked="" type="checkbox"/>
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Active
Incorporated in MSG-3 / IMPS (with details)
Archived