

# *Continuous Monitoring of Maintenance Instructions*

*Revision (original release)*

# 119



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## Highlights

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### Release History

ATA Specification 119, **January, 2014**

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### Revision (original) (January, 2014)

Location	Description of Change
N/A	N/A

## Definitions of Terms and Acronyms

AD	Airworthiness Directive
AOG	Aircraft on Ground
AMM	Aircraft Maintenance Manual
AMOC	Alternative Method of Compliance
ASAP	Aviation Safety Action Program—a program allowed and defined by Advisory Circular 120-66B “Aviation Safety Action Program (ASAP)” to encourage operator and repair station employees to voluntarily report safety information that may be critical to identifying potential precursors to accidents.
ASRS	The Aviation Safety Reporting System collects voluntarily submitted aviation safety incident/situation reports from pilots, controllers, mechanics, and flight attendants. The ASRS acts on the information these reports contain. It identifies system deficiencies, and issues alerting messages to persons in a position to correct them.
BCS	Boeing Communication System--an electronic messaging system between Boeing Commercial Airplanes and its customers that allows communication routing, management, response, and storage.
CMM	Component Maintenance Manual
COSP	Continued Operational Safety Program
Critical Behavior Programs	Aircraft maintenance organization programs that specify to the mechanic critical behaviors that must always be followed during aircraft maintenance.
DAH	Design Approval Holder
DDCS	Digital Data Customer Support, a Boeing Commercial Airplanes Group organization that supports Boeing customers in the use of the MyBoeingFleet customer web portal and its various applications.
EASA	European Aviation Safety Agency



EO	Engineering Order, maintenance documentation, typically written by the Engineering Department of an operator, that provides guidance to a mechanic on how to carry out, for example, a Service Bulletin incorporation or some other modification to an aircraft.
FAA	Federal Aviation Administration
GMM	General Maintenance Manual
ICA	Instructions for Continued Airworthiness provide a method of advising those responsible for maintenance of the aircraft what actions they must take to ensure continued airworthiness after the Type Certificate or Supplemental Type Certificate is issued.
IFE	In-Flight Entertainment
MEDA	Maintenance Error Decision Aid—A process for investigating the contributing factors to a maintenance-error caused event
M-LOSA	Maintenance Line Operations Safety Assessment
OEM	Original Equipment Manufacturer
SB	Service Bulletin
SDR	Service Difficulty Report—a report that is required, as specified in 14 CFR 121.703, from an operator to the FAA.
TEM	Threat and Error Management.  TEM is the philosophical basis for the M-LOSA process. The philosophy is that there are threats internal to a mechanic and external to a mechanic that, if not managed properly, can lead to errors. The errors, if not caught and corrected can lead to an event or some other outcome.

# Chapter 1. Continuous Monitoring of Maintenance Instructions

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## 1-1. Background

Responding to evidence from at least one accident and the resultant National Transportation Safety Board (NTSB) recommendation, the Commercial Aviation Safety Team (CAST) approved Safety Enhancement (SE) 170 task force (SE170) to foster improved communication between operators and Original Equipment Manufacturers/Design Approval Holders (OEM/DAHs) and their suppliers regarding safety-related maintenance instruction issues. In particular, CAST was concerned that OEM/DAHs may develop maintenance instructions that operators have difficulty physically performing or verifying the correct completion, and that this could lead to degraded system safety over time.

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## 1-2. Purpose and Implementation

As a result of its deliberations, (SE170) made several recommendations, certain of which are directed to operators (in boldface print below), the intended users of this specification. This specification outlines a means of accomplishing the reporting intent of the SE170 recommendations. The process is sequentially ordered to assure that identified potential safety concern items are rigorously evaluated and clearly communicated first within the operator's systems and, if valid and appropriate, to the OEM/DAH.

The recommendations of SE170 area as follows<sup>1</sup>:

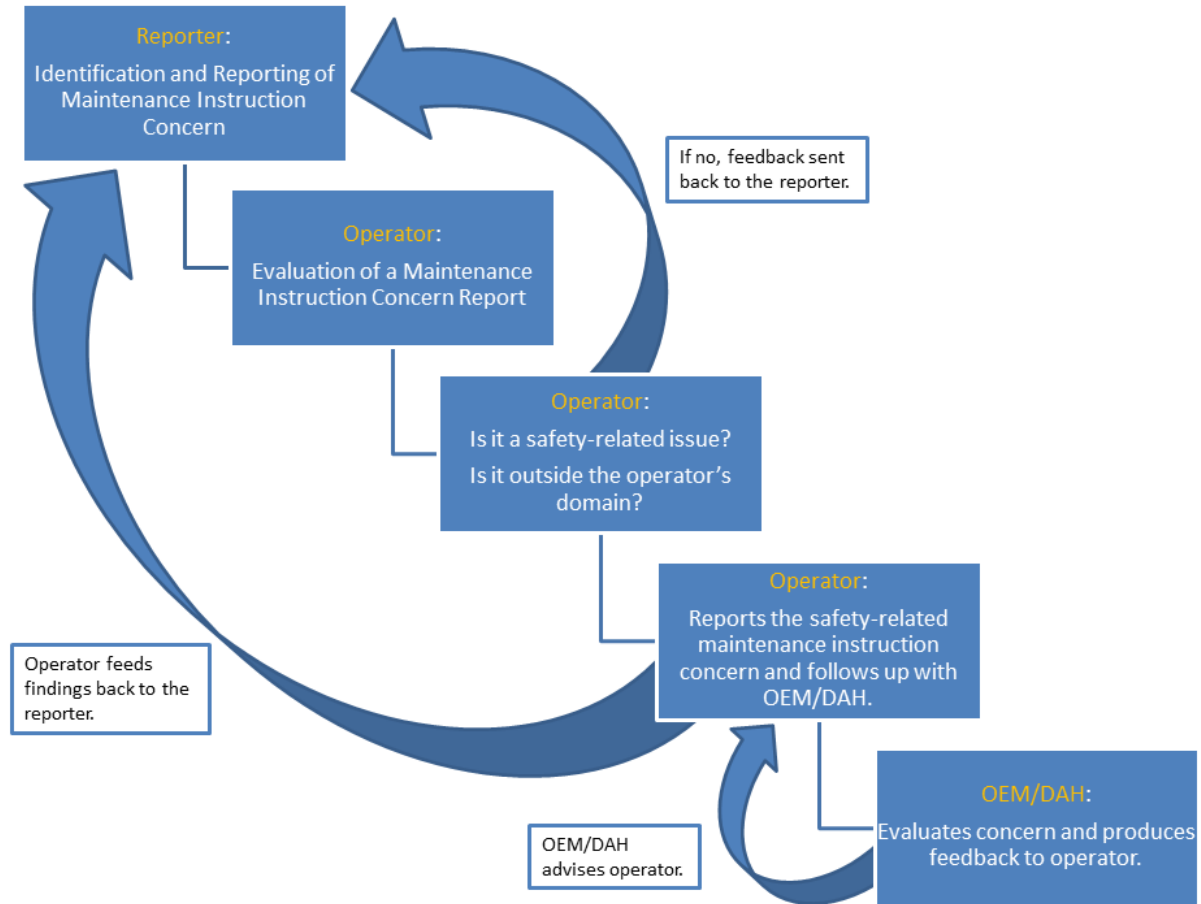
- 1) The aviation industry should develop and reinforce a culture that all mechanics work to the operator maintenance instructions, which are based on OEM/DAH maintenance instructions.
- 2) **Operators should develop or reinforce a procedure for mechanics or maintenance providers to report any problems in following maintenance instructions.**
- 3) **Operators should develop or reinforce a procedure for determining whether these maintenance instruction problems are safety related and need to be corrected internally or communicated to the OEM/DAH.**
- 4) **Operators should develop or reinforce a procedure for providing feedback to the mechanic on the resolution to the problem that they reported.**

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<sup>1</sup> Final Report, SE-170 Task Force Output, "Aircraft Design—Original Equipment Manufacturer/Design Approval Holder Continuous Monitoring of Service History", Best Practices Task Force, Commercial Aviation Safety Team November 2012

- 5) OEM/DAHs that provide maintenance instructions directly or indirectly to an operator or maintenance provider should have a communication process that allows operators and maintenance providers to report safety related problems with OEM/DAH maintenance instructions.
- 6) OEM/DAHs that provide maintenance instructions directly or indirectly to an operator should have a process in place to identify and respond to emerging issues and concerns regarding maintenance instructions that may cause a safety-related problem. [In some cases an OEM may not have a review and response process described in this report, in which case the operator may have to establish the necessary processes.]
- 7) **Operators should report the following issues to the OEM/DAH when the related OEM/DAH maintenance instruction (is characterized by any item listed Section 2-1-4 (4) below.)**
- 8) **Information that operators should include in the reports are the applicable items (in the list given in Section 2-2-1 below.)**
- 9) **Operators should implement a practice of submitting reports related to safety issues caused by OEM/DAH maintenance instructions back to the OEM/DAH when they encounter issues.**
- 10) OEM/DAH's should respond as quickly as possible to the operator report regarding a maintenance instruction problem. This response could be in the form of:
  - a) An acknowledgement of the receipt of the report and a description of the corrective action plan
  - b) No action on the part of the OEM/DAH is required but the operator may need to provide awareness or training instruction
  - c) A change to a maintenance instruction, tooling or to maintenance instruction usability.
- 11) **As much as possible, the OEM/DAH should partner with the operator or maintenance provider to validate updates or changes procedurally to complex maintenance instructions. As much as possible the OEM/DAH should incorporate human factors principles and techniques in the development of updates or changes to maintenance instructions.**

## Chapter 2. Continuous Monitoring of Maintenance Instructions - Process



### 2-1. Preliminary Assessment

#### 2-1-1 Identification and Reporting of Maintenance Instruction Concern

A maintenance instruction concern is considered to exist when the task,

- is ambiguous, incomplete, inaccurate, ineffective, unable to be performed or does not achieve its intended purpose
- if performed as written, does not adequately address its intended maintenance purpose and such inadequacy has personnel or safety-of-flight implications, or
- endangers the safety of the person performing the task, or surrounding persons, and/or invites deliberate deviation in order to assure personnel safety, or
- is sufficiently ambiguous or incomplete as to contribute to inadvertent improper execution and such improper execution has personnel or safety-of-flight implications.

A maintenance instruction concern most often originates from a maintenance technician performing the task, or through the task card writing process implemented within an operator's engineering department (or contracted function).

Maintenance technicians sometimes find that they cannot or should not follow a maintenance instruction exactly as it is written. There are many reasons for this—there is a step missing, the instruction refers to the wrong figure, (equipment, part, consumable, access panel), data provided in a table is incorrect or missing, there is an effectivity issue, etc,

These task instructions could have been provided by the OEM/DAH or by the operator's engineering staff who authors task cards, engineering orders (EOs), and other company-developed instructions. Also, the operator's engineering staff who authors the company-provided instructions may find issues with OEM-DAH provided task instructions.

The maintenance organization should have a process in place for technicians and authors to report the above types of issues, so that the problems with the instructions can be analyzed to see if the problem is safety-related, whether the problem should be fixed (regardless of whether it is safety-related), and who needs to fix the problem. Appendix A provides an example of a form that could be used by maintenance technicians and engineering staff authors for this purpose.

A maintenance instruction concern shall be identified in sufficient detail to enable subsequent determination whether it is, or may become, a safety-related issue meriting a change to the operator's maintenance program or documentation, including notification to the OEM/DAH whose involvement will often be required to effect recommended changes fleet-wide.

Notwithstanding the above characterization of existing documentation, a concern also arises when a maintenance instruction appears to be *missing* a needed step or task and the omission constitutes a safety concern.

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## **2-1-2 Evaluation of a Maintenance Instruction Concern Report**

Upon receipt of a report of a maintenance instruction concern, the affected operator shall conduct an internal evaluation to determine 1) if the concern poses a safety risk arising from work documents that requires further action, and 2) whether the concern is strictly internal to its operation, or whether the concern is outside the operator's domain thereby requiring reporting to the OEM/DAH.

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### **2-1-2.1 Determine Whether a Safety-Related Issue Exists**

Discussion:

The operator shall review the relevant facts and conduct an internal analysis to determine if a safety-related issue actually exists. The operator's analysis could include data provided by a submitted report and any other relevant facts that can be assembled. If the operator determines there is no safety-related issue, feedback should be provided to the reporter that a thorough investigation of the concern was undertaken and the reason(s) the concern was not categorized to be a safety issue, and further action, if any.

An example framework through which an operator may undertake the assessment process utilizes the operator's Aviation Safety Action Partnership (ASAP) program. Practically, multiple ASAP programs may exist within the operator specializing in various operational disciplines, one of which being maintenance. The cognizant ASAP includes an Event Review Committee that will review each reported issue to determine its applicability to the ASAP Memorandum of Understanding reporting criteria. Determination of a safety risk and its causal factor(s), including maintenance instructions or documentation, occur during this process.

Requirements:

- 1) Upon receipt of a concern report, the operator shall immediately assess the report to determine if an ongoing risk exists that must be addressed quickly, and assure immediate action is taken as appropriate.
- 2) Through its ASAP or similar process the operator shall, after initial review to eliminate non-safety issues, forward the report to the affected department for further resolution and arrange presentation of the report and underlying issue before a committee of cognizant experts. The committee will recommend and/or monitor the remainder of the process.
- 3) If it is determined the issue does NOT represent a safety risk, such feedback will be provided to the initial reporter.
- 4) If the operator determines that the reported safety concern related to maintenance documentation is valid, the process continues to the next section, "Determine if reporting to the OEM/DAH is required".

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### **2-1-2.2 Determine if reporting to the OEM/DAH is required.**

Requirements:

- 1) In its investigation, the ASAP or similar process will determine which work documents are applicable to the issue.
- 2) The operator shall determine if the documents are at fault or an improvement opportunity exists.
- 3) The operator's document "owner" shall be identified and corrective measures shall be negotiated.

- 4) Although the primary concern is correctness of documentation used by the operator's own employees, the operator shall use the following criteria to determine if the OEM/DAH will be notified of the findings. **IT IS AT THIS CRITICAL POINT THAT SAFETY OF THE OEM/DAH'S WORLDWIDE FLEET MAY BE ENHANCED** by action of the operator whose personnel discovered the issue.

The operator shall use the following criteria to decide if the concern shall be reported to the OEM/DAH<sup>2</sup>.

- Cannot be accomplished as written due to, for example, physical difficulty
- Could or has led to a maintenance error
- Is missing, incomplete or inaccurate
- Contains the wrong configuration
- Is ambiguous, confusing, poorly written, disorganized, or impractical
- Is related to Airworthiness Limitations, Certification Maintenance Requirements, Service Difficulty Reports (SDR) as specified in 14 CFR 121.703, Mechanical Interruption Report as specified in 14 CFR 121.705, or an operator's Required Inspection Item (RII)
- Is contained in a Service Bulletin (SB) and caused the operator to request an Alternate Method of Compliance (AMOC) to an AD
- Contributed to or caused an operational safety event
- Is considered to be safety critical.

If the operator determines that none of the above criteria is applicable, and that the concern does not otherwise deserve exposure to the OEM/DAH for fleet-wide consideration, the operator shall implement internal processes to rectify the issue.

If the operator determines that the reported safety concern related to maintenance documentation arises from OEM/DAH sources, the process continues to Section 2-2. "Reporting a Safety-Related Maintenance instruction Concern".

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<sup>2</sup> *ibid*

## **2-2. Reporting a Safety Related Maintenance Instruction Concern to the OEM/DAH**

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### **2-2-1 Reporting Criteria**

The operator shall maintain an effective communication channel between itself and the OEM/DAH that assures work document related concerns reach appropriate personnel at the OEM/DAH in a timely manner. Examples are the Boeing Communication System (BCS) a secure electronic messaging system between Boeing Commercial Airplanes (BCA) and its customers and the GE Aviation Operation Center, another secure messaging system at the engine OEM level.

The following information if applicable should be included when external reporting of a concern to the OEM/DAH is indicated<sup>3</sup>:

- If the request is safety-related
- If a Temporary Revision is needed
- Operator International Civil Aviation Organization (ICAO) code (who is the operator of the airplane?)
- Airplane model, Document, Task number, step (example: 777 AMM 27-11-00-700-801 step 2.E.(7) )
- Unique airplane identifier (e.g., serial number or line number)
- Date of the event
- Engine type/manufacturer/serial number/engine hours and cycles
- Airframe and /or engine flight hours and cycles
- Station
- Part number/serial number
- Statement of the problem (with as much detail as possible), including any investigation results from, for example, a MEDA investigation
- Whether it is an Aircraft on Ground (AOG) issue
- Reference documents
- Digital media (e.g., graphics, videos, drawings, renditions, and photos)
- Recommended action or proposed revisions to text of the maintenance instructions

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<sup>3</sup> ibid



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## **2-3. Follow-up with the OEM/DAH**

Upon submission of a concern to the OEM/DAH, the operator shall assure an appropriate feedback loop is established with the OEM/DAH to monitor the assignment of action and timely response. The expectations of this process should be well-known to the OEM/DAH, and timely initial feedback is expected. The OEM/DAH shall, through its own internal processes, determine its course of action.

As outlined by the SE170 report, responses from the OEM/DAH should be as rapid as practical, and take the form of <sup>4</sup>:

- An acknowledgement of the receipt of the report and a description of the corrective action plan
- No action on the part of the OEM/DAH is required but the operator may need to provide awareness or training instruction
- A change to a maintenance instruction, tooling or to maintenance instruction usability.

Follow-up expectations and an estimated schedule should be identified and monitored until final resolution is obtained.

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## **2-4. Follow-up with the initial reporter**

When final resolution is obtained, either through internal processes for a concern whose root cause is within the operator's systems, or as a result of action taken by the OEM/DAH, the operator should directly feed back to the initial reporting party in a manner that reinforces the effectiveness of the process and appreciation of the individual reporter's input.

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<sup>4</sup> *ibid*

## Appendix A. Example Initial Concern Report

Notification Date \_\_\_\_\_

Subject: \_\_\_\_\_ (Maintenance Instruction Concern)

To: \_\_\_\_\_ (Operator's Mtc safety evaluator)

**REFERENCES: Aircraft Maintenance Manual** \_\_\_\_\_

**Task Card** \_\_\_\_\_ **Engineering Order** \_\_\_\_\_  
**Other** \_\_\_\_\_

Issue: The referenced maintenance instruction presents a potential safety concern as follows:

Please summarize the issue: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Submitted by \_\_\_\_\_ | \_\_\_\_\_ | \_\_\_\_\_  
 Print Name Signature Employee #

Under what circumstances did the issue arise? (complete applicable items)

Airplane model, Document, Task number, step example: 777 AMM 27-11-00-700-801 step 2.E.(7)	
Unique airplane identifier (e.g., tail number, serial number or line number)	
Date of the event	
Engine type/manufacturer/serial number/engine hours and cycles	
Air frame/engine flight hours and cycles	
Station	
Part number/serial number	
Aircraft on Ground (AOG) issue?	
Reference documents	
Digital media (e.g., graphics, videos, drawings, renditions, and photos)	

### Example Initial Concern Report, page 2

This issue is considered safety related for the following reason(s): (check all that apply)

	1. Cannot be accomplished as written due to, for example, physical difficulty
	2. Could or has led to a maintenance error
	3. Is missing, incomplete or inaccurate
	4. Contains the wrong configuration
	5. Is ambiguous, confusing, poorly written, disorganized, or impractical
	6. Is related to Airworthiness Limitations, Certification Maintenance Requirements, Service Difficulty Reports (SDR) as specified in 14 CFR 121.703, Mechanical Interruption Report as specified in 14 CFR 121.70, or an operator's Required Inspection Item (RII)
	7. Is contained in a Service Bulletin (SB) and caused the operator to request an Alternate Means of Compliance (AMOC) to an Airworthiness Directive (AD)
	8. Contributed to or caused an operational safety event
	9. Is considered to be safety critical.

Ref: CAST SE 170 (12/2012)

For each item checked above or other reasons, please provide full detail, especially any safety implications.

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Continue on additional pages as needed.

**Initial Concern Report Supporting Detail**

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## Annex 1. References and Additional Sources

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### 1-1. References

Regulations can be viewed at the [Government Printing Office Web site](#).

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### 1-2. Additional Sources

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