

WEBVTT

1

00:00:03.065 --> 00:00:05.685

All right, we'll get started here.

2

00:00:05.685 --> 00:00:07.805

What better way to, uh, aid your digestion

3

00:00:07.805 --> 00:00:11.245

and help your, uh, food settle than regulatory change?

4

00:00:13.305 --> 00:00:15.045

Uh, I'm gonna start with a little, uh,

5

00:00:15.435 --> 00:00:18.245

risk management, uh, story.

6

00:00:19.985 --> 00:00:23.965

My, uh, my intended mode of transportation here was,

7

00:00:24.145 --> 00:00:25.445

was my personal airplane.

8

00:00:26.165 --> 00:00:30.565

I was gonna fly it here on Monday, on Sunday.

9

00:00:31.805 --> 00:00:33.285

I was working on, uh, putting,

10

00:00:33.285 --> 00:00:36.805

putting the old snowblower away in my garage.

11

00:00:37.195 --> 00:00:39.845

I've got a little gap between my workbenches there that I,

12

00:00:39.965 --> 00:00:42.445

I kinda shove it into and tip it up against the wall,

13

00:00:43.825 --> 00:00:46.365

and I put a jacks stand under it to hold it up there so

14

00:00:46.365 --> 00:00:47.445
that it stays tipped up.

15

00:00:48.465 --> 00:00:50.485
So, I was kneeling on the ground setting.

16

00:00:50.505 --> 00:00:52.285
The jacks stand up and the jacks stand slipped.

17

00:00:53.585 --> 00:00:58.525
And, uh, you can see the little gold bolt there at the top

18

00:00:58.545 --> 00:01:02.645
of the handle that came down right onto my head.

19

00:01:03.345 --> 00:01:05.765
That's 190 pound snowblower, by the way.

20

00:01:06.585 --> 00:01:09.645
And, uh, so I spent three hours in the emergency room

21

00:01:10.425 --> 00:01:12.285
and, uh, getting a CT scan,

22

00:01:12.345 --> 00:01:15.525
and they said, well, the CT scan can't really tell us if you

23

00:01:15.525 --> 00:01:17.885
have a concussion, so maybe don't

24

00:01:17.945 --> 00:01:19.165
fly your airplane tomorrow.

25

00:01:20.105 --> 00:01:22.245
Uh, and here's some staples in your scalp,

26

00:01:22.345 --> 00:01:23.485
by the way, to hold it together.

27

00:01:23.965 --> 00:01:26.245

I should have known the day wasn't starting off good,

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00:01:26.245 --> 00:01:28.365

because you can also see the, that,

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00:01:28.475 --> 00:01:30.605

that rope hanging down from the handle,

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00:01:30.605 --> 00:01:35.365

that's the starter cord, uh, which pulled off when I tried

31

00:01:35.365 --> 00:01:36.845

to start it to run the gas out.

32

00:01:37.425 --> 00:01:39.365

Um, so the day didn't start off

33

00:01:39.365 --> 00:01:40.565

real good in the first place.

34

00:01:40.585 --> 00:01:45.285

So, anyway, uh, so no, uh, no Betty Lou

35

00:01:45.505 --> 00:01:47.485

for me, I let United do the flying.

36

00:01:48.385 --> 00:01:51.645

And, uh, if, if anything goes south on this presentation,

37

00:01:51.665 --> 00:01:53.165

I'm gonna blame it on the snowblower.

38

00:01:53.945 --> 00:01:58.245

But, uh, I, I, I now have to, uh, decide on

39

00:01:58.245 --> 00:02:00.565

what my options are for when I do garage work.

40

00:02:01.425 --> 00:02:05.725

Um, I'm thinking this is probably a, a low cost option

41

00:02:05.865 --> 00:02:06.965
that's available to me.

42

00:02:07.585 --> 00:02:10.885
Uh, if I wanna spend a little more money, we've got the, uh,

43

00:02:11.005 --> 00:02:12.245
the Hulk buster armor there.

44

00:02:12.245 --> 00:02:13.565
That's gonna look good in the corner

45

00:02:13.565 --> 00:02:15.765
of my hangar too, uh, later.

46

00:02:16.185 --> 00:02:21.045
But, uh, there's also, um, the biggest helmet you can find.

47

00:02:21.865 --> 00:02:24.165
And, uh, this one's a little more formal too, for,

48

00:02:24.345 --> 00:02:25.965
for formal occasions, if you ever noticed

49

00:02:25.965 --> 00:02:29.365
that dark helmet actually wears a little black tie, uh,

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00:02:29.705 --> 00:02:32.845
on the front of his costume, there've always enjoyed

51

00:02:32.845 --> 00:02:34.245
that, that one.

52

00:02:34.385 --> 00:02:38.885
So, um, we're gonna talk about, um,

53

00:02:39.535 --> 00:02:41.205
40 40 26 FAA order.

54

00:02:41.205 --> 00:02:43.645

40 40 26 is air cer, aircraft certification,

55

00:02:43.645 --> 00:02:46.925

risk management, uh, uh, aircraft certification,

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00:02:46.925 --> 00:02:48.365

flight test, risk management.

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00:02:51.505 --> 00:02:55.925

Uh, we'll talk about, uh, the current version of it, uh,

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00:02:55.925 --> 00:02:57.525

which is the CC model.

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00:02:57.745 --> 00:03:01.125

And then, uh, we're working on revision d including some

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00:03:01.125 --> 00:03:04.245

focus items there, sharing of safety reports, uh,

61

00:03:04.245 --> 00:03:05.845

the accepted risk management process,

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00:03:06.385 --> 00:03:08.085

and a, a new SMS chapter,

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00:03:08.675 --> 00:03:10.405

some other little tidbits I'll show you.

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00:03:10.945 --> 00:03:13.165

And then we'll talk about, uh, the next steps on that.

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00:03:14.705 --> 00:03:18.445

So, the, uh, the order itself has, uh,

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00:03:18.465 --> 00:03:20.485

was first published in the late 1990s,

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00:03:21.185 --> 00:03:22.845

and it came about as a result

68

00:03:22.845 --> 00:03:25.085
of several flight test accidents, uh,

69

00:03:25.085 --> 00:03:27.965
including the last fatal aircraft accident involving

70

00:03:28.025 --> 00:03:29.285
an FAA flight tester.

71

00:03:29.905 --> 00:03:33.165
Uh, that person was FTE, uh, Darryl Schuler from Wichita.

72

00:03:33.165 --> 00:03:37.165
He was killed in a, a Piper Pawnee crash in 1996.

73

00:03:37.345 --> 00:03:40.485
So, uh, several things, uh, worked together

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00:03:40.585 --> 00:03:42.325
to bring about the, the initial

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00:03:42.325 --> 00:03:43.685
publication of that document.

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00:03:44.225 --> 00:03:48.165
And it's been used by the industry ever since, uh, as sort

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00:03:48.165 --> 00:03:50.605
of a guidebook for, for flight test risk management.

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00:03:51.825 --> 00:03:56.805
Uh, of course, the audience is everyone who's involved in,

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00:03:56.805 --> 00:03:58.685
uh, air flight test activities.

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00:03:58.745 --> 00:04:01.925
Air is aircraft certification, FAA aircraft certification,

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00:04:02.665 --> 00:04:04.245

if you don't know, that's our office symbol.

82

00:04:04.945 --> 00:04:07.725

Um, and their managers

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00:04:07.945 --> 00:04:10.685

and flight test includes ground and flight test.

84

00:04:10.945 --> 00:04:13.165

Uh, that's be, that's done for certification.

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00:04:13.785 --> 00:04:16.245

And we also, in the FAA in our branch,

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00:04:16.345 --> 00:04:18.245

we do some research activities as well.

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00:04:19.345 --> 00:04:21.325

Uh, and we also, we wanna manage the risk

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00:04:21.325 --> 00:04:22.405

for those activities.

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00:04:22.905 --> 00:04:26.445

And, uh, it also applies to other, uh, FAA lines of business

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00:04:26.465 --> 00:04:28.045

who are involved in flight test activities,

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00:04:28.495 --> 00:04:30.405

designated engineering representatives,

92

00:04:30.545 --> 00:04:33.485

and, uh, ODA holders in their conduct

93

00:04:33.545 --> 00:04:35.765

of FAA certification flight test activities.

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00:04:35.765 --> 00:04:40.565

So, a lot of you folks in the room, uh,

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00:04:40.565 --> 00:04:43.405

the main reasons for, uh, the last revision, uh,

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00:04:43.405 --> 00:04:46.805

the most current revision, which was published in 2021, uh,

97

00:04:46.945 --> 00:04:50.045

our organization went through a reorganization in 2017.

98

00:04:50.145 --> 00:04:52.405

So we wanted to make all the office symbols

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00:04:52.405 --> 00:04:54.285

and terminology correct, uh, for that.

100

00:04:55.025 --> 00:04:58.965

Uh, we had a, a team, uh, look at our safety review board

101

00:04:58.965 --> 00:05:00.925

and risk management review process,

102

00:05:01.945 --> 00:05:05.805

and they, uh, produced an appendix that's in the CE version,

103

00:05:07.145 --> 00:05:09.365

uh, talking about the details of, of

104

00:05:09.365 --> 00:05:10.685

how a safety review board

105

00:05:10.945 --> 00:05:14.205

or a risk management review, um, should be done.

106

00:05:16.145 --> 00:05:19.845

We had, uh, an outstanding NTSB safety recommendation from

107

00:05:19.845 --> 00:05:23.525

the 2011 Gulfstream accident in Roswell, um,

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00:05:25.195 --> 00:05:27.165

that the NTSB recommended

109

00:05:27.165 --> 00:05:31.285

that the FAA publish guidelines on F-A-A-S-M-S

110

00:05:31.585 --> 00:05:33.245

or, uh, flight test SMS.

111

00:05:34.305 --> 00:05:38.285

And, uh, so the C version was, uh, an attempt at addressing

112

00:05:38.285 --> 00:05:40.885

that recommendation and then some other low hanging fruit,

113

00:05:41.225 --> 00:05:42.605

um, to, to change.

114

00:05:44.505 --> 00:05:47.045

So that team, there are a couple of them in the room.

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00:05:47.045 --> 00:05:50.365

David Weber, 1 Wilson, and Jason Bryce are all here,

116

00:05:50.365 --> 00:05:52.125

and Eric Kinney, uh,

117

00:05:52.125 --> 00:05:54.405

those folks were all involved in the C revision.

118

00:05:56.465 --> 00:06:00.005

And the structure is, um, a bunch of

119

00:06:00.115 --> 00:06:01.845

what I call fluff at the beginning.

120

00:06:02.665 --> 00:06:06.845

Um, the meat of the document is, uh, paragraph six

121

00:06:06.845 --> 00:06:08.125

through 10, and

122

00:06:08.125 --> 00:06:10.885

with seven being the flight test risk management paragraph,

123

00:06:11.585 --> 00:06:14.245

uh, with an asterisk on that that'll show on the next slide.

124

00:06:14.825 --> 00:06:16.965

Uh, it also talks about organization safety,

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00:06:16.965 --> 00:06:19.965

event reporting, uh, risk accident response plans,

126

00:06:20.225 --> 00:06:22.965

and, uh, personnel participation in flight testing.

127

00:06:23.665 --> 00:06:27.085

The appendices include appendix C,

128

00:06:27.375 --> 00:06:29.285

which is a further description

129

00:06:29.285 --> 00:06:30.325

of the risk management process.

130

00:06:30.585 --> 00:06:33.245

So the document is called risk management,

131

00:06:33.345 --> 00:06:35.365

but you have to get to chapter seven

132

00:06:35.425 --> 00:06:37.765

and Appendix C to actually find the, the meat

133

00:06:37.785 --> 00:06:39.325

of the risk management stuff.

134

00:06:40.425 --> 00:06:45.125

Um, some other, uh, well used appendices are the, uh,

135

00:06:45.125 --> 00:06:48.045

appendix D, the examples of tpha, basically.

136

00:06:49.625 --> 00:06:53.605

And, uh, appendix G, the, uh, typical examples

137

00:06:53.665 --> 00:06:55.445

of flight tests at various risk levels.

138

00:06:55.885 --> 00:06:57.845

A lot of people start from this when they,

139

00:06:57.915 --> 00:06:59.725

when they assess risk levels.

140

00:07:00.745 --> 00:07:05.295

Um, this, this appendix and the keyword here is typical.

141

00:07:06.045 --> 00:07:08.535

Doesn't mean you can't designate a different risk level

142

00:07:08.555 --> 00:07:12.655

for a particular kind of test, um, if you feel that, uh,

143

00:07:13.045 --> 00:07:14.655

that the risk level is different,

144

00:07:14.655 --> 00:07:19.155

and you have, um, uh, reasons for, for changing it.

145

00:07:22.775 --> 00:07:26.435

So the d revision, uh, was begun immediately

146

00:07:26.435 --> 00:07:27.955

after C was published

147

00:07:28.465 --> 00:07:31.075

because we knew that, uh, the document

148

00:07:31.715 --> 00:07:34.155

structure needed some, some, uh, attention.

149

00:07:34.935 --> 00:07:36.075

Uh, we wanted to make sure

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00:07:36.075 --> 00:07:38.435

that it reflects the latest thinking and best practices.

151

00:07:38.435 --> 00:07:39.835

So it was kind of a back to the,

152

00:07:40.055 --> 00:07:43.315

the drawing board build from the bottom up sort of activity,

153

00:07:43.935 --> 00:07:45.875

um, answering frequently asked questions

154

00:07:46.615 --> 00:07:49.955

and, uh, better organized to, uh,

155

00:07:50.175 --> 00:07:52.035

to find the information you want.

156

00:07:52.815 --> 00:07:55.115

Um, here's the focus areas. I'm gonna cover.

157

00:07:55.735 --> 00:07:58.995

The safety report sharing was something that was, uh, well,

158

00:07:58.995 --> 00:08:01.035

we'll get into that, uh, safety report Sharing

159

00:08:01.595 --> 00:08:04.435

FAA risk management process, the flight test, SMS chapter,

160

00:08:05.055 --> 00:08:06.635

and, uh, talk.

161

00:08:06.815 --> 00:08:08.635

I'm going to ask a little bit about, uh,

162

00:08:08.655 --> 00:08:12.275

pre mitigate risk versus post mitigate risk acceptance.

163

00:08:14.225 --> 00:08:18.925

So, uh, um, on the topic of sharing safety reports,

164

00:08:18.945 --> 00:08:23.765

so the c revision started saying, introduced language,

165

00:08:23.765 --> 00:08:27.765

saying that, uh, applicant should share safety reports

166

00:08:27.765 --> 00:08:30.405

with us, and we should share safety reports with applicants,

167

00:08:31.145 --> 00:08:33.525

uh, without much beyond that.

168

00:08:33.665 --> 00:08:35.645

And I'll show the, the current language,

169

00:08:35.645 --> 00:08:37.565

and I'll show the new, the proposed new

170

00:08:37.805 --> 00:08:39.005

language here in a minute.

171

00:08:39.825 --> 00:08:44.005

But what we also had happen during this revision time

172

00:08:45.465 --> 00:08:49.085

was, uh, the new, uh, part five, the SMS rule

173

00:08:49.745 --> 00:08:54.405

in 14 CFR was published, uh, a year ago

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00:08:55.025 --> 00:08:56.685

now in April of 2024.

175

00:08:57.305 --> 00:09:00.325

And it added this paragraph on notification of hazards

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00:09:00.325 --> 00:09:01.605
to interfacing persons.

177

00:09:02.705 --> 00:09:05.805
And, uh, it says that if any, uh, person required

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00:09:05.805 --> 00:09:08.565
to have an SMS identifies a hazard in the operating

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00:09:08.565 --> 00:09:10.725
environment, the person must provide notice of the hazard

180

00:09:11.465 --> 00:09:14.005
to any interfacing person that to the best

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00:09:14.005 --> 00:09:15.565
of the person's knowledge, could address the

182

00:09:15.565 --> 00:09:16.685
hazard or mitigate the risk.

183

00:09:17.625 --> 00:09:19.725
Um, for the purpose of this section,

184

00:09:19.725 --> 00:09:22.285
interfacing persons are those that contribute to the safety

185

00:09:22.305 --> 00:09:24.485
of the certificate or letter of authorization holders,

186

00:09:24.845 --> 00:09:26.845
aviation related products and services.

187

00:09:27.705 --> 00:09:30.645
So a lot of, um, kind of squishy language there

188

00:09:31.315 --> 00:09:33.245
that I think is, uh, going

189

00:09:33.245 --> 00:09:36.445

to be navigated here in the near future as, uh, all

190

00:09:36.445 --> 00:09:41.085

of us work together to implement these, uh, design

191

00:09:41.085 --> 00:09:42.445

and manufacturing SMSs.

192

00:09:44.425 --> 00:09:48.365

But this, um, has interesting implications for the sharing

193

00:09:48.365 --> 00:09:51.325

of safety reports, which I'll get into here.

194

00:09:51.985 --> 00:09:54.645

Uh, we understand that there's a tension between sharing

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00:09:54.645 --> 00:09:57.285

of safety information, which we're all here to do today,

196

00:09:58.505 --> 00:10:01.565

and the compromise of proprietary intellectual property.

197

00:10:01.565 --> 00:10:03.565

You're all running businesses, you're all competing,

198

00:10:03.785 --> 00:10:04.885

you're all trying to make money.

199

00:10:04.945 --> 00:10:06.365

We get that. Um,

200

00:10:06.585 --> 00:10:10.045

and we want to, um, pay attention to that as we try

201

00:10:10.045 --> 00:10:11.685

to craft this language.

202

00:10:12.505 --> 00:10:16.045

Um, so bottom line is the more people that are aware

203

00:10:16.045 --> 00:10:17.565
of hazards, risks, and risk controls,

204

00:10:17.565 --> 00:10:18.965
the the safer we'll all be.

205

00:10:19.825 --> 00:10:22.685
And SETP and SFTE were both founded on that idea.

206

00:10:22.705 --> 00:10:24.725
The more lessons are shared, the more people can learn them,

207

00:10:25.705 --> 00:10:27.045
uh, or attempt to learn them.

208

00:10:28.105 --> 00:10:30.765
And, uh, we're also very aware of the workload required

209

00:10:30.825 --> 00:10:32.925
for commercial flight testers to get a lessons learned,

210

00:10:32.925 --> 00:10:34.005
presentation vetted

211

00:10:34.005 --> 00:10:36.085
through legal media relations, et cetera.

212

00:10:36.545 --> 00:10:38.565
We know that when you guys present up here, it's,

213

00:10:38.565 --> 00:10:42.205
it's the end of a long process of getting all that approved,

214

00:10:42.585 --> 00:10:45.925
um, so that you can share lessons learned, share lessons

215

00:10:45.995 --> 00:10:47.605
that may be learned by the rest of us.

216

00:10:50.345 --> 00:10:54.965

So with that in mind, um, I show the,

217

00:10:55.065 --> 00:10:56.405
the old language on the left

218

00:10:56.405 --> 00:10:57.645
and the new language on the right.

219

00:10:57.745 --> 00:10:59.365
In this case, there is no old

220

00:10:59.605 --> 00:11:00.685
language that covers this topic.

221

00:11:00.825 --> 00:11:03.085
So I'm gonna, we want to start off this section

222

00:11:03.085 --> 00:11:04.365
of the document saying,

223

00:11:05.645 --> 00:11:07.365
A strong reporting culture is essential

224

00:11:07.365 --> 00:11:08.725
to effective safety assurance.

225

00:11:08.995 --> 00:11:11.525
When FAA crew members fly on TIA flights,

226

00:11:11.995 --> 00:11:14.765
they do not have the benefit of the experience of months

227

00:11:14.825 --> 00:11:17.085
or years of developmental testing on the aircraft

228

00:11:17.705 --> 00:11:18.925
in the spirit of informing

229

00:11:18.925 --> 00:11:20.365
and preparing FAA crew members

230
00:11:20.505 --> 00:11:23.565
so they can be valuable contributors in an emergent

231
00:11:23.965 --> 00:11:25.525
situation, colon.

232
00:11:25.745 --> 00:11:27.405
And then we go through the next sections.

233
00:11:27.995 --> 00:11:31.685
This topic has already been mentioned at this event, uh,

234
00:11:31.715 --> 00:11:36.285
this week, and I appreciate, um, that, uh, that

235
00:11:36.285 --> 00:11:39.325
that is recognized that, uh, when we get on the flight,

236
00:11:39.385 --> 00:11:41.685
you want us to be valuable contributors to the mission,

237
00:11:41.745 --> 00:11:45.885
and you want us to understand the system under test as,

238
00:11:45.985 --> 00:11:47.045
as well as you do.

239
00:11:47.505 --> 00:11:49.245
Um, and we, we strive for that,

240
00:11:49.265 --> 00:11:50.485
but it's not always possible.

241
00:11:51.065 --> 00:11:54.325
Um, especially in the case of knowing the history of,

242
00:11:54.385 --> 00:11:56.485
of the item, um, you,

243
00:11:56.505 --> 00:11:58.805

you're always gonna know more about it than we do.

244

00:11:59.545 --> 00:12:03.125

So, uh, in the, in the spirit of trying

245

00:12:03.125 --> 00:12:05.965

to educate us on the history of the, the, um,

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00:12:06.585 --> 00:12:10.445

the system under test, this is what we're striving for.

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00:12:11.105 --> 00:12:14.765

So we've got the old language on the left, which said, uh,

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00:12:15.465 --> 00:12:18.605

DRS ODAs and applicants are strongly encouraged

249

00:12:18.605 --> 00:12:20.445

to submit safety significant events

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00:12:20.545 --> 00:12:21.645

in accordance with this order.

251

00:12:22.305 --> 00:12:24.005

The new language says ODAs

252

00:12:24.065 --> 00:12:26.685

and applicants with an FAA approved risk management process

253

00:12:26.865 --> 00:12:31.385

are required to have a process for sharing

254

00:12:31.385 --> 00:12:32.545

with FAA flight tests.

255

00:12:32.555 --> 00:12:34.265

Those safety reports relevant

256

00:12:34.885 --> 00:12:36.905

to TIA certification flight tests.

257

00:12:37.085 --> 00:12:38.785

So it's a requirement,

258

00:12:39.125 --> 00:12:40.745

but there's some wiggle room in there.

259

00:12:41.245 --> 00:12:42.625

We don't want all your dirty laundry,

260

00:12:42.725 --> 00:12:44.465

we don't want every safety report you've ever

261

00:12:45.015 --> 00:12:47.665

submitted on the whole system from day one.

262

00:12:48.005 --> 00:12:50.185

We just want the ones that you think

263

00:12:50.965 --> 00:12:53.065

we should know about when we get on the airplane

264

00:12:53.065 --> 00:12:55.225

to do TIA certification flight test.

265

00:12:59.515 --> 00:13:01.345

Again, no old language for this part.

266

00:13:01.815 --> 00:13:05.225

This, this is gonna refer to the part five FSMS changes.

267

00:13:05.245 --> 00:13:06.865

So applicants required to operate

268

00:13:07.545 --> 00:13:10.545

a part five SMS may be required to share hazard data,

269

00:13:11.355 --> 00:13:13.785

which we think could be safety reports.

270

00:13:14.325 --> 00:13:18.785

Ses, um, is what we call 'em with FAA flight test

271

00:13:18.805 --> 00:13:22.825

as an interfacing person under 14 c, FFR 5 57

272

00:13:23.645 --> 00:13:26.865

and TCPC holders are required to submit a summary

273

00:13:26.965 --> 00:13:29.625

of the confidential employee reports to the administrator.

274

00:13:29.675 --> 00:13:30.985

We're not sure who that is yet.

275

00:13:31.045 --> 00:13:34.345

We think it's going to be the certificate management section

276

00:13:34.535 --> 00:13:36.905

that o Old Air 800, the MIT o folks.

277

00:13:37.845 --> 00:13:39.625

Um, we think that's who's gonna get

278

00:13:39.625 --> 00:13:40.785

that report every six months.

279

00:13:42.085 --> 00:13:43.745

And, uh, we're gonna be interested.

280

00:13:44.365 --> 00:13:47.105

Flight test FAA flight test is gonna be interested in,

281

00:13:47.125 --> 00:13:48.185

in that report as well.

282

00:13:49.285 --> 00:13:49.505

Um,

283

00:13:53.965 --> 00:13:57.395

again, um, no old language to compare this to, but DR

284
00:13:57.395 --> 00:14:00.355
and applicants without an FAA approved risk management

285
00:14:00.665 --> 00:14:04.195
process are still strongly encouraged to report SES

286
00:14:04.215 --> 00:14:06.515
to the flight test section responsible for their oversight.

287
00:14:08.655 --> 00:14:13.635
So, just to be clear, this section says, for an ODA

288
00:14:13.815 --> 00:14:16.275
or an applicant with an FA accepted risk management process

289
00:14:16.415 --> 00:14:18.675
are required to dot.

290
00:14:19.215 --> 00:14:22.635
If you don't have that, you're strongly encouraged.

291
00:14:31.545 --> 00:14:34.565
Uh, this gets to the crux of the matter of, uh,

292
00:14:34.595 --> 00:14:37.565
what makes you all nervous about

293
00:14:37.565 --> 00:14:38.845
sharing information with us.

294
00:14:39.665 --> 00:14:43.885
Um, and that is that once it leaves your control, it's out

295
00:14:43.885 --> 00:14:48.165
of your control, and you have to trust the person you give

296
00:14:48.165 --> 00:14:51.685
that information to, to control it just as you would

297
00:14:51.705 --> 00:14:56.325

to take, uh, and to make sure that it doesn't, um, get, uh,

298

00:14:56.345 --> 00:14:57.485

beyond where it should.

299

00:14:58.985 --> 00:15:01.525

So the old language personal applicant identifying

300

00:15:01.525 --> 00:15:04.005

information will be removed to ensure the confidentiality

301

00:15:04.185 --> 00:15:06.205

of safety significant event submitters

302

00:15:06.955 --> 00:15:08.325

proprietary data cannot

303

00:15:08.385 --> 00:15:10.845

and will not be shared outside the FAA new language.

304

00:15:10.895 --> 00:15:14.205

We're trying to address that discomfort that, uh,

305

00:15:14.265 --> 00:15:18.205

we know exists, um, with some more

306

00:15:18.705 --> 00:15:20.365

of the legal citations here.

307

00:15:20.385 --> 00:15:24.045

So, applicant slash oda slash DR report should be marked

308

00:15:24.045 --> 00:15:25.125

voluntarily submitted,

309

00:15:25.585 --> 00:15:28.805

and if they contain proprietary data marked proprietary

310

00:15:29.535 --> 00:15:32.605

prior to submission, the FAA is required

311
00:15:32.605 --> 00:15:36.285
to protect proprietary data under Title 18, US Code 1905

312
00:15:36.955 --> 00:15:39.405
proprietary data cannot and will not be shared outside.

313
00:15:39.405 --> 00:15:43.525
The F-A-A-S-M-S data are protected from FOIA under

314
00:15:43.855 --> 00:15:46.565
49 US code, et cetera, et cetera.

315
00:15:47.865 --> 00:15:49.725
If there's some caveats here,

316
00:15:50.585 --> 00:15:55.245
if the data has been voluntarily submitted, um, and is not

317
00:15:55.245 --> 00:15:56.965
otherwise required by regulation.

318
00:15:57.065 --> 00:16:00.925
So we kind of shot ourselves in the foot when that paragraph

319
00:16:00.925 --> 00:16:03.045
to part five was added.

320
00:16:03.625 --> 00:16:06.645
So there's some, some nuances here that I'm still trying

321
00:16:06.645 --> 00:16:08.605
to navigate to make sure this language is correct

322
00:16:09.145 --> 00:16:12.725
and to make sure that your data will be protected the way we

323
00:16:12.725 --> 00:16:14.285
say it is and the way we want it to be,

324
00:16:14.625 --> 00:16:15.685

so that this all works.

325

00:16:15.865 --> 00:16:19.645

And so that, um, so that lessons can be learned.

326

00:16:20.665 --> 00:16:22.885

Um, submitters are highly encouraged

327

00:16:22.885 --> 00:16:24.205

to sanitizer submissions

328

00:16:24.205 --> 00:16:26.245

of proprietary data enabling wider sharing.

329

00:16:26.665 --> 00:16:30.765

And then, um, okay, not this one, but the next one.

330

00:16:30.785 --> 00:16:32.845

So this is just the format.

331

00:16:33.145 --> 00:16:35.765

You may use the seven 10 SSE report format,

332

00:16:36.815 --> 00:16:39.685

which is now added as an appendix to the document.

333

00:16:39.685 --> 00:16:41.765

So you'll be able to have the format right there,

334

00:16:42.065 --> 00:16:44.725

or a suitable alternate format if you have a report format.

335

00:16:45.585 --> 00:16:47.165

Um, and,

336

00:16:47.185 --> 00:16:50.045

and your section safety officer that you deal with is,

337

00:16:50.105 --> 00:16:52.485

is okay with that format, then you can just use your,

338
00:16:52.795 --> 00:16:54.605
your own format if you have an internal

339
00:16:54.785 --> 00:16:55.885
safety report format.

340
00:16:57.585 --> 00:17:02.285
Um, so this is the part where

341
00:17:03.145 --> 00:17:04.325
we share our data with you.

342
00:17:04.325 --> 00:17:07.085
And the, so the old document, the current document,

343
00:17:07.245 --> 00:17:10.045
I should say, says, in the interest of sharing safety data,

344
00:17:10.065 --> 00:17:13.005
the FAA should also share their SSE data with applicants.

345
00:17:13.005 --> 00:17:14.485
And I know that makes a lot of people nervous.

346
00:17:14.765 --> 00:17:18.925
'cause now if we have an SSE that happened on your airplane

347
00:17:18.925 --> 00:17:20.045
during a TIA test,

348
00:17:20.145 --> 00:17:21.925
and then we share that with your competitor,

349
00:17:22.915 --> 00:17:24.805
that could be a bad thing for you.

350
00:17:25.385 --> 00:17:27.525
And we, we don't do that right now,

351
00:17:27.545 --> 00:17:28.725

and we don't intend to do that.

352

00:17:29.145 --> 00:17:30.325

So here's what we intend to do.

353

00:17:30.325 --> 00:17:31.925

In the interest of sharing safety data,

354

00:17:32.665 --> 00:17:35.365

the FAA should also share their SSE data

355

00:17:35.365 --> 00:17:36.765

with the appropriate entities

356

00:17:36.765 --> 00:17:39.165

that can address a hazard or mitigate risk.

357

00:17:39.345 --> 00:17:40.885

So that's the language from part five.

358

00:17:42.035 --> 00:17:44.845

Sharing of any SSE will be coordinated

359

00:17:44.845 --> 00:17:47.605

with the involved entities before wider dissemination.

360

00:17:47.705 --> 00:17:50.645

For example, example, if an SSE is generated

361

00:17:50.645 --> 00:17:51.685

during a TIA flight

362

00:17:51.685 --> 00:17:55.125

with company XFAA flight test would coordinate

363

00:17:55.125 --> 00:17:57.165

with Company X and get their permission

364

00:17:57.305 --> 00:17:59.725

before sharing the SSE with company Y

365
00:18:00.265 --> 00:18:01.725
or with the flight test community.

366
00:18:01.825 --> 00:18:03.365
So we're basically gonna,

367
00:18:03.425 --> 00:18:05.325
before your information goes anywhere,

368
00:18:05.325 --> 00:18:07.485
we're gonna get your permission to share it

369
00:18:08.265 --> 00:18:11.685
in whatever format or content that you approve.

370
00:18:11.815 --> 00:18:14.725
We're not gonna, we're we're trying to convince you

371
00:18:14.725 --> 00:18:17.565
that we're gonna take care of your data, uh, your,

372
00:18:17.595 --> 00:18:18.685
your information

373
00:18:19.225 --> 00:18:21.725
and not, uh, let it go somewhere you don't want it to go.

374
00:18:27.345 --> 00:18:29.365
Um, one of the things that has occurred

375
00:18:29.365 --> 00:18:34.045
to me in this whole evolution is that if the FA is going

376
00:18:34.045 --> 00:18:37.285
to mandate, mandate, all this data sharing, um,

377
00:18:37.985 --> 00:18:39.125
should it provide a tool

378
00:18:39.125 --> 00:18:40.645

where these data can be safely shared

379

00:18:40.645 --> 00:18:42.645

and protected, IE some sort of website

380

00:18:42.645 --> 00:18:45.525

that you have a sign into, and, um,

381

00:18:47.465 --> 00:18:50.165

and, and that, um, that all

382

00:18:50.165 --> 00:18:52.165

that information can be shared and protected.

383

00:18:53.145 --> 00:18:55.925

Um, I don't know if that's happening yet.

384

00:18:56.125 --> 00:18:59.365

I know there, there are lots of sectors in the FAA part 21.

385

00:18:59.365 --> 00:19:03.325

Part 1 21 has required SMSs for quite a while,

386

00:19:03.875 --> 00:19:06.125

including this kind of data sharing.

387

00:19:06.985 --> 00:19:10.725

Um, and now airports are required to have an SMS

388

00:19:10.945 --> 00:19:13.005

and part 1 35,

389

00:19:13.465 --> 00:19:16.605

and, um, several other sectors.

390

00:19:16.705 --> 00:19:21.085

So design and manufacturing, all of those folks have SMSs

391

00:19:21.105 --> 00:19:23.165

and are required to share hazard information,

392

00:19:23.165 --> 00:19:27.765

hazard information, um, with interfacing persons.

393

00:19:28.745 --> 00:19:33.605

So, uh, I feel like that, uh, it would be great if we,

394

00:19:33.895 --> 00:19:36.525

after we mandate such a thing, we should provide you a tool

395

00:19:36.525 --> 00:19:38.285

to do it, um, where it's easy.

396

00:19:38.785 --> 00:19:41.525

And, um, I don't want to invent that,

397

00:19:42.305 --> 00:19:46.045

but, uh, I, I will be involved in the inventing of that if,

398

00:19:46.105 --> 00:19:47.925

if nobody else is working on it.

399

00:19:48.105 --> 00:19:50.485

I'm, I'm gonna try to see what we can do about that.

400

00:19:55.755 --> 00:19:58.535

So that sharing of safety reports, um,

401

00:19:59.915 --> 00:20:02.535

the accepted RM process, I talked about this last year.

402

00:20:02.715 --> 00:20:05.495

I'm just gonna highlight some of the, the language that we,

403

00:20:05.595 --> 00:20:10.255

uh, are looking at as far as what, what will be required

404

00:20:10.555 --> 00:20:12.335

to get the RM process accepted.

405

00:20:12.875 --> 00:20:16.375

Um, here's the old, the current language, I should say, um,

406

00:20:17.075 --> 00:20:18.255
to be found acceptable

407

00:20:18.435 --> 00:20:20.375
by the Cognizant Flight Test Organization.

408

00:20:20.395 --> 00:20:23.135
The applicant's risk management process must comply

409

00:20:23.675 --> 00:20:25.695
at a minimum with the requirements of this order.

410

00:20:26.025 --> 00:20:27.255
Again, kind of squishy

411

00:20:27.995 --> 00:20:30.455
and acceptance must be formally documented.

412

00:20:30.755 --> 00:20:33.175
So not much guidance there and,

413

00:20:33.355 --> 00:20:36.335
and no criteria on what it takes to get accepted.

414

00:20:37.195 --> 00:20:40.215
So I want to clarify, uh, what oversight looks like,

415

00:20:40.245 --> 00:20:42.135
what the benefits are to the applicant of,

416

00:20:42.195 --> 00:20:44.815
of getting this FAA accepted risk management process

417

00:20:45.765 --> 00:20:47.485
applicability to ODAs.

418

00:20:47.485 --> 00:20:48.845
That's been a question all along.

419

00:20:49.985 --> 00:20:51.845

And, uh, requirements for acceptance.

420

00:20:51.945 --> 00:20:55.565

So let's look at, um, what it gives you.

421

00:20:55.785 --> 00:20:58.605

So if you have an FAA accepted risk management process,

422

00:20:59.425 --> 00:21:02.525

it allows you to conduct your risk management review,

423

00:21:02.595 --> 00:21:05.965

whether that takes the form of an SRBA formal meeting board

424

00:21:06.785 --> 00:21:09.965

or a desktop review where you, where you sequentially run it

425

00:21:09.965 --> 00:21:12.405

through by email or however you do it.

426

00:21:13.185 --> 00:21:14.685

Uh, you can do that process,

427

00:21:14.915 --> 00:21:17.725

that risk management review without direct FA involvement.

428

00:21:17.785 --> 00:21:20.765

So it's one or two fewer people you have to schedule around.

429

00:21:21.745 --> 00:21:26.125

Uh, and that's worth it for many folks to, to get this,

430

00:21:26.305 --> 00:21:27.645

um, acceptance.

431

00:21:29.505 --> 00:21:30.805

Uh, we maybe choose to,

432

00:21:30.905 --> 00:21:33.325

to be involved in the RN process for any project.

433

00:21:34.145 --> 00:21:37.805

Um, but, uh, most, with most applicants who have this,

434

00:21:37.805 --> 00:21:39.725

we get an rhythm and we know which ones we want

435

00:21:39.725 --> 00:21:41.165

to be involved in and which ones we don't.

436

00:21:42.465 --> 00:21:45.765

Uh, the FAA accepted risk management process does not allow

437

00:21:45.765 --> 00:21:48.925

an applicant to sign the risk management block on a TIA.

438

00:21:48.985 --> 00:21:51.805

So remember, there's a, there's a TIA acceptance,

439

00:21:51.805 --> 00:21:52.925

and then there's the risk management

440

00:21:52.925 --> 00:21:54.205

acceptance on a different page.

441

00:21:55.065 --> 00:21:57.125

Um, and just, just

442

00:21:57.125 --> 00:21:58.805

because you have the accepted RM process,

443

00:21:59.795 --> 00:22:03.245

that doesn't mean you can accept the risk on the TIA.

444

00:22:03.265 --> 00:22:05.645

That's still an FAA function.

445

00:22:05.875 --> 00:22:07.925

However, it could allow o ds

446
00:22:07.925 --> 00:22:11.285
to sign the risk management block that happens today, uh,

447
00:22:11.425 --> 00:22:12.845
on a TIA, that if

448
00:22:12.845 --> 00:22:15.285
that authority is granted in the ODA procedures manual,

449
00:22:15.795 --> 00:22:17.445
this only applies to TIA flying.

450
00:22:17.545 --> 00:22:21.525
So, um, just kind of making it clear what,

451
00:22:21.715 --> 00:22:23.405
what the accepted process gives you.

452
00:22:25.745 --> 00:22:27.605
And here's the criteria for acceptance.

453
00:22:27.635 --> 00:22:28.765
It's a, it's a long list.

454
00:22:28.765 --> 00:22:31.525
There's 12 here, and they've changed a little bit, um,

455
00:22:31.815 --> 00:22:33.205
since I presented this last year.

456
00:22:33.305 --> 00:22:37.565
So, um, first one is, um, an RM process that complies

457
00:22:37.565 --> 00:22:38.725
with the order, kind of the,

458
00:22:38.905 --> 00:22:40.845
the original paragraph that we started with.

459
00:22:41.785 --> 00:22:44.525

And you must define, uh, the equivalence

460

00:22:44.545 --> 00:22:46.925

to the required RM review participants.

461

00:22:46.985 --> 00:22:49.805

So when you do an SRB, you should tell us

462

00:22:49.805 --> 00:22:52.365

who your required SRB attendees are

463

00:22:53.065 --> 00:22:55.125

or who's required in that desktop review process.

464

00:22:56.585 --> 00:22:58.245

Uh, FAA will be able to review

465

00:22:58.245 --> 00:22:59.845

and audit the applicant's RM process,

466

00:23:01.045 --> 00:23:02.085

demonstrated company history

467

00:23:02.085 --> 00:23:05.045

of TIA flying high quality risk management documentation,

468

00:23:05.795 --> 00:23:09.765

appropriate risk level assignment, um, high level of trust,

469

00:23:10.025 --> 00:23:12.045

as evidenced by open and productive communication

470

00:23:12.045 --> 00:23:13.405

between the FAA and the applicant.

471

00:23:14.075 --> 00:23:16.445

Applicant should not be reluctant to share problems,

472

00:23:16.445 --> 00:23:18.205

lessons learned, or setbacks with a project.

473

00:23:18.945 --> 00:23:20.205

And here's one for y'all.

474

00:23:20.345 --> 00:23:24.045

Uh, active participation in S-E-T-P-S-F-T-E Flight Test

475

00:23:24.045 --> 00:23:25.525

Safety Workshop, A I A A

476

00:23:25.525 --> 00:23:28.405

and other industry organizations can also demonstrate

477

00:23:28.405 --> 00:23:29.885

willingness to communicate openly.

478

00:23:30.985 --> 00:23:35.845

Um, we do like to see you all here, a designated

479

00:23:35.865 --> 00:23:37.965

and trained flight test safety officer or manager.

480

00:23:38.545 --> 00:23:41.925

And the C chapter three, chapter three is the SMS chapter,

481

00:23:41.985 --> 00:23:43.085

the new SMS chapter.

482

00:23:43.785 --> 00:23:46.285

And that refers to the safety promotion

483

00:23:46.515 --> 00:23:48.485

paragraph about training.

484

00:23:48.825 --> 00:23:51.405

So there's, uh, some information there about, uh,

485

00:23:51.405 --> 00:23:52.685

flight test safety officers.

486

00:23:54.355 --> 00:23:57.325

Applicant developed briefing guide should look like the, uh,

487

00:23:57.425 --> 00:23:58.725
the one in the document.

488

00:23:58.865 --> 00:24:01.045
So Appendix B is still the flight test briefing guide.

489

00:24:02.625 --> 00:24:06.125
Um, for an ODA, you have to define

490

00:24:06.145 --> 00:24:07.925
who can sign the TIA risk management

491

00:24:07.925 --> 00:24:09.205
block for each risk level.

492

00:24:10.145 --> 00:24:11.685
Um, this should be a manager

493

00:24:11.785 --> 00:24:13.525
who oversees flight test operations

494

00:24:13.585 --> 00:24:15.045
or someone in their chain of command,

495

00:24:15.825 --> 00:24:18.285
the manager's signature in the TIA Risk management block

496

00:24:18.285 --> 00:24:20.005
means that the manager has determined

497

00:24:20.005 --> 00:24:21.965
that the RM process was done correctly.

498

00:24:22.725 --> 00:24:24.285
IE the hazards have been identified,

499

00:24:24.285 --> 00:24:26.085
the risk level is correct, and the risks have been

500
00:24:26.085 --> 00:24:27.365
mitigated to an acceptable level.

501
00:24:27.365 --> 00:24:28.965
That's what that signature means.

502
00:24:28.965 --> 00:24:31.365
On the TIA Risk acceptance block,

503
00:24:34.995 --> 00:24:37.815
um, confidential non-punitive safety reporting process.

504
00:24:38.905 --> 00:24:42.375
Again, referring to chapter three, the SMS chapter, um,

505
00:24:43.315 --> 00:24:45.135
the applicant must have a process for sharing

506
00:24:45.135 --> 00:24:47.655
with FAA flight tests, those safety reports relevant

507
00:24:47.655 --> 00:24:49.175
to TIA certification flight tests.

508
00:24:50.075 --> 00:24:52.455
For example, if an event occurred during company test

509
00:24:52.595 --> 00:24:55.135
and it could recur during certification test, share

510
00:24:55.135 --> 00:24:56.295
that event with FAA flight test.

511
00:24:56.715 --> 00:24:57.775
If an event occurred

512
00:24:57.775 --> 00:25:00.575
because of a certain way of flying a flight test technique,

513
00:25:00.705 --> 00:25:04.015

share that event with FAA flight test, all in the interest

514

00:25:04.015 --> 00:25:06.495
of making us a valuable crew member on

515

00:25:06.495 --> 00:25:07.775
your, on your aircraft.

516

00:25:09.635 --> 00:25:11.375
The applicant must have risk controls

517

00:25:11.375 --> 00:25:12.775
that address the following hazards.

518

00:25:12.775 --> 00:25:14.855
And this is straight out of the, uh, the ODA manual,

519

00:25:15.175 --> 00:25:16.255
actually lack of proficiency

520

00:25:16.355 --> 00:25:19.575
or currency, lack of fitness for duty, fatigue,

521

00:25:19.575 --> 00:25:20.775
and emergency response.

522

00:25:21.355 --> 00:25:23.095
Um, and this would normally take the form

523

00:25:23.095 --> 00:25:24.295
of a flight operations manual

524

00:25:26.075 --> 00:25:28.975
and periodic review of accidents, incidents

525

00:25:28.975 --> 00:25:31.135
and safety reports, mandatory safety meetings,

526

00:25:31.755 --> 00:25:33.335
and we strongly recommend a flight test.

527
00:25:33.495 --> 00:25:37.095
SMS, uh, periodic self audits of the risk management process

528
00:25:37.315 --> 00:25:38.495
and high level CRM

529
00:25:38.495 --> 00:25:41.615
and aeronautical decision making, uh, the flight test.

530
00:25:41.815 --> 00:25:45.535
SMS one is, is, seems like it might be overcome by events,

531
00:25:45.535 --> 00:25:47.055
especially for TCPC holders.

532
00:25:47.055 --> 00:25:50.175
You're required to have an SMS for manufacturing.

533
00:25:50.475 --> 00:25:53.975
And I consider flight test a critical part of manufacturing.

534
00:25:54.275 --> 00:25:55.895
And so that probably means

535
00:25:55.895 --> 00:25:57.335
you're required to have a flight test.

536
00:25:57.575 --> 00:25:59.175
SMS, um,

537
00:26:02.495 --> 00:26:05.465
onto the SMS chapter that I've mentioned a couple times.

538
00:26:05.965 --> 00:26:08.865
So the, the chapter is, is basically guidelines.

539
00:26:08.865 --> 00:26:11.465
It's not requirements, um, for,

540
00:26:11.565 --> 00:26:13.105

for anybody interested in implementing

541

00:26:13.105 --> 00:26:14.185
or improving a flight test.

542

00:26:14.625 --> 00:26:19.505
SMS, again, uh, we're trying to get that NTSB uh,

543

00:26:19.825 --> 00:26:21.505
recommend safety recommendation addressed

544

00:26:22.405 --> 00:26:24.105
the C version didn't make them happy,

545

00:26:24.125 --> 00:26:25.545
and they called that unacceptable.

546

00:26:26.165 --> 00:26:27.345
Um, I'm not happy with that.

547

00:26:27.405 --> 00:26:28.905
So I want to get it to, uh,

548

00:26:28.965 --> 00:26:30.705
to a different answer from the NTSB.

549

00:26:30.725 --> 00:26:33.025
So we've added a whole chapter on SMS.

550

00:26:33.615 --> 00:26:35.985
It's arranged obviously around the other three pillars.

551

00:26:35.985 --> 00:26:37.745
There's a whole chapter on risk management,

552

00:26:38.245 --> 00:26:40.945
and then the SMS chapter covers safety policy,

553

00:26:41.005 --> 00:26:42.825
safety promotion, and safety assurance.

554
00:26:43.745 --> 00:26:46.685
Um, and it's all flight test specific stuff.

555
00:26:46.905 --> 00:26:49.045
So we're not telling you how to do an SMS we're telling you

556
00:26:49.045 --> 00:26:52.285
how to do or suggestions for a flight test.

557
00:26:52.525 --> 00:26:56.085
SMS for example, in the safety policy part, we say

558
00:26:57.305 --> 00:27:00.285
you may want to talk about a no vote in your safety policy.

559
00:27:00.385 --> 00:27:03.165
If that's something that you advocate for

560
00:27:03.345 --> 00:27:05.565
or you have in your company, maybe mention

561
00:27:05.565 --> 00:27:08.765
that in the safety policy so that it's part of your,

562
00:27:09.465 --> 00:27:12.805
you know, part of your culture that your leadership is, is,

563
00:27:12.865 --> 00:27:14.965
um, describing to its folks.

564
00:27:15.825 --> 00:27:18.405
Uh, other tidbits. This is a flow chart for, um,

565
00:27:20.345 --> 00:27:22.645
for the risk management review and acceptance process.

566
00:27:22.985 --> 00:27:24.125
I'm not gonna go through this here,

567
00:27:24.185 --> 00:27:28.445

but, um, we, we, as, as, as we ourselves, the, the team was,

568

00:27:28.945 --> 00:27:31.125

was working on the document, we kind of needed to,

569

00:27:31.745 --> 00:27:33.605

to di diagram this out for ourselves.

570

00:27:33.625 --> 00:27:35.965

So we thought we'd, we'd throw the flow flow chart in here

571

00:27:35.965 --> 00:27:37.605

to help other folks understand the process.

572

00:27:38.435 --> 00:27:39.725

This helps you understand

573

00:27:39.825 --> 00:27:42.285

who signs which block on the TIA

574

00:27:42.285 --> 00:27:43.645

basically is what it comes down to.

575

00:27:47.945 --> 00:27:51.805

Um, the two examples of tpha in the,

576

00:27:52.025 --> 00:27:53.845

in the document have been there for a long time.

577

00:27:54.585 --> 00:27:58.405

Um, I decided to make a bow tie out of the one

578

00:27:58.405 --> 00:28:01.245

that's been in there for your, for a decade or two.

579

00:28:01.985 --> 00:28:04.965

Um, so this is a bow tie of the low altitude stall,

580

00:28:05.165 --> 00:28:07.405

THA example, um, just so

581

00:28:07.405 --> 00:28:09.605

that folks can see a different way of doing it.

582

00:28:09.605 --> 00:28:13.645

Another way of doing a THA, um, there's text that goes along

583

00:28:13.645 --> 00:28:17.875

with this, but, um, uh, uh, so

584

00:28:17.895 --> 00:28:19.035

that's in, in there.

585

00:28:19.335 --> 00:28:23.315

Um, we advocate that you, uh, you know, the,

586

00:28:23.335 --> 00:28:25.675

the document is all about flight test risk management.

587

00:28:26.335 --> 00:28:29.395

Of course, there are risks that we expose ourselves

588

00:28:29.395 --> 00:28:31.675

to simply by operating airplanes, aircraft.

589

00:28:32.375 --> 00:28:35.755

Um, and we should also be addressing those risks when we

590

00:28:35.755 --> 00:28:36.795

go operate an aircraft.

591

00:28:37.375 --> 00:28:41.955

So we advocate for, uh, an ORM process to, to address that.

592

00:28:41.975 --> 00:28:45.115

And, and we throw our ORM worksheet in, uh,

593

00:28:45.255 --> 00:28:46.795

as an appendix, as an example.

594

00:28:50.535 --> 00:28:52.795

One of the things I'm interested in hearing from you all

595

00:28:52.795 --> 00:28:55.435

about, we're still on the, well, we think we know

596

00:28:55.435 --> 00:28:56.475

what we wanna say about this.

597

00:28:57.855 --> 00:29:00.395

We know that there are, um, some organizations

598

00:29:00.425 --> 00:29:04.235

that accept risk based on post mitigated risk level.

599

00:29:05.095 --> 00:29:07.195

We don't want to say anything about that

600

00:29:07.195 --> 00:29:08.435

because we think, well,

601

00:29:08.435 --> 00:29:10.595

the fourth principle stated in the document is right there.

602

00:29:10.615 --> 00:29:13.675

The risk management acceptance should be made

603

00:29:13.775 --> 00:29:14.835

at the appropriate level.

604

00:29:15.285 --> 00:29:17.635

Acceptance of residual risk should be made at a level

605

00:29:17.635 --> 00:29:19.955

commensurate with the pre mitigate level of risk.

606

00:29:20.195 --> 00:29:22.955

IE the higher the pred risk, the higher the level

607

00:29:22.955 --> 00:29:24.035

of management acceptance.

608
00:29:24.665 --> 00:29:26.635
Some other presenter here today said the same thing.

609
00:29:27.495 --> 00:29:29.635
Uh, the risk acceptor should be a flight test manager

610
00:29:29.655 --> 00:29:31.075
or someone in their chain of command.

611
00:29:31.935 --> 00:29:35.755
Um, so in the, in, if anyone has any comments on this, uh,

612
00:29:35.935 --> 00:29:37.835
I'm interested in hearing, um,

613
00:29:38.575 --> 00:29:42.925
why you might use post mitigated risk to determine the level

614
00:29:42.945 --> 00:29:44.205
of your risk acceptor.

615
00:29:45.665 --> 00:29:48.725
Um, so at, at comments time, please,

616
00:29:48.785 --> 00:29:50.125
please chip in with that.

617
00:29:50.955 --> 00:29:54.925
Also, interested if anyone, um, how, how folks handle their,

618
00:29:55.105 --> 00:29:58.805
uh, if you require safety reports for certain events.

619
00:29:59.065 --> 00:30:03.845
For instance, if you have a 49 CFR 8 38 accident

620
00:30:03.865 --> 00:30:06.965
or incident, IE you have to report it to the NTSB.

621
00:30:07.585 --> 00:30:09.245

Do you require your folks

622

00:30:09.245 --> 00:30:11.165

to do an internal safety report on those?

623

00:30:12.065 --> 00:30:14.405

Um, and I also wanted to mention that, uh,

624

00:30:15.235 --> 00:30:19.485

that we've been trying to craft a document, um,

625

00:30:19.825 --> 00:30:23.805

called the right stuff just about test plan writing, um,

626

00:30:24.925 --> 00:30:25.965

guidance on, on that.

627

00:30:27.585 --> 00:30:30.645

And that's, uh, close to publication, right? Yeah.

628

00:30:30.945 --> 00:30:33.925

So probably come out about the same time or,

629

00:30:33.985 --> 00:30:35.485

or sooner than this document does.

630

00:30:35.685 --> 00:30:37.165

'cause this document has some,

631

00:30:37.235 --> 00:30:38.805

some more, oops to jump through.

632

00:30:39.505 --> 00:30:44.205

Um, so the next steps

633

00:30:44.205 --> 00:30:46.885

with the document, um, I gotta work with the, uh,

634

00:30:47.545 --> 00:30:51.285

the certificate management folks to determine, um,

635
00:30:51.825 --> 00:30:54.245
how involved we're gonna be in the design and manufacturing.

636
00:30:54.525 --> 00:30:57.045
SMS. This was a topic that we talked about last year,

637
00:30:57.745 --> 00:30:59.005
and it's still unclear.

638
00:30:59.425 --> 00:31:02.485
And, uh, the certificate management folks are still kind

639
00:31:02.485 --> 00:31:04.525
of rolling along thinking, you know,

640
00:31:04.525 --> 00:31:06.725
they're just gonna oversee these SMSs.

641
00:31:06.825 --> 00:31:09.645
And, and I keep telling them, I keep raising my hand

642
00:31:09.645 --> 00:31:10.925
and I'm on some of the committees.

643
00:31:10.925 --> 00:31:14.325
So I'm, my voice is being heard that, you know,

644
00:31:14.325 --> 00:31:17.725
when you manage, when you manufacturing inspectors go

645
00:31:17.725 --> 00:31:21.685
to look at a flight test part of, of a manufacturing SMS,

646
00:31:21.825 --> 00:31:24.565
you may want our input, you may want our help.

647
00:31:24.665 --> 00:31:26.765
You may want to, you know, I think it's gonna be a little

648
00:31:26.765 --> 00:31:27.885

different than what you're thinking.

649

00:31:27.945 --> 00:31:32.605

So, um, so there's progress on that.

650

00:31:32.995 --> 00:31:37.805

There's, uh, as far as the work by the committee of, um,

651

00:31:38.305 --> 00:31:41.885

uh, uh, a self-audit sort of document,

652

00:31:42.775 --> 00:31:45.325

we're not anywhere near knowing what

653

00:31:45.325 --> 00:31:47.285

that should look like from an FA, a point of view.

654

00:31:47.385 --> 00:31:51.085

So, uh, I'm happy to work with that, that subcommittee when,

655

00:31:51.225 --> 00:31:53.605

uh, if, when they get, uh, reinvigorated.

656

00:31:54.185 --> 00:31:56.365

So please, uh, contact me when that happens

657

00:31:56.665 --> 00:31:59.485

and I'll get your questions answered.

658

00:32:00.185 --> 00:32:05.035

Um, so

659

00:32:05.035 --> 00:32:06.035

that's the second bullet there.

660

00:32:06.455 --> 00:32:09.075

Um, we need to get the document through internal review.

661

00:32:09.075 --> 00:32:11.075

It's through one hoop. We, we need one more.

662

00:32:11.575 --> 00:32:13.715

And then we'll send a comment matrix out

663

00:32:13.715 --> 00:32:15.315

to stakeholders including you.

664

00:32:15.735 --> 00:32:17.755

And again, if you want to be one of the people

665

00:32:17.895 --> 00:32:21.395

who provides feedback on this document, identify yourself

666

00:32:21.395 --> 00:32:23.035

to me and, uh, let me know.

667

00:32:23.855 --> 00:32:26.795

And, uh, we'll, uh, try to get it to you for the,

668

00:32:26.975 --> 00:32:28.115

the, that review.

669

00:32:28.705 --> 00:32:31.715

It's not a rule make, it's not a rule, so it doesn't go

670

00:32:31.715 --> 00:32:32.875

through the rulemaking process,

671

00:32:33.575 --> 00:32:35.675

but we recognize that all of you

672

00:32:36.265 --> 00:32:38.955

have a stake in this document, so we want your feedback.

673

00:32:40.145 --> 00:32:41.245

Uh, so we're keeping the lines

674

00:32:41.245 --> 00:32:44.325

of communication open with that.

675

00:32:44.745 --> 00:32:47.725

Um, oh, and, uh, we're trying

676

00:32:47.725 --> 00:32:51.125

to get your feedback from applicants DERs, foreign eaas,

677

00:32:51.485 --> 00:32:54.565

military NTSB, anybody who feels like they, uh,

678

00:32:54.565 --> 00:32:58.085

they use this document and, and want an input on its future.

679

00:33:00.925 --> 00:33:03.265

Any questions? I'm way over.

680

00:33:04.335 --> 00:33:04.625

Yeah,

681

00:33:09.045 --> 00:33:10.185

I'm getting this back on time.

682

00:33:20.595 --> 00:33:23.505

Thank you. So I have a question for you.

683

00:33:23.605 --> 00:33:24.945

One of your slides, you talked about

684

00:33:25.055 --> 00:33:26.345

risk of lack of currency.

685

00:33:27.045 --> 00:33:30.145

Yes. And you have an interface with Air 800. Yes.

686

00:33:30.165 --> 00:33:32.745

So when you're talking to them, can you request

687

00:33:32.745 --> 00:33:35.425

that we're allowed to use our flight test vehicles

688

00:33:35.485 --> 00:33:36.545

for currency?

689

00:33:37.545 --> 00:33:39.225

'cause as it is right now, the, the,

690

00:33:39.725 --> 00:33:43.585

the experimental tickets do not allow us

691

00:33:43.585 --> 00:33:45.345

to fly over densely populated areas,

692

00:33:45.765 --> 00:33:47.825

nor does it allow us to do multiple takeoffs

693

00:33:47.825 --> 00:33:50.785

and landings if you read it black and white.

694

00:33:51.205 --> 00:33:55.065

And so it would be super helpful if we had that capability,

695

00:33:55.235 --> 00:33:57.105

especially if it's covered by our, uh,

696

00:33:57.105 --> 00:33:58.505

experimental operating procedures.

697

00:34:00.175 --> 00:34:03.625

Okay. Is that area 800, or is that flight standards?

698

00:34:04.545 --> 00:34:06.465

I thought it was a item. Okay.

699

00:34:11.985 --> 00:34:13.985

A second. He's right. Yeah, that's,

700

00:34:14.065 --> 00:34:17.185

I I can't chew bubble gum and walk either. So, yeah.

701

00:34:17.815 --> 00:34:21.825

Next, yeah, Addison, um, uh, the intent of the rev d

702

00:34:21.825 --> 00:34:24.665

of the, the, uh, the policy that's, it seems

703

00:34:24.665 --> 00:34:27.025

to be pretty clear on TIA specific testing

704

00:34:28.125 --> 00:34:32.665

and a formal process for the SSE event, um, to do that.

705

00:34:32.845 --> 00:34:35.785

Um, later in your presentation, you had one

706

00:34:35.785 --> 00:34:38.985

that was any other company flight testing and

707

00:34:39.205 --> 00:34:42.705

or anything leading up to CERT testing or TIA testing?

708

00:34:43.585 --> 00:34:47.705

I, I guess my question is around the intent in the, in the,

709

00:34:47.705 --> 00:34:48.985

uh, revision to the policy,

710

00:34:49.485 --> 00:34:53.065

is it you would use the formal process for those

711

00:34:53.685 --> 00:34:55.865

non TIA tests that lead up to it?

712

00:34:56.925 --> 00:34:59.145

Or would you leverage your relationship?

713

00:34:59.295 --> 00:35:00.745

Well, I mean, we're fortunate, uh,

714

00:35:00.745 --> 00:35:04.185

where we are Textron Aviation, we have, we have local, um,

715

00:35:04.915 --> 00:35:07.505

pilot FA representative close relationship.

716

00:35:07.905 --> 00:35:09.705

I think they, they may tell me we don't,

717

00:35:09.765 --> 00:35:11.225

but, uh, they, uh,

718

00:35:11.345 --> 00:35:13.345

I think we have a pretty good relationship with them.

719

00:35:14.485 --> 00:35:17.865

So we do an informal, um, uh, disclosure,

720

00:35:17.865 --> 00:35:19.225

definitely if we have issues.

721

00:35:19.845 --> 00:35:22.265

But do you think the intent is to capture

722

00:35:23.005 --> 00:35:26.825

all the events leading up to TIA with this formal process?

723

00:35:27.605 --> 00:35:29.425

You mean the safety events? Yeah.

724

00:35:30.575 --> 00:35:34.145

Well, um, the intent is to inform your,

725

00:35:34.335 --> 00:35:37.205

your FAA crew members that are gonna be on the aircraft

726

00:35:37.275 --> 00:35:41.685

with you of things that they may need to know

727

00:35:42.225 --> 00:35:45.045

in order to ensure a safe outcome of the flight.

728

00:35:45.265 --> 00:35:49.405

So if you've been having an issue with, you know,

729

00:35:50.115 --> 00:35:51.445

hydraulic leak or something,

730

00:35:51.545 --> 00:35:53.685

and you think that it may happen again on a,

731

00:35:53.685 --> 00:35:57.005

on the cert flight, let us know if

732

00:35:57.825 --> 00:36:00.445

you think you've got that thing taken care of

733

00:36:00.625 --> 00:36:02.325

and you don't think you're ever gonna see it again.

734

00:36:03.895 --> 00:36:06.125

Funny things happen on certification flights

735

00:36:06.125 --> 00:36:07.165

with the FAM board.

736

00:36:07.785 --> 00:36:10.685

Um, we, I can't tell you how many times we've heard,

737

00:36:10.995 --> 00:36:12.205

I've never seen it do that before.

738

00:36:13.345 --> 00:36:16.685

Um, and we understand that it's, it is,

739

00:36:16.685 --> 00:36:18.365

you're still in the infant mortality stage

740

00:36:18.365 --> 00:36:19.645

and weird things still happen.

741

00:36:19.745 --> 00:36:23.005

But I would say that if you think something has happened

742

00:36:23.065 --> 00:36:25.005

and you think it can happen again, let us know.

743

00:36:25.025 --> 00:36:26.885

That's kind of the bottom line is to,

744

00:36:27.225 --> 00:36:30.405

to make us a more prepared, uh, more informed

745

00:36:30.995 --> 00:36:32.725

crew member who's going

746

00:36:32.945 --> 00:36:35.485

to be involved in the safety of that operation.

747

00:36:35.585 --> 00:36:39.245

So that's the intent. Yeah. Chris?

748

00:36:39.355 --> 00:36:41.445

Yeah. Uh, good presentation. Thank you.

749

00:36:42.025 --> 00:36:46.685

Um, one thing I kind of a dream world, uh, request here,

750

00:36:46.745 --> 00:36:48.365

but if the first paragraph

751

00:36:48.365 --> 00:36:52.365

of 40 40 26 says this, compliance

752

00:36:52.365 --> 00:36:55.605

with this document is an alternate means of compliance

753

00:36:55.605 --> 00:36:57.805

with part five SMS requirements

754

00:36:57.805 --> 00:36:59.245

for flight test organizations.

755

00:37:00.185 --> 00:37:02.165

If you don't ask for it, you don't get it, that

756

00:37:02.195 --> 00:37:03.325

that would be a request.

757

00:37:03.325 --> 00:37:07.645

Because there, there, it putting in a sms in a corporate,

758

00:37:07.795 --> 00:37:11.405

there's a lot of different organizations that have pieces

759

00:37:11.545 --> 00:37:14.685

of SMS approvals, uh, the CMS for example,

760

00:37:14.905 --> 00:37:16.045

for the whole organization.

761

00:37:16.545 --> 00:37:21.325

Uh, if that's not possible, then I would, uh, request

762

00:37:21.325 --> 00:37:25.885

that you consider mapping 40 40 26 to part five.

763

00:37:26.665 --> 00:37:29.325

It says this paragraph meets the requirements

764

00:37:29.325 --> 00:37:31.165

of 5.71 or whatever.

765

00:37:31.835 --> 00:37:33.325

That would be my, my second choice.

766

00:37:33.345 --> 00:37:36.565

But I think making an an an AMOC would be the, the,

767

00:37:36.585 --> 00:37:37.725

the ideal solution.

768

00:37:38.525 --> 00:37:39.685

I, it's a, a big ask.

769

00:37:40.115 --> 00:37:43.365

Yeah. And it would need more to be an amoc that the,

770
00:37:43.425 --> 00:37:47.485
the other three, um, pillars of, uh,

771
00:37:47.485 --> 00:37:50.885
of an SMS are, are kind of addressed in

772
00:37:50.885 --> 00:37:52.165
that new SMS chapter three.

773
00:37:52.185 --> 00:37:55.405
But there's nothing, there's no regulatory like, hook

774
00:37:55.425 --> 00:37:57.405
or anything that, that does that. But

775
00:37:57.795 --> 00:37:58.845
Yeah, there's, there's six you

776
00:37:58.845 --> 00:37:59.845
Could evolve to that. There's

777
00:37:59.845 --> 00:38:01.885
six parts of the, um, part five,

778
00:38:01.885 --> 00:38:04.005
there's six sub parts of part five.

779
00:38:04.505 --> 00:38:07.605
And the way we're doing it at Cirrus right now is we're

780
00:38:07.605 --> 00:38:10.685
taking the safety risk management part, subpart three

781
00:38:11.065 --> 00:38:14.765
and safety Assurance, and integrating that into flight test.

782
00:38:15.105 --> 00:38:16.805
And everything else is at the corporate level,

783
00:38:16.805 --> 00:38:18.125

safety policy, et cetera.

784

00:38:18.125 --> 00:38:20.605

Mm-hmm. Record. But those two parts were

785

00:38:21.605 --> 00:38:26.205

specifically identifying using 40 40 26 to comply with it.

786

00:38:26.265 --> 00:38:29.205

For those two parts, it maybe just go, this will meet the,

787

00:38:29.425 --> 00:38:30.485

uh, SRM

788

00:38:30.485 --> 00:38:33.245

and S safety assurance parts of part five,

789

00:38:33.755 --> 00:38:36.805

that would be a dramatic reduction in the complexity

790

00:38:37.225 --> 00:38:40.045

of oversight and give great clarity

791

00:38:40.065 --> 00:38:41.445

and focus to what really needs

792

00:38:41.445 --> 00:38:43.005

to be focused on in the flight test.

793

00:38:43.245 --> 00:38:44.245

SMS

794

00:38:44.905 --> 00:38:45.905

Thanks.

795

00:38:47.905 --> 00:38:50.605

Hey Edison. Uh, one question on the, the

796

00:38:51.565 --> 00:38:53.845

signature authority on the, on the TIA form

797

00:38:53.865 --> 00:38:55.165
for the, uh, RM approval.

798

00:38:55.415 --> 00:38:58.245
You'd mentioned Otis can sign them when they're ODA manual.

799

00:38:58.305 --> 00:39:01.125
Has it, is that equally applicable if there's gonna be FA,

800

00:39:01.165 --> 00:39:03.525
a crew members on board, or if it's an FA witness

801

00:39:03.625 --> 00:39:05.445
or an FAA participated test?

802

00:39:05.915 --> 00:39:08.245
Does the FAA flight test branch manager still have

803

00:39:08.245 --> 00:39:12.205
to ultimately be the risk acceptor when your, uh, uh,

804

00:39:12.315 --> 00:39:15.125
your people are on the aircraft as well? We

805

00:39:15.125 --> 00:39:17.125
Have, we have an alternate means

806

00:39:17.225 --> 00:39:18.925
of accepting the risk for our people.

807

00:39:18.985 --> 00:39:22.245
We have our, our flight authorization is our, our vehicle

808

00:39:22.425 --> 00:39:26.165
for actually accepting for a manager accepting the risk of

809

00:39:26.165 --> 00:39:27.765
that person getting on that aircraft.

810

00:39:28.665 --> 00:39:32.605

So if you, if an ODA signs the risk acceptance block,

811

00:39:33.875 --> 00:39:36.685
then we would, uh, talk about

812

00:39:36.685 --> 00:39:37.965
that in our flight authorization

813

00:39:38.225 --> 00:39:40.325
and make sure that that risk is being accepted there.

814

00:39:41.105 --> 00:39:42.805
So yes, there's a way to do that. Okay.

815

00:39:43.075 --> 00:39:45.045
It's in that flow chart. Yes.

816

00:39:45.075 --> 00:39:47.445
It's in the flow chart that I should showed for a second.

817

00:39:54.105 --> 00:39:55.525
Uh, question from ignorance.

818

00:39:56.025 --> 00:39:59.405
How does this apply to unmanned remotely piloted vehicles

819

00:39:59.405 --> 00:40:00.445
or autonomous vehicles?

820

00:40:02.145 --> 00:40:06.405
Um, if you're not

821

00:40:06.815 --> 00:40:11.605
under part, I'm, I'm, uh,

822

00:40:11.945 --> 00:40:16.005
I'm interpreting part five from not as an expert level.

823

00:40:16.665 --> 00:40:18.765
So anybody in the room, correct me if I'm wrong,

824

00:40:18.985 --> 00:40:20.125
but if you're not gonna be,

825

00:40:20.785 --> 00:40:23.565
if you're not gonna have a production C certificate

826

00:40:23.565 --> 00:40:25.485
and a type certificate under part 21,

827

00:40:25.665 --> 00:40:26.845
it doesn't apply to you.

828

00:40:30.635 --> 00:40:32.605
Anybody understand that differently?

829

00:40:34.635 --> 00:40:36.525
Okay. Yeah.

830

00:40:37.785 --> 00:40:39.365
Thanks for the update. Sure.

831

00:40:39.385 --> 00:40:40.965
Always welcome, uh, to hear the latest.

832

00:40:41.705 --> 00:40:44.965
Hey, um, on the acceptance of the rm, uh, bullet three,

833

00:40:44.985 --> 00:40:46.685
it talked about, uh, there was a requirement

834

00:40:46.685 --> 00:40:48.445
to have the history of TIA,

835

00:40:49.265 --> 00:40:50.265
Uh, Yeah. Engagement with

836

00:40:50.265 --> 00:40:51.725
RM before we can get the

837

00:40:51.775 --> 00:40:53.605

acceptance. So is there a,

838

00:40:53.805 --> 00:40:57.045

A way to, so we'd wanna, we'd wanna see you run

839

00:40:57.045 --> 00:40:58.285

through the whole process,

840

00:40:58.425 --> 00:41:01.605

the whole risk management process, a, a, a number of times

841

00:41:01.865 --> 00:41:05.285

before we would accept your RM process.

842

00:41:05.505 --> 00:41:08.085

We can't just out of the gate, you know,

843

00:41:08.855 --> 00:41:11.285

blind not having seen you do it at all.

844

00:41:12.465 --> 00:41:13.965

That's, we don't really have a basis

845

00:41:14.065 --> 00:41:15.725

for accepting your process at that point.

846

00:41:16.065 --> 00:41:17.005

So we'll work with you and then

847

00:41:17.005 --> 00:41:17.845

we'll work on getting accepted.

848

00:41:17.895 --> 00:41:18.895

Right. Got it.

849

00:41:23.025 --> 00:41:26.125

All right. I think I'm, uh, being ushered off here.

850

00:41:26.785 --> 00:41:30.165

Thanks everybody. And, uh, watch out for those snowblowers.

851

00:41:39.665 --> 00:41:42.005

All right. We'll just, uh, give a chance for the, just

852

00:41:42.005 --> 00:41:43.725

to get, kind of get bathroom break, fill up your drinks.

853

00:41:43.775 --> 00:41:47.165

Let's start at right at 1240. Okay. So 1240, we'll still.