

Comments on Safety Management System (Document ID FAA-2009-0671-0001)

The FAA is soliciting public comments on a potential rulemaking requiring certain 14 CFR part 21, 119, 121, 125, 135, 141, 142, and 145 certificate holders, product manufacturers, applicants, and employers (hereafter “product/service providers”) to develop a Safety Management System (SMS).

Please answer the following questions. If you are not familiar with a particular question, please answer unknown or not applicable.

1. Please tell us about your organization, including what products/services are provided, what FAA certificates you hold, approximate number of employees, and your approximate annual gross revenue.

2. Has your organization implemented an SMS or components of an SMS based on any of the guidance materials below?

Please describe your implementation experience.

- a. [FAA Order VS8000.367, AVSSMS Requirements, Appendix B.](#)
- b. [AC-120-92, Introduction to Safety Management Systems for Air Operators.](#)
- c. FAA-sponsored regulatory or voluntary programs (*e.g.*, Continuing Analysis and Surveillance Systems (CASS), Internal Evaluation Programs (IEP), Aviation Safety Action Programs (ASAP), *etc.*).
- d. Foreign civil aviation authorities’ SMS development material (*e.g.*, Transport Canada, Civil Aviation Authority of Singapore (CAAS), Australia Civil Aviation Safety Authority (CASA), U.K. Civil Aviation Authority (CAA)—please specify).

3. Please comment on the sufficiency of the following SMS guidance material, and what, if any, additional information you would need to implement an SMS.

- a. [FAA Order VS8000.367, AVSSMS Requirements, Appendix B.](#)
- b. [AC-120-92, Introduction to Safety Management Systems for Air Operators.](#)
- c. Foreign civil aviation authorities' SMS development material.
- d. Third party material (e.g., IATA Operational Safety Audit (IOSA), International Standard for Business Aircraft Operations (IS-BAO), Regional Air Cargo Carriers Association (RACCA), Air Cargo Safety Foundation (ACSF)).
- e. Other (please specify).

4. Do you currently have a quality management system (QMS) that meets some accepted standard (e.g., ISO-9000, Six-Sigma, Baldrige)? How would you envision your existing system operating in an SMS framework?

5. If you have voluntarily developed, or are in the process of developing an SMS, what impact has SMS had on your organization in terms of enhanced safety and compliance with existing CFRs?

6. Which types of product/service providers should be required to have an SMS and which, if any, should not? Please explain the reasoning for your opinion.

7. If you have implemented an SMS and conducted cost and benefits analyses, please describe your findings.

8.a. What are your main concerns and recommendations in making the transition to an SMS regarding the documentation requirements (*e.g.*, developing or updating manuals, policies, procedures, standard operating procedures).

8.b. What are your main concerns and recommendations in making the transition to an SMS regarding the recordkeeping requirements (*e.g.*, hazard identification data, risk assessment data, corrective actions).

8.c. What are your main concerns and recommendations in making the transition to an SMS regarding the collection, sharing, and management of safety information (*e.g.*, protection of and access to personally identifiable information, proprietary information).

9. What are the initial and recurrent costs of establishing and maintaining SMS processes (*e.g.*, internal auditing and evaluation, data collection, employee training, computer software, personnel hiring and training)?

10. What impact has SMS had on your organization in terms of the resources necessary to implement and maintain the system?

11. What new knowledge, skills, and abilities would your organization need, if any, to operate successfully within an SMS?

12. Please give us your thoughts about the current processes for procuring and using voluntarily submitted safety data through FAA programs such as Aviation Safety Action Program (ASAP) and how these programs would fit within an SMS framework.

13. What areas of the current regulations do you believe already incorporate SMS principles (*e.g.*, continuing analysis and surveillance system (CASS) under 14 CFR 121.373; quality or inspection system requirements under 14 CFR 21.143 and 21.303)? How would you suggest the FAA avoid any duplicative requirements in any SMS rulemaking effort?

14. What concerns and recommendations do you have about setting objective standards for the evaluation of SMS processes (*e.g.*, evaluating SMS effectiveness, defining scope of hazards, establishing acceptable levels of risk)?

15. What are practical ways a small business could apply the elements of an SMS?

16. What are your concerns and recommendations regarding the FAA making the transition to requiring SMS of product/service providers (*e.g.*, schedule for implementation, FAA acceptance and approval procedures, oversight)?

17. Please provide any additional information you think is pertinent.