International Maintenance Review Board Policy Board (IMRBPB) Issue Paper (IP)

Initial Date: 26/04/2012

IP Number: 123

Revision / Date: Rev 2 / 04 Dec 12

Title: Aircraft utilisation considered in the MRBR (Utilisation Windows / regular operation)

Submitter: EASA

Issue:

MRB process is done considering a clear utilisation of the aircraft. This utilisation is specifically mentioned in the MRBR as so called "utilisation windows" stating the minimum and max utilisation of the aircraft.

Any aircraft operating outside this range should be maintained as per Low utilisation Program (LUP) or High utilisation program (HUP) and are addressed separately.

However, even when operating within the defined "windows", it is considered during the MRB process that the aircraft is flying on a regular basis so called "normal operation". In case of non operation exceeding some specific period (calendar time) additional maintenance are necessary and usually addressed through short /long term storage instructions. If the operational "range" is clearly stated, no information are provided regarding this so called "normal utilisation"

Problem:

It happen that even when operating within the MRBR defined "utilisation windows" the aircraft may be operating on a non regular basis with important non operation period. If instructions exist they are not mentioned in the MRBR. In absence of any reference or even simple statement regarding theses instructions, some authorities are facing difficulties to required consideration of short/long term utilisation storage/parking instructions if the aircraft is flying in the "utilisation windows" considering the MRBR does not mention them.

The goal is to help authorities and remind operators that the maintenance as defined in the MRBR is only valid for a "regular" use of the aircraft.

It is not at all the goal to define any thing else but just to mention the fact that additional maintenance is required in case of non regular utilisation of the aircraft and to ensure safety preventing operators to ignore theses data and helping the authorities to ensure proper airworthiness.

Considering assumption for range of utilisation and regular utilisation are considered in the MRB process and the MRBR, the goal is to make it clear regarding the regular aspect as it is today regarding the "range" of utilisation.

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Recommendation (including Implementation):

A statement in the MRBR is added in addition to the identification of the utilization such as:

"Additional procedures may be required for periods of non-operation of the aircraft, e.g. parking/storage/etc."

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Date: April 26, 2012

Position:

Recommendation accepted.

CIP closed as IP 123.

Status of Issue Paper (when closed state the closure date): April 26, 2012

Recommendation for implementation:

Incorporate recommendation upon next revision of the MRBR and develop regulatory guidance, as required.

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