

NAA's participation in the MRB, ISC, and/or WG activities

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Introduction

- EASA have recently received requests for clarification on how to participate in MRB, ISC, and/or WG activities.
- The following official documents provide all the guidance needed:
 - IMRBPB Charter (latest revision 2023)
 - International MRB/MTB Process Standard (latest issue 02)
- This presentation is intended to provide a quick reference to the coordination process in place.
 - Throughout this presentation, the term “meeting” may refer to either a physical and/or a virtual meeting, and in addition, may reflect defined periods during which group activity is performed continuously using interactive tools.

IMRBPB Membership

- IMRBPB membership include Regulatory Authorities who signed the IMRBPB Charter.
 - Participation to IMRBPB is open to any interested Regulatory Authority (*provided previous coordination with the IMRBPB Leadership Team*) [\[IMRBPB Charter 6.\]](#)
- The Maintenance Programs Industry Group (MPIG) and Rotorcraft Maintenance Programs Industry Group (RMPIG), working under the Airlines for America (A4A) Airworthiness Committee, represent the industry at the IMRBPB meeting.
 - The board is also open to input from other parties within the aviation industry (*provided previous coordination with the MPIG/RMPIG Leadership Team*) [\[IMPS 2.1\]](#)

Definitions relevant to NAAs activities

→ **Certifying Authority (CA)**

- The regulatory authority responsible for initial certification of an aeronautical product and would typically also be identified as the state of design. Normally the CA provides the MRB Chairperson during the MRB process. [\[IMPS APPENDIX 4\]](#)

→ **Validating Authority (VA)**

- Either an authority that is responsible for validating the initial CA MRBR as defined in the letter of confirmation, or who carries out a post certification validation exercise, whether the validating authority signs the MRBR or not. [\[IMPS APPENDIX 4\]](#)

→ **Guest Authority**

- Normally neither a CA nor a VA but could be representing a country who is, or may become, an operator of the aircraft. [\[IMPS 3.8\]](#)

Interface between TCH and Regulatory Authorities

- The TCH should make an application for MRB process to the CA, and VA's (as necessary), and assign a representative as **the ISC Co-Chairperson**

[IMPS 4.2.1]

- The appropriate CA manager will assign a qualified individual as **the MRB Chairperson** to manage the specific MRB process for the CA. [IMPS 4.1.3]

- **The ISC Chairperson** will work with the MRB Chairperson and is normally an operator of the aircraft or similar model from the TCH. [IMPS 4.3.3]

Participation to ISC/WG activities

- The ISC Chairperson/Co-Chairperson should invite the MRB Chairperson to the ISC meetings. [\[IMPS 4.3.8\]](#)
- The ISC Chairperson/Co-Chairperson should invite other VA representatives to ISC and WG meetings, with concurrence and coordination of the MRB Chairperson. [\[IMPS 4.3.9\]](#)
- Representatives of guest NAA's may attend ISC meetings if agreed to by the ISC Chairperson/Co-Chairperson, based on the invitation from the MRB Chairperson. [\[IMPS 4.3.2\]](#)
- Representatives of maintenance organizations may also be part of the ISC subject to acceptance by the ISC Chairperson/Co-Chairperson. [\[IMPS 4.3.2\]](#)

Coordination with other NAA's

- **The MRB chairperson** is responsible for coordinating with other participating regulatory authorities. [\[IMPS 10.1\]](#)
- The MRB Chairperson will invite other regulatory authorities, in coordination with the TCH, to participate in the MRB. [\[IMPS 10.2\]](#)
- The MRB Chairperson will issue letters of confirmation to each VA and Guest participating Regulatory Authority. [\[IMPS 10.4\]](#)
 - the scope of the agreed VA/guest involvement
 - CA expectations of the VA/guest
 - communications procedures
 - additional CA responsibilities to ensure that the MRB process meets VA needs (if any)

Letter of confirmation to VA

→ IMPS APPENDIX 2, FIGURE 5 provides an example of a letter of confirmation issued by the MRB Chairperson to a Validating Authority focal.

→ ISC Chairperson and ISC Co-Chairperson to be copied



NOTE: The following is an example of a letter to send to VA Focal showing the agreement between the CA and VA. Copy the Industry Steering Committee (ISC) chairperson, and type-certificate holder (TCH).

Subject: TCH A/C model/type, MRB activity

Dear "Validating Authority (VA) Focal":

Per "Certifying Authority (CA)" guidance, I would like to offer this letter of confirmation regarding the "TCH aircraft Type" aircraft, MRBR activity.

As the CA authority for the "TCH aircraft Type" Aircraft we "CA" would like to define our requirements in accordance with our guidelines and as per the process agreed by IMPS, which outlines the process for VA approval.

This confirmation letter outlines our working relationship with your authority. VA's will perform the following functions regarding the "TCH aircraft Type" Aircraft MRB activities:

1. Participate in the development and acceptance of the PPH. Any CA regulatory differences will be defined in an appendix to the PPH.

Any regulatory differences that might lead to multiple versions of an MSG-3 analysis must be elevated to the level of the CA MRB management team for resolution prior to PPH acceptance.

2. "VA's" will coordinate all requested PPH differences and changes through the "CA" MRB Chairperson.

3. Participate in the MRB WG activities, inform the "CA" WG Advisor of any national regulatory or technical differences. The "CA" Advisor will solicit regulatory concurrence from the other VA's.

In addition, any regulatory differences between the CA and other VA's at the completion of the MRB process shall be documented in a separate MRBR appendix/section.

4. The "CA" Advisor will ensure the conversation or debate over an issue ends in a timely fashion to ensure the completion of WG activities in an appropriate timeframe.

"VA" MRB advisors shall write any concerns/comments that they may have to the "CA" MRB advisor. The "CA" will review these comments and discuss them with the "VA" MRB advisor as necessary before providing a consolidated set of comments to the applicant. This compilation shall clearly identify any comment that is specific to one or more NAA.

Conversely, if agreed by all NAA and TCH, comments may be submitted to TCH directly.

Letter of confirmation to Guest Authority

→ IMPS APPENDIX 2, FIGURE 5
provides an example of a letter of
confirmation issued by the MRB
Chairperson to a Guest
participating Regulatory Authority.

→ ISC Chairperson and
ISC Co-Chairperson to be copied



International MRB Policy Board

NOTE: The following is an example of a letter to send to "guest National Aviation Authority (NAA)" focal when the "guest" NAA is planning to attend MRB activities, but not approve the MRBR. Copy the Industry Steering Committee (ISC) chairperson, and type-certificate holder (TCH).

Subject: [TCH] [A/C Model Type], MRB activity.

Dear Sir,

Per [CA] procedures, I would like to offer this letter of confirmation regarding the [TCH] [A/C Model Type] MRB activity.

As the CA for the [TCH] [A/C Model Type], we, [CA] would like to define our requirements in accordance with our guidelines and in line with the process agreed by IMPS for guest regulatory authorities.

This letter will serve as the confirmation letter outlining our working relationship with [NAA].

As per e-mail(s) dated [Date], [CA] welcomes [NAA] to participate only in advisory capacity to the [TCH] [A/C Model Type] MRB process and not to approve the MRB Report.

[NAA] will perform the following functions regarding the [TCH] [A/C Model Type] MRB activities:

1. During the PPH development [NAA] might issue comments through the [CA] MRB Chairperson.
2. Participate in the MRB MWG activities, under the coordination of the [CA] MWG Advisor.
3. The [CA] MWG Advisor will ensure the conversation or debate over an issue ends in a timely fashion to ensure the completion of MWG activities in the allotted time.
4. Attend ISC meetings by invitation from the ISC Chairperson released through [TCH] in coordination with the [CA] MRB Chairperson.
5. Notify the [CA] MRB Chairperson of any [NAA] regulatory issue.

Please confirm agreement with this letter.

Sincerely,

CA

Thank you!

easa.europa.eu/connect



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