1
00:00:00.335 --> 00:00:03.715
Our next, uh, presentation is an update on, uh,

2
00:00:05.145 --> 00:00:07.595
what will become revision D

3
00:00:07.855 --> 00:00:10.915
of FAA order 40 40.26.

4
00:00:11.885 --> 00:00:16.085
That's the, uh, flight test risk management order that, uh,

5
00:00:16.425 --> 00:00:19.285
we all have to follow whenever we do certification testing.

6
00:00:19.705 --> 00:00:24.545
So, Addison Tower has, uh, he spent 24 years

7
00:00:25.635 --> 00:00:27.695
in the Air Force as a bomber test pilot,

8
00:00:28.625 --> 00:00:31.205
and he's been with the FAA for nine years now.

9
00:00:31.995 --> 00:00:34.375
He was the primary pilot on the

10
00:00:35.035 --> 00:00:37.415
SF 50 Vision Jet Certification project.

11
00:00:38.035 --> 00:00:41.255
He also worked through the, uh, certification

12
00:00:41.255 --> 00:00:43.095
of the Garmin Safe return on that jet.

13
00:00:44.245 --> 00:00:48.345
He was, uh, also a member of the 7 3 7 max return

14

00:00:48.345 --> 00:00:50.185
to service technical advisory board.

15
00:00:50.285 --> 00:00:54.155
So would've spent a lot of, lot of hours on that.

16
00:00:54.855 --> 00:00:57.955
And, uh, he's also, since 2021,

17
00:00:58.055 --> 00:01:01.595
has been a flight test safety officer for the FAA.

18
00:01:01.695 --> 00:01:02.775
So, um,

19
00:01:03.905 --> 00:01:07.415
and maybe unsurprisingly, uh,

20
00:01:08.505 --> 00:01:11.355
he's a very proficient juggler, which is probably something

21
00:01:11.355 --> 00:01:15.215
that pretty much every FAA flight test engineer

22
00:01:15.215 --> 00:01:16.695
and pilot should have as a skill.

23
00:01:16.875 --> 00:01:18.295
So, come on up, Addison.

24
00:01:28.275 --> 00:01:31.535
Thanks. Good morning. Uh, anybody have two more of these?

25
00:01:38.765 --> 00:01:41.535
Yeah, I'm the, uh, air Force, uh, air Force, the air,

26
00:01:41.535 --> 00:01:44.095
the FAA, uh, flight test program, flight safety officer.

27
00:01:44.595 --> 00:01:46.935
Uh, and that means that I, um, try

28
00:01:46.935 --> 00:01:50.915
to keep our 70 flight testers safe when they're out flying,

29
00:01:51.175 --> 00:01:54.195
uh, experimental aircraft from hot air balloons

30
00:01:54.195 --> 00:01:56.985
to seven eight sevens, uh, around the world.

31
00:01:57.405 --> 00:02:01.225
Um, and, uh, so that,

32
00:02:01.245 --> 00:02:02.585
uh, keeps me busy.

33
00:02:03.495 --> 00:02:08.465
Um, I will mention that my pronouns are, he, him,

34
00:02:08.965 --> 00:02:12.425
and I say that because when you saw my name on the agenda,

35
00:02:13.385 --> 00:02:15.125
you might have been wondering, uh,

36
00:02:15.195 --> 00:02:16.685
what you would learn about, uh,

37
00:02:16.845 --> 00:02:19.845
FA order 40, 40 26 from a 14-year-old girl.

38
00:02:21.055 --> 00:02:24.525
Uh, until a certain point,

39
00:02:24.555 --> 00:02:28.285
Addison was a perfectly serviceable name for males.

40
00:02:28.885 --> 00:02:30.245
I don't want to get off on a rant here,

41

00:02:30.305 --> 00:02:35.195
but there was a, right

42
00:02:35.195 --> 00:02:39.125
around 2007, this show came out.

43
00:02:40.485 --> 00:02:44.555
Anybody know what the name of the primary character was?

44
00:02:45.925 --> 00:02:48.615
Addison Montgomery, standing right there in the middle.

45
00:02:49.685 --> 00:02:51.865
And, uh, here's my data slide.

46
00:02:52.615 --> 00:02:55.675
So this is the popularity of the female name Addison,

47
00:02:57.205 --> 00:02:58.485
starting in 2004.

48
00:02:58.795 --> 00:03:01.925
This is the rank. So it was the hundred 60th most popular

49
00:03:02.075 --> 00:03:03.885
name for girls in 2004.

50
00:03:04.575 --> 00:03:06.185
Private practice comes out.

51
00:03:06.845 --> 00:03:09.625
And from 2007 to the whole run of that show,

52
00:03:10.655 --> 00:03:13.915
it was the top 20 girls name in the United States,

53
00:03:14.575 --> 00:03:16.795
and it hasn't left the top 50 since then.

54
00:03:18.055 --> 00:03:20.515
So I say my pronouns are he, him, so

55
00:03:20.515 --> 00:03:22.835
that I don't get an email from you sometime in the

56
00:03:22.835 --> 00:03:24.275
future addressed to Ms.

57
00:03:24.325 --> 00:03:27.365
Tower, which I see a lot.

58
00:03:30.195 --> 00:03:31.495
Uh, okay. Rant over.

59
00:03:35.215 --> 00:03:39.515
Um, I'll talk to you about, um, the basis what 40 40 26 is,

60
00:03:39.775 --> 00:03:41.275
in case you're not familiar with it.

61
00:03:41.735 --> 00:03:44.675
Uh, I'll talk about the current state, the revision C

62
00:03:45.215 --> 00:03:48.675
and then I'll talk about, um, what we're doing with the, uh,

63
00:03:48.695 --> 00:03:50.515
the next revision, uh,

64
00:03:50.695 --> 00:03:52.635
and address some specific areas there.

65
00:03:55.055 --> 00:03:59.145
Uh, 40 40 26 is, um, the, the,

66
00:03:59.565 --> 00:04:02.385
the pithy title, aircraft Certification Service Flight Test

67
00:04:02.385 --> 00:04:05.525
Risk Management, uh, first published in the late nineties,

68

00:04:05.745 --> 00:04:07.205
and it was published as a result

69
00:04:07.205 --> 00:04:10.365
of the last fatal accident involving an FAA flight tester,

70
00:04:10.895 --> 00:04:12.515
uh, which was in 1996.

71
00:04:12.535 --> 00:04:16.435
We lost FTE Darryl Schuster during, uh, TIA testing

72
00:04:16.455 --> 00:04:19.355
of a Piper PA 25, uh, Pawnee.

73
00:04:20.845 --> 00:04:25.735
Uh, after that happened, uh, the folks in the FAA worked

74
00:04:25.875 --> 00:04:29.295
and some of the folks are in this room, uh, to come up

75
00:04:29.295 --> 00:04:32.455
with some, uh, guidance on how to, how

76
00:04:32.455 --> 00:04:34.535
to do risk management in a formal way.

77
00:04:35.265 --> 00:04:38.395
Um, uh, we've had that ever since.

78
00:04:39.695 --> 00:04:41.835
Uh, this is straight from the, the regulation.

79
00:04:41.895 --> 00:04:44.035
The audience, uh, of the regulation,

80
00:04:44.095 --> 00:04:46.395
or the order, sorry, is that it, uh, applies

81
00:04:46.455 --> 00:04:49.375
to all individuals involved in, uh,

82
00:04:49.695 --> 00:04:51.855
aircraft FAA aircraft certification,

83
00:04:52.315 --> 00:04:54.495
flight test activities, and their managers.

84
00:04:55.085 --> 00:04:57.225
And the term flight test includes certification,

85
00:04:57.225 --> 00:05:01.225
ground test, uh, and FAA research activities.

86
00:05:02.795 --> 00:05:06.985
Uh, it also applies to certification project applicants.

87
00:05:07.285 --> 00:05:09.585
So most of you in this room, many of you in this room,

88
00:05:10.325 --> 00:05:13.475
other FA lines of business involved in flight test, uh,

89
00:05:13.475 --> 00:05:16.075
designating in designated engineering representatives

90
00:05:16.075 --> 00:05:18.225
and ODAs in their conduct

91
00:05:18.225 --> 00:05:20.705
of FAA certification flight test activities.

92
00:05:24.615 --> 00:05:28.795
Um, so revision C was published not long ago, uh, October

93
00:05:28.855 --> 00:05:33.675
of 2021, uh, that, uh, was published as a result

94
00:05:33.815 --> 00:05:35.235
of, uh, the, uh,

95

00:05:35.715 --> 00:05:39.075
aircraft certification reorganization in, uh, 2017.

96
00:05:39.855 --> 00:05:43.655
Uh, a lot of the, the language referred to organizations

97
00:05:43.655 --> 00:05:45.655
that didn't, uh, exist anymore.

98
00:05:46.905 --> 00:05:47.965
Uh, we had a, uh,

99
00:05:47.965 --> 00:05:51.365
an internal team look at our safety review board process,

100
00:05:51.945 --> 00:05:53.845
and, uh, they came up with some recommendations

101
00:05:54.025 --> 00:05:55.685
for some changes to that language.

102
00:05:56.565 --> 00:05:59.525
Um, as has already been mentioned, the Gulfstream accident,

103
00:05:59.705 --> 00:06:04.555
uh, in 2011, generated some NTSB safety recommendations, uh,

104
00:06:04.935 --> 00:06:07.435
one or more for the Flight Test safety committee.

105
00:06:07.735 --> 00:06:12.475
And then, uh, I think a couple to the FAA, um,

106
00:06:12.775 --> 00:06:14.355
as has already been mentioned, that we should work

107
00:06:14.355 --> 00:06:15.715
with the Flight Test Safety Committee

108
00:06:15.715 --> 00:06:19.565
to provide guidance on, uh, flight test,

109
00:06:20.415 --> 00:06:22.025
SMS, uh,

110
00:06:22.245 --> 00:06:24.705
and then some other low hanging fruit, happy to glads,

111
00:06:24.705 --> 00:06:26.465
grammar, corrections, things like that.

112
00:06:27.315 --> 00:06:29.815
Uh, we wanted to get that out relatively quickly

113
00:06:30.715 --> 00:06:32.215
and then turn around

114
00:06:32.715 --> 00:06:34.775
and do, uh, a big revision,

115
00:06:34.775 --> 00:06:36.175
which I'll talk about in a little bit.

116
00:06:37.355 --> 00:06:40.015
So here's the team. Several of them are in the room today.

117
00:06:40.315 --> 00:06:42.015
Uh, you've probably worked with several of them.

118
00:06:42.795 --> 00:06:43.815
And then the team

119
00:06:43.815 --> 00:06:47.015
that is doing the de revision is the top five on

120
00:06:47.015 --> 00:06:48.095
that list, plus me.

121
00:06:52.375 --> 00:06:54.835
Here's what the, the order looks like right now.

122

00:06:55.335 --> 00:06:59.285
Um, the first five paragraphs are basically motherhood

123
00:06:59.285 --> 00:07:01.465
stuff, purpose, audience cancellation,

124
00:07:01.655 --> 00:07:02.665
explanation of changes.

125
00:07:03.865 --> 00:07:08.725
Um, and then, uh, paragraph six is organization structure,

126
00:07:08.725 --> 00:07:09.725
roles and responsibilities.

127
00:07:10.325 --> 00:07:12.775
Paragraph seven talks about risk management,

128
00:07:12.775 --> 00:07:14.415
and you have to get all the way to paragraph seven

129
00:07:14.435 --> 00:07:16.975
to talk about the subject of the, the order.

130
00:07:18.325 --> 00:07:22.205
Um, and as you'll see, there's also an appendix,

131
00:07:22.205 --> 00:07:24.485
which is even bigger and talks about risk management.

132
00:07:24.625 --> 00:07:26.525
Um, so we're gonna work on

133
00:07:26.525 --> 00:07:27.885
that a little bit in the Debra Vision.

134
00:07:28.525 --> 00:07:31.265
Uh, it also talks about some non-risk management,

135
00:07:31.265 --> 00:07:33.425
things like safety event reporting,

136
00:07:33.715 --> 00:07:35.325
which is safety assurance, right?

137
00:07:36.165 --> 00:07:38.265
And an accident response plan, which

138
00:07:38.975 --> 00:07:40.385
I've had many debates on where

139
00:07:40.385 --> 00:07:42.145
that falls under the four pillars

140
00:07:42.145 --> 00:07:44.225
of safety management system.

141
00:07:44.565 --> 00:07:46.815
Um, but,

142
00:07:46.995 --> 00:07:50.035
uh, talks about that.

143
00:07:50.095 --> 00:07:53.355
And then, uh, FA personnel participate in flight testing.

144
00:07:53.825 --> 00:07:55.795
Then we have 10 appendices.

145
00:07:56.835 --> 00:07:58.775
Uh, the flight test briefing guide may

146
00:07:58.775 --> 00:07:59.815
be familiar to some of you.

147
00:07:59.875 --> 00:08:03.335
It is, uh, um, a pretty decent, uh,

148
00:08:03.355 --> 00:08:05.935
flight test briefing guide and debriefing guide, by the way.

149

00:08:06.515 --> 00:08:07.815
Um, so don't forget that part.

150
00:08:09.135 --> 00:08:12.115
Um, appendix C is the risk management process,

151
00:08:12.375 --> 00:08:14.675
and that's sort of the meat of the whole document,

152
00:08:14.975 --> 00:08:17.265
and yet it's tucked away in an appendix.

153
00:08:17.605 --> 00:08:22.565
Um, appendix D is your example, TA.

154
00:08:23.065 --> 00:08:25.285
So again, you're probably familiar with that part of it.

155
00:08:26.015 --> 00:08:29.355
Um, that's, that's, uh, a place, a, a, um, a place

156
00:08:29.355 --> 00:08:32.035
of departure for an individual company to come up with

157
00:08:32.035 --> 00:08:35.595
how they want their test hazard analysis form to look.

158
00:08:36.515 --> 00:08:38.855
Um, example, letter of authorization.

159
00:08:39.915 --> 00:08:43.495
Um, appendix G is probably of interest to many of you.

160
00:08:43.605 --> 00:08:44.615
It's, uh, examples

161
00:08:44.675 --> 00:08:46.655
of flight tests at various LI risk levels.

162
00:08:46.805 --> 00:08:49.135
This kind of gives you a, again, a starting off point.

163
00:08:50.335 --> 00:08:51.675
I'm gonna go do this kind of testing.

164
00:08:51.785 --> 00:08:53.275
What does the FAA think the risk

165
00:08:53.275 --> 00:08:54.475
level is for that kind of testing.

166
00:08:56.725 --> 00:08:59.465
And it's not always set in stone, you know, it's a point

167
00:08:59.465 --> 00:09:01.225
of departure for, for, for discussion.

168
00:09:01.995 --> 00:09:05.015
Um, and then, uh, pre-flight cert board,

169
00:09:05.315 --> 00:09:06.775
and, uh, some other stuff.

170
00:09:07.595 --> 00:09:09.415
So, that's how the document stands today.

171
00:09:10.585 --> 00:09:13.845
And, uh, like I said, the whole, the plan all along was

172
00:09:13.845 --> 00:09:16.285
to get the sea revision out quickly so

173
00:09:16.285 --> 00:09:18.445
that it would address some of that reorg stuff.

174
00:09:19.175 --> 00:09:21.715
And then we recognized that there was a need to

175
00:09:22.635 --> 00:09:24.445
look at the whole document as a whole,

176

00:09:25.345 --> 00:09:28.535
and, um, maybe restructure it

177
00:09:28.675 --> 00:09:30.495
and, uh, make sure it reflects the latest

178
00:09:30.495 --> 00:09:31.655
thinking and best practices.

179
00:09:31.655 --> 00:09:35.415
We know there's a lot of, um, tools

180
00:09:35.755 --> 00:09:38.215
and, uh, new things happening in risk management.

181
00:09:38.705 --> 00:09:40.085
So we wanna make sure the document

182
00:09:40.095 --> 00:09:41.205
stays up to date with that.

183
00:09:42.095 --> 00:09:43.795
And answers frequently asked questions,

184
00:09:43.815 --> 00:09:47.345
and it's organized to, uh, be easy to use.

185
00:09:49.405 --> 00:09:52.405
Um, what we're focusing on, uh, first,

186
00:09:52.545 --> 00:09:54.325
as I've already alluded to, we're gonna move the risk

187
00:09:54.325 --> 00:09:56.085
management guidance to the body of the document.

188
00:09:56.915 --> 00:09:59.855
Uh, we're gonna harmonize it with our SMS.

189
00:09:59.975 --> 00:10:04.175
I do manage a part five SMS, um, for the FA flight test.

190
00:10:06.065 --> 00:10:09.445
Um, and that turned out to be, uh, pretty,

191
00:10:09.505 --> 00:10:10.925
pretty simple actually.

192
00:10:11.065 --> 00:10:14.675
Um, we risk management is, you know, the, i,

193
00:10:14.835 --> 00:10:17.035
I argue the most important pillar of an SMS,

194
00:10:17.575 --> 00:10:18.835
and we've been doing it for decades,

195
00:10:19.295 --> 00:10:20.715
and we were pretty good at it.

196
00:10:20.855 --> 00:10:23.875
So, um, there wasn't a whole lot of work to do

197
00:10:23.875 --> 00:10:25.915
to harmonize it with, with an SMS.

198
00:10:26.255 --> 00:10:28.305
Um, the last three I'll,

199
00:10:28.305 --> 00:10:30.145
I'll we'll look at in more detail here.

200
00:10:30.145 --> 00:10:31.945
We're gonna address the safety report, sharing

201
00:10:32.465 --> 00:10:35.825
with applicants, um, the clarification

202
00:10:35.825 --> 00:10:37.465
of the fa a accepted risk management process

203

00:10:37.925 --> 00:10:39.625
and guidance for a flight test.

204
00:10:39.865 --> 00:10:44.845
SMS. So

205
00:10:44.845 --> 00:10:45.925
sharing of safety reports.

206
00:10:46.065 --> 00:10:49.445
The c revision added this language that said,

207
00:10:49.765 --> 00:10:51.925
a applicant will, and we'll see it here in a minute,

208
00:10:52.025 --> 00:10:55.455
but it basically says Applicant should share safety reports

209
00:10:55.455 --> 00:10:56.815
with us, and we should share ours with them.

210
00:10:57.155 --> 00:10:58.335
But it didn't say how to do that.

211
00:10:58.395 --> 00:11:00.695
It didn't say, you know, it didn't,

212
00:11:01.195 --> 00:11:03.135
and I think it says, should we'll see in a minute.

213
00:11:04.145 --> 00:11:07.535
Um, I thought this, this language was interesting.

214
00:11:07.605 --> 00:11:10.575
This was brand new as of last Friday in the final rule

215
00:11:11.195 --> 00:11:15.445
of the new part five, um, language, which

216
00:11:16.185 --> 00:11:18.545
now mandates that design and

217
00:11:18.605 --> 00:11:22.815
and manufacturing, uh, organizations who have a TC

218
00:11:22.815 --> 00:11:24.535
and a PC have to have an SMS

219
00:11:25.295 --> 00:11:27.835
and part 1 35 operators have to have an SMS.

220
00:11:27.835 --> 00:11:31.035
It adds this paragraph about notification of hazards

221
00:11:31.035 --> 00:11:32.395
to interfacing persons.

222
00:11:33.605 --> 00:11:36.905
It says, if a person required to have an SMS under this part

223
00:11:37.585 --> 00:11:39.625
identifies a hazard in the operating environment,

224
00:11:40.725 --> 00:11:43.265
the person must provide notice of the hazard

225
00:11:43.405 --> 00:11:47.195
to any interfacing person that, to the best

226
00:11:47.195 --> 00:11:49.355
of the person's knowledge, could address the hazard

227
00:11:49.535 --> 00:11:53.485
or mitigate the risk for the purpose of this section.

228
00:11:53.485 --> 00:11:56.565
Interfacing persons are those that contribute to the safety

229
00:11:56.585 --> 00:11:58.845
of the certificate or letter of authorization holders,

230

00:11:59.205 --> 00:12:00.485
aviation related products and services.

231
00:12:01.775 --> 00:12:05.485
So that's not clear to me what that means.

232
00:12:05.825 --> 00:12:08.005
And I'm sure there's going to be a lot

233
00:12:08.005 --> 00:12:09.045
of discussion about this.

234
00:12:10.285 --> 00:12:14.255
Does this mean that if you are a part 23

235
00:12:15.215 --> 00:12:19.685
aircraft manufacturer and you identify a hazard associated

236
00:12:19.715 --> 00:12:24.585
with a, a manufacturing a part 23 aircraft, does

237
00:12:24.585 --> 00:12:28.095
that mean you have to share that hazard

238
00:12:28.165 --> 00:12:30.975
with every other part 23 aircraft manufacturer who's

239
00:12:30.975 --> 00:12:32.015
exposed to that same hazard?

240
00:12:32.855 --> 00:12:35.865
I don't know. Um, and how would we do that?

241
00:12:37.145 --> 00:12:41.805
So, um, I'm, I'm gonna talk some more about this as we go

242
00:12:41.805 --> 00:12:43.805
through here, but just know that this language is here.

243
00:12:44.305 --> 00:12:48.765
And I think that, um, if we're going to mandate this,

244
00:12:48.895 --> 00:12:51.125
we're also going to have to provide a way to do this

245
00:12:51.945 --> 00:12:53.835
that addresses some of the concerns which we're gonna get.

246
00:12:55.545 --> 00:12:58.445
Uh, there is a tension between sharing of safety information

247
00:12:58.665 --> 00:13:01.525
and compromise of proprietary intellectual property.

248
00:13:01.945 --> 00:13:06.755
You all run a business, you all compete for profits.

249
00:13:07.325 --> 00:13:10.465
You all, uh, think of new things and innovate things,

250
00:13:10.805 --> 00:13:13.825
and, uh, you want to be able to save that

251
00:13:13.825 --> 00:13:15.665
for yourselves and rightly so.

252
00:13:16.555 --> 00:13:21.265
Um, on the other hand, when you, when you identify a hazard

253
00:13:21.335 --> 00:13:23.345
that could kill someone else in another company,

254
00:13:24.455 --> 00:13:26.635
is it our responsibility to share that information?

255
00:13:27.695 --> 00:13:29.915
Say we don't compete on safety, right? I hear that a lot.

256
00:13:31.905 --> 00:13:33.645
The more that people are aware of hazards, risk

257

```
00:13:33.645 --> 00:13:35.525
and risk controls, the safer we'll be, right.

258
00:13:35.665 --> 00:13:38.725
The S-S-E-T-P and SFTE were founded on that idea.

259
00:13:38.955 --> 00:13:40.925
It's a place to share lessons in a safe

260
00:13:40.925 --> 00:13:42.835
space where we can do that.

261
00:13:43.435 --> 00:13:47.845
However, we're, uh, I, as I travel around

262
00:13:47.865 --> 00:13:50.485
and meet with applicant safety, uh, managers

263
00:13:51.715 --> 00:13:54.085
hear a lot about, uh, the workload required

264
00:13:54.105 --> 00:13:56.125
for commercial flight testers to get a lessons learned,

265
00:13:56.125 --> 00:13:57.125
presentation vetted

266
00:13:57.125 --> 00:13:58.925
through legal media relations, et cetera.

267
00:13:58.925 --> 00:14:02.525
We've seen that at this event, um, already, that a few,

268
00:14:02.625 --> 00:14:04.685
few presentations didn't make it because of this process.

269
00:14:05.575 --> 00:14:09.235
And that's just one presentation, one lesson, if you will,

270
00:14:10.095 --> 00:14:12.085
takes that much work to, to share it.
```

271
00:14:13.225 --> 00:14:17.845
I know that you all have safety reporting systems with lots

272
00:14:17.845 --> 00:14:19.125
of lessons in them,

273
00:14:20.125 --> 00:14:23.505
and, uh, I've heard from, from some of you

274
00:14:23.505 --> 00:14:25.785
that you have libraries of hundreds of tpha

275
00:14:25.815 --> 00:14:28.675
that could be uploaded to the NASA flight

276
00:14:28.675 --> 00:14:30.075
to safety database if it worked.

277
00:14:30.705 --> 00:14:34.565
Um, but you just don't have time to sanitize all

278
00:14:34.565 --> 00:14:38.885
that information and prepare it to be shared in,

279
00:14:38.945 --> 00:14:40.045
uh, a place like that.

280
00:14:41.205 --> 00:14:43.265
Um, so all those lessons are out there

281
00:14:44.055 --> 00:14:45.675
in separate little boxes.

282
00:14:46.255 --> 00:14:51.045
And, um, we're hoping that someday we can find a,

283
00:14:51.045 --> 00:14:53.045
a way to get all those lessons into one box

284

00:14:53.045 --> 00:14:55.115
that we can all look in.

285
00:14:56.425 --> 00:14:58.695
Um, not sure how that's gonna happen yet,

286
00:15:00.535 --> 00:15:03.995
but that language I just showed in part five, um,

287
00:15:04.135 --> 00:15:05.795
is gonna move us in that direction, I think.

288
00:15:07.815 --> 00:15:09.995
Uh, so I've, I've got the old language,

289
00:15:09.995 --> 00:15:11.995
or the current language, I should say on the left,

290
00:15:12.095 --> 00:15:15.235
and then our draft d revision language on the right.

291
00:15:16.255 --> 00:15:17.435
Um, so the, uh,

292
00:15:18.145 --> 00:15:21.445
the old language says applicants DR ODAs

293
00:15:21.445 --> 00:15:23.365
and applicants with an FA accepted risk management process

294
00:15:23.505 --> 00:15:24.765
are strongly encouraged

295
00:15:24.765 --> 00:15:27.865
to submit safety reports in accordance with this order.

296
00:15:29.315 --> 00:15:31.135
And the new language adds, uh,

297
00:15:31.335 --> 00:15:33.175
a little cheerleading statement.

298
00:15:33.335 --> 00:15:35.775
A strong, uh, reporting culture is essential

299
00:15:35.775 --> 00:15:37.495
to effective safety assurance.

300
00:15:38.305 --> 00:15:41.285
And then sort of the same language, uh, strongly encouraged

301
00:15:41.285 --> 00:15:44.255
to report safety, uh, safety reports

302
00:15:44.255 --> 00:15:46.215
to the air flight test section, responsible

303
00:15:46.215 --> 00:15:50.785
for their oversight, uh, DRS

304
00:15:50.785 --> 00:15:53.905
and ODAs may use their report format available from their

305
00:15:53.905 --> 00:15:56.945
section Flight Safety Officers, what that stands for.

306
00:15:58.245 --> 00:15:59.785
And in the new draft, we're going

307
00:15:59.785 --> 00:16:02.705
to include a safety report format that you can use.

308
00:16:02.705 --> 00:16:04.945
You don't have to ask for it from anybody, it's just there.

309
00:16:05.775 --> 00:16:07.595
Um, and you can just submit it to your,

310
00:16:07.865 --> 00:16:10.535
your section Flight safety officer, um,

311

00:16:11.905 --> 00:16:15.045
in the flight test section that does, that you interface

312
00:16:15.045 --> 00:16:16.605
with most, most of the time,

313
00:16:20.855 --> 00:16:22.935
um, the old language

314
00:16:23.115 --> 00:16:25.455
or the current language says, per personal applicant,

315
00:16:25.735 --> 00:16:26.975
identifying information will be removed

316
00:16:26.975 --> 00:16:29.535
to ensure confidentiality of SSE submitters.

317
00:16:30.455 --> 00:16:31.705
Proprietary data cannot

318
00:16:31.805 --> 00:16:35.245
and will not be shared outside the FAA that's designed

319
00:16:35.245 --> 00:16:36.925
to give applicants confidence

320
00:16:36.925 --> 00:16:39.485
that their proprietary information is safe.

321
00:16:39.635 --> 00:16:41.485
When they share safety reports with us.

322
00:16:42.245 --> 00:16:45.485
I'm not sure it's enough. Um, so we added,

323
00:16:47.345 --> 00:16:48.485
uh, in the new language

324
00:16:48.515 --> 00:16:50.565
outside agency reports should be sanitized

325
00:16:50.565 --> 00:16:52.805
or pro, pro proprietary data

326
00:16:53.425 --> 00:16:56.005
and company identifying information prior to submission.

327
00:16:56.065 --> 00:16:58.845
So if possible, don't even give us that information if you,

328
00:16:58.865 --> 00:17:00.925
if the value of the lesson is still there.

329
00:17:02.795 --> 00:17:04.495
On top of that, the FA is required

330
00:17:04.495 --> 00:17:07.455
to protect proprietary data in accordance with Title 18 USC,

331
00:17:07.455 --> 00:17:08.735
section 1 19 0 5.

332
00:17:09.155 --> 00:17:12.715
And proprietary data cannot be shared outside the FAA.

333
00:17:14.005 --> 00:17:15.745
So a little more of a regulatory hook there

334
00:17:15.745 --> 00:17:18.265
that says we we're not allowed to share proprietary data,

335
00:17:19.745 --> 00:17:23.855
um, current language in the

336
00:17:23.975 --> 00:17:25.095
interest of sharing safety data.

337
00:17:25.095 --> 00:17:28.255
The FAA should also share their SSE data.

338

00:17:28.525 --> 00:17:31.335
That safety significant event is what SSE stands for.

339
00:17:32.255 --> 00:17:34.315
Um, that's what we call our safety reports.

340
00:17:34.495 --> 00:17:36.275
We should share our reports with applicants.

341
00:17:36.945 --> 00:17:38.075
Well, that's gonna make you nervous.

342
00:17:38.395 --> 00:17:40.435
'cause now if I fly with, with applicant A

343
00:17:40.695 --> 00:17:42.355
and I, something happens there

344
00:17:42.655 --> 00:17:45.995
and I share that safety event with applicant B,

345
00:17:47.615 --> 00:17:50.345
that's gonna make applicant a nervous, right?

346
00:17:51.495 --> 00:17:53.755
So, uh, I add the language here

347
00:17:54.295 --> 00:17:55.795
in the interest of sharing safety data.

348
00:17:55.815 --> 00:17:57.875
The FAA should also share their SSE data

349
00:17:57.875 --> 00:17:58.915
with the flight test community.

350
00:17:58.975 --> 00:18:01.155
All reports will be coordinated with the applicant

351
00:18:01.155 --> 00:18:03.435
before wider dissemination in the flight test community.

352
00:18:03.985 --> 00:18:05.165
So before I share anything,

353
00:18:05.165 --> 00:18:09.765
before we share anything, we will ask the applicant we flew

354
00:18:09.765 --> 00:18:12.375
with on that event, can we share this

355
00:18:13.235 --> 00:18:14.245
outside of your company?

356
00:18:14.345 --> 00:18:15.965
Can we share this with the flight test community?

357
00:18:16.625 --> 00:18:18.605
And we'll make sure that, that,

358
00:18:18.605 --> 00:18:19.925
that applicant is comfortable with that.

359
00:18:19.925 --> 00:18:20.605
Before we do that,

360
00:18:25.555 --> 00:18:27.655
you'll, by the way, you'll all have have a chance

361
00:18:27.655 --> 00:18:31.865
to comment on this, this language in this document, um,

362
00:18:31.965 --> 00:18:33.305
before it goes to print.

363
00:18:33.485 --> 00:18:35.785
So, um, take, take notes.

364
00:18:38.585 --> 00:18:41.085
How do we do this? I I mentioned this already.

365

00:18:41.225 --> 00:18:42.565
Uh, to make this work, we have

366
00:18:42.565 --> 00:18:43.885
to make manufacturers confident.

367
00:18:43.885 --> 00:18:45.565
Their data will be se uh, secure,

368
00:18:46.105 --> 00:18:47.365
not end up on the front page.

369
00:18:48.245 --> 00:18:50.845
I have to do more fact finding about what's subject to foia.

370
00:18:51.345 --> 00:18:55.585
Of course, that's a concern. I believe that SMS data or not.

371
00:18:55.665 --> 00:18:57.145
I heard an FA executive say

372
00:18:57.145 --> 00:18:58.625
that at a safety conference recently.

373
00:18:59.165 --> 00:19:01.465
Um, but I need to find the citation for that.

374
00:19:01.465 --> 00:19:04.275
That actually says that again, to build,

375
00:19:04.285 --> 00:19:05.355
build that confidence.

376
00:19:07.615 --> 00:19:08.765
Could this be another function

377
00:19:08.765 --> 00:19:11.885
of the NASA flight test safety database or a separate tool?

378
00:19:12.125 --> 00:19:15.325
I was talking with Chris Glaser, the safety manager,

379
00:19:15.505 --> 00:19:18.525
or safety director of safety at Cirrus this morning,

380
00:19:18.585 --> 00:19:21.765
and he suggested maybe NASA ASARs would be a framework

381
00:19:22.645 --> 00:19:23.665
for this information.

382
00:19:23.965 --> 00:19:25.335
Uh, 'cause that's already a place

383
00:19:25.335 --> 00:19:28.015
where safety data gets shared or gets reported.

384
00:19:28.845 --> 00:19:32.485
Um, so that's an interesting idea.

385
00:19:33.095 --> 00:19:35.865
There's gonna be an explosion in the number of SMSs.

386
00:19:36.085 --> 00:19:39.345
So part one 30 fives airports are required to have SMSs.

387
00:19:39.365 --> 00:19:44.345
Now, um, all y'all mostly, um, so,

388
00:19:45.395 --> 00:19:47.535
and they're all subject to that, that language

389
00:19:47.565 --> 00:19:49.855
that I showed on notification of hazards

390
00:19:49.855 --> 00:19:50.975
to interfacing persons.

391
00:19:51.355 --> 00:19:54.385
So I have to see if there's another part

392

00:19:54.385 --> 00:19:55.785
of the fa a already working on this.

393
00:19:56.155 --> 00:19:58.335
You know, they may be already be working on a tool

394
00:19:58.335 --> 00:19:59.935
where this information can be reported

395
00:20:00.035 --> 00:20:04.395
and safely sh accessed, searched and shared.

396
00:20:07.885 --> 00:20:09.905
Uh, so moving into the, uh,

397
00:20:10.265 --> 00:20:13.935
accepted risk management process, uh, this is something

398
00:20:14.125 --> 00:20:16.615
that, uh, we've, that's been around a long time.

399
00:20:16.835 --> 00:20:18.815
You can think of it as a sort of a delegation

400
00:20:19.435 --> 00:20:20.615
of just a little part

401
00:20:20.615 --> 00:20:23.415
of the flight test risk management process that makes things

402
00:20:24.635 --> 00:20:27.155
slightly more efficient for an applicant,

403
00:20:27.605 --> 00:20:29.535
because it allows the FAA

404
00:20:29.535 --> 00:20:31.055
to be a little less involved in the process.

405
00:20:32.525 --> 00:20:37.505
Um, and here's the language in the current, uh, revision.

406
00:20:37.505 --> 00:20:39.385
There's not much it says to be found,

407
00:20:39.725 --> 00:20:42.145
and there's more than this, but this is kind of the meat

408
00:20:42.145 --> 00:20:43.955
of it to be found acceptable

409
00:20:43.955 --> 00:20:45.955
by the Cognizant FAA flight test organization.

410
00:20:45.955 --> 00:20:48.885
The applicant's RM process must comply with the requirements

411
00:20:48.885 --> 00:20:50.535
of this order, okay?

412
00:20:51.735 --> 00:20:54.235
And then the acceptance must be formally documented.

413
00:20:55.005 --> 00:20:57.145
So I want to clarify. Our team wants

414
00:20:57.145 --> 00:21:00.105
to clarify oversight procedures, benefits to the applicant,

415
00:21:00.285 --> 00:21:01.905
app applicability to ODAs,

416
00:21:02.285 --> 00:21:04.025
and, uh, requirements for acceptance.

417
00:21:04.085 --> 00:21:05.265
So we'll look at that.

418
00:21:06.615 --> 00:21:08.195
Here's, uh, a, a, a lot

419

00:21:08.195 --> 00:21:09.635
of draft texts I'll be throwing up here.

420
00:21:10.305 --> 00:21:14.455
Um, uh, applicants who have a history of

421
00:21:14.595 --> 00:21:17.135
and are highly eng engaged, regularly engaged in TIA

422
00:21:17.135 --> 00:21:19.335
activities, uh, should be encouraged

423
00:21:19.335 --> 00:21:21.575
to develop an an FA accepted risk management process.

424
00:21:22.665 --> 00:21:24.445
Uh, the, the order on type certification.

425
00:21:24.585 --> 00:21:28.245
And the TIA form themselves also contain guidance on

426
00:21:28.325 --> 00:21:29.685
FA accepted risk management process.

427
00:21:30.525 --> 00:21:32.785
Uh, but this section will give further description.

428
00:21:33.485 --> 00:21:35.695
Um, this basically says, when,

429
00:21:35.805 --> 00:21:38.455
when we the FAA change this order,

430
00:21:39.195 --> 00:21:40.735
all the accepted risk management

431
00:21:40.735 --> 00:21:41.935
processes should be reviewed.

432
00:21:42.395 --> 00:21:45.295
And when an applicant changes their process, the we,

433
00:21:45.295 --> 00:21:46.655
the FAA should review it.

434
00:21:46.655 --> 00:21:49.985
Again, uh, acceptance

435
00:21:50.045 --> 00:21:53.545
of a process doesn't preclude we the FAA from

436
00:21:55.415 --> 00:21:57.775
determining what level we wanna stay involved on any

437
00:21:57.775 --> 00:21:58.815
particular project, right?

438
00:21:59.465 --> 00:22:03.305
Um, when we delegate things, sometimes we retain parts of it

439
00:22:03.985 --> 00:22:05.135
based on the situation.

440
00:22:05.275 --> 00:22:06.615
So that's what that means.

441
00:22:06.955 --> 00:22:11.045
Um, uh, this says

442
00:22:11.045 --> 00:22:13.645
that Air FAA flight test crew members are expected

443
00:22:13.645 --> 00:22:15.245
to follow an applicant's f fa

444
00:22:15.445 --> 00:22:16.485
accepted risk management process.

445
00:22:17.615 --> 00:22:20.395
Um, and again, the, the disclaimer there, managers

446

00:22:20.395 --> 00:22:22.755
or crew members always have the option to raise an issue

447
00:22:22.755 --> 00:22:25.275
with any flight test profiles, procedures, limitations,

448
00:22:26.085 --> 00:22:28.065
and we always have the no vote, uh,

449
00:22:28.385 --> 00:22:30.785
which we hope all your companies do as well.

450
00:22:32.565 --> 00:22:37.065
And then to restart stuff, uh, you have to, um, go to the,

451
00:22:37.085 --> 00:22:40.825
uh, the level of review required by the guidance in the,

452
00:22:40.825 --> 00:22:42.345
in the order to resume testing

453
00:22:42.415 --> 00:22:43.985
following settlement of the issue.

454
00:22:46.305 --> 00:22:48.675
What is having a risk management process give an applicant?

455
00:22:48.835 --> 00:22:50.275
I kind of already alluded to that.

456
00:22:50.455 --> 00:22:53.115
It allows you to conduct the risk management review, whether

457
00:22:53.115 --> 00:22:56.675
that's a safety review board or whatever you call it, uh,

458
00:22:56.735 --> 00:22:59.835
or a desktop review without direct FA involvement.

459
00:22:59.835 --> 00:23:02.395
And this is good for when we delegate something completely

460
00:23:02.535 --> 00:23:03.595
to, to a company.

461
00:23:04.465 --> 00:23:07.405
Um, and we're not even gonna have an FAA crew member on

462
00:23:07.405 --> 00:23:11.195
board that allows you at the, you know, the end

463
00:23:11.195 --> 00:23:13.185
of the whip cracking when you've,

464
00:23:13.185 --> 00:23:15.225
you've designed the aircraft, you've built the aircraft,

465
00:23:15.225 --> 00:23:16.385
you've done all your company testing,

466
00:23:16.445 --> 00:23:19.305
and now all you need to do to sell it is to get

467
00:23:19.305 --> 00:23:20.505
through the certification process.

468
00:23:21.625 --> 00:23:23.085
So you're at the end of that whip crack

469
00:23:23.085 --> 00:23:25.445
where it's approaching supersonic speed, right?

470
00:23:25.785 --> 00:23:27.445
And you want to get all this stuff done fast.

471
00:23:27.865 --> 00:23:30.525
So if we've delegated everything to you, and now,

472
00:23:30.525 --> 00:23:34.085
and now with this, we've delegated the SRB process to you.

473

00:23:34.805 --> 00:23:37.865
Um, that just allows you to schedule that without having

474
00:23:37.965 --> 00:23:39.185
to get four other people

475
00:23:39.245 --> 00:23:41.105
or 10 other people involved in that process.

476
00:23:43.095 --> 00:23:44.835
Uh, only applies to TIA flying

477
00:23:45.265 --> 00:23:49.305
and, uh, again, the, uh, type certification,

478
00:23:49.305 --> 00:23:52.305
or I'm sorry, the TIA form also has instructions on,

479
00:23:54.365 --> 00:23:58.535
um, this is just a little clarification on what, what that,

480
00:23:58.715 --> 00:24:02.855
um, risk acceptance signature means on the TIA form.

481
00:24:03.515 --> 00:24:06.375
Um, and basically the second bullet there,

482
00:24:06.375 --> 00:24:08.215
it ensures the associated flight test

483
00:24:08.215 --> 00:24:09.455
risks are, are acceptable.

484
00:24:09.555 --> 00:24:12.025
So it means you've done the risk management

485
00:24:12.025 --> 00:24:13.675
process appropriately.

486
00:24:14.625 --> 00:24:16.685
The appropriate level of risk has been assigned,

487
00:24:17.265 --> 00:24:18.725
and it has been, um,

488
00:24:18.985 --> 00:24:21.085
the risk have been mitigated to an acceptable level.

489
00:24:21.085 --> 00:24:22.245
That's what that signature means.

490
00:24:22.625 --> 00:24:24.895
It does not mean you're accepting risk

491
00:24:24.955 --> 00:24:27.455
for a particular person to get on that airplane and,

492
00:24:27.455 --> 00:24:30.345
and fly that flight test in the FAA.

493
00:24:30.345 --> 00:24:31.705
We do that with a separate instrument

494
00:24:31.705 --> 00:24:33.065
called the flight authorization.

495
00:24:34.095 --> 00:24:38.555
Um, so just clarifying that, um, maybe more so for,

496
00:24:38.655 --> 00:24:40.115
for our internal FAA folks.

497
00:24:41.415 --> 00:24:45.005
Um, this is, uh, it talks about the o whether this applies

498
00:24:45.005 --> 00:24:49.085
to an ODA, the ODA order 8,100 point 15

499
00:24:49.845 --> 00:24:52.255
says an ODA holder, um, must,

500

00:24:52.325 --> 00:24:54.855
basically must have an FA accepted risk management process

501
00:24:55.035 --> 00:24:56.855
in order to have the authority to sign

502
00:24:56.855 --> 00:24:58.215
that block on the TIA.

503
00:24:59.055 --> 00:25:00.835
So, um, the, the actual language is there.

504
00:25:00.855 --> 00:25:03.515
An ODA procedures manual Risk management procedures must

505
00:25:03.515 --> 00:25:05.315
meet the requirements of this order.

506
00:25:05.495 --> 00:25:10.355
So, um, if you're an ODA, uh, you

507
00:25:11.415 --> 00:25:13.985
technically have an FA accepted risk management process.

508
00:25:13.985 --> 00:25:16.265
There's still some disagreement on that, uh,

509
00:25:16.525 --> 00:25:18.185
within FAA flight test.

510
00:25:19.025 --> 00:25:21.845
But, uh, if this language gets approved, uh,

511
00:25:21.845 --> 00:25:22.925
that is what that will mean.

512
00:25:25.725 --> 00:25:29.265
Um, and then here's 12 criteria for acceptance

513
00:25:29.265 --> 00:25:30.385
of a risk management process.

514
00:25:30.605 --> 00:25:35.445
And I'm sure this will be, um, perhaps controversial

515
00:25:35.745 --> 00:25:38.325
and we're, we're eager for your feedback on these.

516
00:25:39.105 --> 00:25:40.325
Um, and this may not be

517
00:25:40.325 --> 00:25:42.365
what it looks like when I send it out for feedback

518
00:25:42.565 --> 00:25:44.405
'cause there's still some work being done on this.

519
00:25:44.465 --> 00:25:48.615
But, um, the RRN process has to comply with the order.

520
00:25:48.965 --> 00:25:51.855
That means you have a defined review process, whether

521
00:25:51.855 --> 00:25:53.255
that's an SRB or a desktop

522
00:25:53.255 --> 00:25:54.455
review, or whatever you wanna call it.

523
00:25:55.135 --> 00:25:57.995
Um, you have to define who's gonna sign the risk management

524
00:25:57.995 --> 00:26:00.945
block for low risk, medium risk, high risk,

525
00:26:01.005 --> 00:26:02.265
who signs for each of those levels.

526
00:26:03.045 --> 00:26:06.465
Um, and then that person signs

527

00:26:07.465 --> 00:26:09.825
ensuring the associated flight test risks are acceptable.

528
00:26:10.135 --> 00:26:11.865
Risk management process has been conducted

529
00:26:11.865 --> 00:26:13.025
in accordance with procedures.

530
00:26:13.445 --> 00:26:14.585
And this should be a manager

531
00:26:14.645 --> 00:26:16.545
who oversees flight test operations

532
00:26:16.605 --> 00:26:21.275
or someone in their chain of command, someone

533
00:26:21.275 --> 00:26:22.355
who understands flight tests.

534
00:26:22.355 --> 00:26:25.375
Basically, uh, the FAA should always be able to review

535
00:26:25.375 --> 00:26:27.095
and audit the, the applicant's are in process.

536
00:26:27.165 --> 00:26:30.545
There's that disclaimer that we still be involved if we want

537
00:26:30.545 --> 00:26:32.485
to be, uh, demonstrated.

538
00:26:32.665 --> 00:26:35.965
Uh, company history of TIA flying, this has been flagged as,

539
00:26:36.225 --> 00:26:39.085
as, uh, kind of soft, uh, squishy language

540
00:26:39.235 --> 00:26:41.085
that may need some shoring up.

541
00:26:41.395 --> 00:26:44.445
High quality risk management documentation, high level CRM

542
00:26:44.445 --> 00:26:45.645
and aeronautical decision making,

543
00:26:45.645 --> 00:26:48.585
appropriate risk level management, and high level of trust.

544
00:26:49.495 --> 00:26:51.355
Um, open and productive communication

545
00:26:51.355 --> 00:26:52.715
between the FA and applicant.

546
00:26:53.455 --> 00:26:55.665
Applicant should not be reluctant to share problems

547
00:26:55.665 --> 00:26:59.075
or setbacks with the project, uh,

548
00:26:59.075 --> 00:27:01.355
confidential non-punitive safety reporting process.

549
00:27:01.895 --> 00:27:02.955
We hope you all have these.

550
00:27:03.715 --> 00:27:05.295
Uh, the applicant should be willing to share

551
00:27:05.295 --> 00:27:08.325
with FAA flight test safety reports, uh,

552
00:27:08.385 --> 00:27:09.605
safety reports relevant

553
00:27:09.605 --> 00:27:13.115
to the TIA certification flight tests, uh, designated

554

00:27:13.135 --> 00:27:14.355
and trained flight safety officer

555
00:27:14.355 --> 00:27:16.675
or manager capable of managing the SRB process.

556
00:27:17.635 --> 00:27:19.535
Um, I think that question mark's gonna go away.

557
00:27:20.885 --> 00:27:22.985
Uh, applicant must have risk controls

558
00:27:22.985 --> 00:27:26.025
that address the following hazards, uh, lack of proficiency,

559
00:27:26.465 --> 00:27:29.465
currency, IE you should have a training program, lack

560
00:27:29.465 --> 00:27:31.105
of fitness for duty and fatigue.

561
00:27:31.345 --> 00:27:33.905
IE you should have some crew rest and crew duty day rules

562
00:27:34.745 --> 00:27:36.285
and an emergency response plan.

563
00:27:36.585 --> 00:27:38.445
So normally that would be in some sort

564
00:27:38.445 --> 00:27:39.445
of flight operations manual.

565
00:27:40.195 --> 00:27:41.975
Um, applicant develop briefing guides

566
00:27:41.975 --> 00:27:44.815
that must incorporate in a minimum the appropriate items

567
00:27:44.885 --> 00:27:46.775
from the FAA flight test briefing guide.

568
00:27:47.995 --> 00:27:51.415
And last three, um, periodic review of accidents, incidents,

569
00:27:51.415 --> 00:27:53.055
and safety reports within your company.

570
00:27:53.765 --> 00:27:55.225
Uh, mandatory safety meetings.

571
00:27:55.365 --> 00:27:58.625
And we strongly recommend, uh, a flight test, SMS

572
00:27:58.625 --> 00:28:01.025
and periodic self audits of your risk manage process.

573
00:28:01.365 --> 00:28:06.045
So conceivably, now that I've seen the,

574
00:28:06.105 --> 00:28:08.845
the Flight Test Safety Committee's presentation on their

575
00:28:10.695 --> 00:28:14.795
possible certification of a of an SMS, we may be able

576
00:28:14.795 --> 00:28:16.195
to eliminate all that and say,

577
00:28:16.335 --> 00:28:18.965
flight test safety certification, flight test,

578
00:28:18.965 --> 00:28:21.085
safety committee certification of your SMS will,

579
00:28:21.115 --> 00:28:22.285
will suffice for all of these.

580
00:28:23.135 --> 00:28:24.655
Um, conceivably.

581

00:28:26.435 --> 00:28:29.695
Uh, and then there's a process for submittal and acceptance.

582
00:28:29.795 --> 00:28:31.535
I'm, I'm running short of time here,

583
00:28:31.555 --> 00:28:33.175
so I'll just go through this quickly.

584
00:28:33.185 --> 00:28:36.375
We're near the end. We're also want to add an SMS chapter

585
00:28:36.685 --> 00:28:39.575
with guidelines, um, who are implemented for people

586
00:28:39.575 --> 00:28:41.415
who are implementing or improving an SMS.

587
00:28:42.165 --> 00:28:43.265
Um, we added this

588
00:28:43.265 --> 00:28:46.385
because the NTSB called the C revision

589
00:28:46.385 --> 00:28:48.905
of 40 40 26 unacceptable as a response

590
00:28:48.905 --> 00:28:50.105
to their safety recommendation.

591
00:28:50.715 --> 00:28:53.135
Um, they wanted more. So we're actually gonna add a,

592
00:28:53.135 --> 00:28:56.695
add a chapter on suggested stuff for SMS.

593
00:28:56.695 --> 00:28:58.495
It's gonna be more guidance than rules.

594
00:28:59.375 --> 00:29:02.515
Um, and it's just gonna be flight test specific stuff.

595
00:29:02.855 --> 00:29:07.205
So there's other places where you can go to, to, to learn

596
00:29:07.225 --> 00:29:08.405
how to implement an SMS.

597
00:29:08.405 --> 00:29:09.565
This is just flight test stuff.

598
00:29:11.945 --> 00:29:13.525
So next steps, I I need to talk

599
00:29:13.525 --> 00:29:16.365
with our certificate management folks about the degree

600
00:29:16.385 --> 00:29:21.025
of our, uh, involvement in design and manufacturing SMSs.

601
00:29:21.325 --> 00:29:25.825
Um, we, uh, I want to discuss SMS certification

602
00:29:25.825 --> 00:29:27.785
with the Flight Test Safety Committee, um,

603
00:29:28.005 --> 00:29:29.025
as I just mentioned.

604
00:29:29.785 --> 00:29:32.005
And, uh, we gotta get the document through internal review,

605
00:29:32.005 --> 00:29:34.005
and then we'll be sending a comment matrix out

606
00:29:34.005 --> 00:29:35.845
with the document to stakeholders,

607
00:29:36.015 --> 00:29:37.485
which is most of you in the room.

608

```
00:29:38.285 --> 00:29:40.265
Uh, I want to keep the lines of communication open,

609
00:29:40.805 --> 00:29:43.365
and in that interest, I should have put my email up,

610
00:29:43.425 --> 00:29:45.925
but it's addison dot tower@fa.gov.

611
00:29:46.345 --> 00:29:48.285
And if you want to come and get a card, I've got a bunch

612
00:29:48.285 --> 00:29:49.965
of them, um, afterwards.

613
00:29:52.045 --> 00:29:54.545
And, uh, we, we intend to have full involvement by,

614
00:29:54.605 --> 00:29:57.505
by stakeholders in this document, applicant's DS,

615
00:29:57.505 --> 00:30:00.675
foreign military, TSB, uh, anybody who wants

616
00:30:00.675 --> 00:30:02.435
to make comments, uh, let me know.

617
00:30:03.175 --> 00:30:07.285
That's all I got. Any questions, rod?

618
00:30:13.035 --> 00:30:15.625
Great work. And I'm glad you're working on a diversion.

619
00:30:16.055 --> 00:30:18.945
It's always better to have, uh, an improved document.

620
00:30:19.605 --> 00:30:22.425
But, uh, I was, as you know, part

621
00:30:22.425 --> 00:30:27.225
of the 40, 40 26 development, uh, the history, the, the,
```

622
00:30:27.775 --> 00:30:29.425
that order started

623
00:30:29.425 --> 00:30:31.985
before that accident, actually, we were working on it

624
00:30:32.685 --> 00:30:34.065
and that accident happened.

625
00:30:34.065 --> 00:30:35.185
It just proved the point.

626
00:30:36.065 --> 00:30:40.565
I mean, it, it's sad to to say, but that accident, just, uh,

627
00:30:40.565 --> 00:30:42.925
because IR one wasn't, and,

628
00:30:42.985 --> 00:30:45.005
and the match was in doubt of this, well,

629
00:30:45.145 --> 00:30:47.525
do we really need this order and this accident happened?

630
00:30:48.085 --> 00:30:50.045
I mean, what better proof do you need?

631
00:30:51.075 --> 00:30:53.675
So, yeah, so sse

632
00:30:56.055 --> 00:30:59.535
that's been a kind of a sensitive issue with me

633
00:30:59.535 --> 00:31:03.535
because the order wasn't strong enough in requiring OD to

634
00:31:03.635 --> 00:31:06.255
and DERs to submit ses.

635

00:31:07.455 --> 00:31:08.945
Most ODAs don't.

636
00:31:09.485 --> 00:31:12.625
In fact, the I'm in one ODA where I talk the manager

637
00:31:12.845 --> 00:31:15.625
to actually make every TIA say,

638
00:31:15.925 --> 00:31:19.065
you will report an s any safety significant event.

639
00:31:19.065 --> 00:31:20.585
But most O ds don't do it.

640
00:31:21.045 --> 00:31:25.185
So what happens is a lot of O ds work is going, is going on,

641
00:31:25.205 --> 00:31:26.665
and that database is lost.

642
00:31:27.845 --> 00:31:30.345
You, you're just not getting reports, right?

643
00:31:30.645 --> 00:31:32.225
And then when, when ACOs

644
00:31:32.285 --> 00:31:35.665
or man, uh, when, uh, the branch, uh,

645
00:31:35.665 --> 00:31:39.025
flight test branch managers get this SSC from this ODA,

646
00:31:39.025 --> 00:31:40.145
they don't know what to do with it.

647
00:31:41.505 --> 00:31:42.825
I know what to do with it. Do

648
00:31:42.825 --> 00:31:43.905
you know what to do with it? Oh

649
00:31:43.905 --> 00:31:44.905
Yeah.

650
00:31:45.015 --> 00:31:48.345
Okay. So, uh, so I would encourage you

651
00:31:48.365 --> 00:31:51.385
to put stronger language in requiring the ODAs

652
00:31:51.385 --> 00:31:52.425
and DRRS to report,

653
00:31:53.205 --> 00:31:55.265
not just say strongly occur. That's not gonna work.

654
00:31:55.955 --> 00:31:59.405
Okay? Um, the flight test safety database,

655
00:31:59.825 --> 00:32:00.885
the initial intent

656
00:32:00.925 --> 00:32:03.245
of the flight test safety beta database was

657
00:32:03.245 --> 00:32:04.725
to include lessons learned.

658
00:32:05.105 --> 00:32:07.525
But we learned soon that you couldn't do it

659
00:32:07.525 --> 00:32:10.645
because of pro proprietary proprietary information.

660
00:32:10.665 --> 00:32:13.245
You just couldn't do. So we went with the T HHAs.

661
00:32:13.545 --> 00:32:18.045
So, and I strongly feel that

662

00:32:18.395 --> 00:32:20.525
that appendix, whatever appendix is

663
00:32:20.525 --> 00:32:24.285
for the risk management part, be converted into an advisory

664
00:32:24.925 --> 00:32:27.285
circular, because that's how people use it

665
00:32:27.855 --> 00:32:30.995
in FAA order is only for FAA people.

666
00:32:33.135 --> 00:32:36.395
But people, uh, industry uses that order

667
00:32:36.455 --> 00:32:38.915
as an advisory circle 'cause it's guidance.

668
00:32:40.255 --> 00:32:44.595
And I submitted a proposal to change part 21.

669
00:32:44.935 --> 00:32:47.725
So, so we need to work on that

670
00:32:47.755 --> 00:32:50.965
because part 21 only says you're required

671
00:32:50.965 --> 00:32:52.365
to order emergency equipment.

672
00:32:53.145 --> 00:32:54.445
Excuse me. You're,

673
00:32:54.585 --> 00:32:57.925
and it should be changed to say you're required to have a,

674
00:32:58.245 --> 00:32:59.485
a risk management process

675
00:32:59.945 --> 00:33:02.085
and then let the parachute fall out of that,

676
00:33:02.785 --> 00:33:05.045
or whatever, helmets, whatever.

677
00:33:05.185 --> 00:33:08.085
So, uh, you have my recommendations

678
00:33:08.085 --> 00:33:11.485
and I, I, I really encourage that you actually act on it.

679
00:33:11.825 --> 00:33:13.245
So thank you. Thank

680
00:33:13.245 --> 00:33:14.245
You.

681
00:33:17.035 --> 00:33:19.605
Okay. Great presentation Allison. Thank you.

682
00:33:19.785 --> 00:33:23.885
Um, will Williams, Boeing, company a SO um, I think you kind

683
00:33:23.885 --> 00:33:27.185
of covered this, but I just want to get full clarification.

684
00:33:27.285 --> 00:33:31.045
So an SMS is either mandatory or voluntary.

685
00:33:31.465 --> 00:33:34.805
So if a flight test organization has a risk,

686
00:33:34.905 --> 00:33:37.005
an approved risk management process in place

687
00:33:37.865 --> 00:33:42.085
via the 40 40 26, can you just basically put

688
00:33:42.085 --> 00:33:43.525
that in the pillar two module

689

00:33:43.585 --> 00:33:47.085
and that that's your S-R-M-S-R-A depending on

690
00:33:47.085 --> 00:33:48.205
what else you may or may not do.

691
00:33:49.335 --> 00:33:52.595
Um, what I have found as, as our own SMS manager is

692
00:33:52.595 --> 00:33:56.405
that there are more hazards than just those associated

693
00:33:56.405 --> 00:33:59.285
with flying an aircraft and doing flight tests on it.

694
00:33:59.835 --> 00:34:01.855
Um, like when I change a training

695
00:34:02.135 --> 00:34:03.615
provider, are there new hazard?

696
00:34:03.715 --> 00:34:05.055
Are there risks associated with that?

697
00:34:05.275 --> 00:34:08.375
Um, so there has to be another risk management process

698
00:34:08.605 --> 00:34:10.655
outside of the flight test risk management process

699
00:34:11.545 --> 00:34:12.855
where you address those risks.

700
00:34:12.915 --> 00:34:14.095
We call it process risk

701
00:34:14.415 --> 00:34:16.925
Analysis, But yeah, there's,

702
00:34:16.925 --> 00:34:19.575
there's probably gonna have to be another process. Just

703
00:34:19.575 --> 00:34:21.535
Be kind of a subset of whatever the other

704
00:34:21.535 --> 00:34:22.735
risk management process is.

705
00:34:22.735 --> 00:34:25.175
Right. Okay. Thanks for the clarification. Yeah,

706
00:34:31.125 --> 00:34:32.125
Thank you.

707
00:34:34.065 --> 00:34:35.355
Alright, thanks Addison.

708
00:34:35.355 --> 00:34:38.485
We sure appreciate, uh, understand it's a

709
00:34:40.125 --> 00:34:41.285
monumental task here.

710
00:34:41.395 --> 00:34:45.485
It's a far reaching, uh, order

711
00:34:45.485 --> 00:34:46.805
that's really important to all of us.

712
00:34:46.905 --> 00:34:51.075
So appreciate you making it, uh, as up to date

713
00:34:51.075 --> 00:34:52.355
as it can be and helpful for us.

714
00:34:52.855 --> 00:34:53.715
Uh, so we're gonna.