

Suggestion Submitted	Ref	Section	Analysis	Recommendation	SB Decision
<p>As we all seek to increase the influence of IS-BAO/H/..., the small flight department (perhaps underfunded) group seems to have become somewhat vocal in the misperception that the IS-BAO is not suited to them; they perceive it to be too complex and oriented only to large flight departments. I encourage those overseeing the introduction and Chapter 1 to highlight the originally intended and continuing scalability of the IS-BAO. The first paragraph of IS-BAO 1.2 is good but it is quite subtle on this critical point.</p>	IS-BAO	1.2	<p>This section does not indicate the scalability of the IS-BAO to clearly include small operators. Also, verbiage related to Appendix A and Single Pilot Operations is not accurate as Appendix A provides terminology references. Single Pilot Operations was added to the end of Appendix B, the IG.</p>	<p>Modify all references to Appendix A regarding Single Pilot Operations to Appendix B. Modify first sentence of 1.2 to state: "The standards contained within this document are scalable, such that an operator of any size, regardless of equipment or mission, can enhance effectiveness and efficiency via IS-BAO implementation. The standards and recommended practices have been developed to be used for operation of a wide variety of aircraft, from small single-engine fixed and rotary wing aircraft conducting domestic operations only to large multi-engine, turbine-powered aircraft operating globally."</p>	<p>Agree. However modify second sentence to read, "Operators, both small and large, attest to the positive impact of the IS-BAO on their overall performance."</p>
<p>IS-BAO Section 3.2 of the IS-BAO should be reviewed to ensure they are consistent with Annex 19.</p>	IS-BAO	3.2	<p>Wording is slightly different from Annex 19 regarding "Coordination of ERP" and "Management of Change". Formatting of Annex 19 is improved so that each requirement is represented via an element number/letter.</p>	<p>Reformat SMS chapter to be aligned with Annex 19 element formatting so that each requirement has an element number/letter. Modify "Coordination of ERP" and "Change Management". See proposed.</p>	<p>Agree. Add ERP information regarding "return to normal operations" in the IG</p>

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<p>NBAA S&D Committee recommends adding a new standard: 4.1.1 d. a person responsible for managing the scheduling of aircraft and dispatching operations, as applicable.</p>	<p>IS-BAO</p>	<p>4.1.1</p>	<p>This would create an additional burden to the small operator, a sector of the BA community the IS-BAO program is continually trying to serve. IS-BAO 4.5.1 states, "Depending on the size and functions, a number of other personnel specialties may be required to ensure the proper performance of the organization. These specialties may include flight operations schedulers or dispatchers... The duties, authorities, and responsibilities for other personnel shall be described within the company operations manual. Sample descriptions of some of these specialties may be found in IG 4.1. All personnel shall be trained commensurate with their duties and responsibilities.</p>	<p>Remove from the standard 4.5: "Sample descriptions of some of these specialties may be found in IG 4.1" and make it a note after the standard. Add applicable information from NBAA S&D recommendation to the IG. Add after the standard 4.5, "Note: Sample position descriptions may be found in IG 4.1. For operators with dedicated scheduler/dispatcher functions, see the IG for example qualifications and duties."</p>	<p>Agree</p>

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<p>4.8, 6.13 and 9.3.2 should be consistent. All should be required for all operational safety critical job categories. All of these standards should be required (not recommended practices) for pilots, maintenance controllers, maintenance technicians, dispatchers/schedulers and ramp workers.</p>	IS-BAO	4.8	<p>ICAO Annex 6 Part 2 states: An operator shall establish and implement a fatigue management programme that ensures that all operator personnel involved in the operation and maintenance of aircraft do not carry out their duties when fatigued. The programme shall address flight and duty times and be included in the operations manual. Annex 6 Part 3 appears to focus on fatigue for flight crews. The IS-BAO currently reflects the intent of ICAO and the recommended practices do reflect industry best practices to cover everyone in the FMS without making them requirements. However, fatigue management should be addressed in chapter 4 to cover the entire organization.</p>	<p>Move all fatigue management standards and recommended practices to chapter 4. Delete the second sentence of 4.8 that begins with, "The program should include...". Move standard 6.13 to a new section 4.9 (with sub-elements). Make 6.13 RESERVED; Delete Fatigue Management under 9.1.4.m.</p>	<p>Leave FM information in its current location. Provide linkages to the other sections. Add a bullet for non flight crew in 6.13 "duty time" only, i.e. no flight time limits. Add terms in App A for Acft Crew, Flt Crew, Duty time, etc.</p>

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<p>Chapter 5.0 Training: The prescriptive periodicities associated with EPT (5.1.3.a.ii.A, 5.3.1), Aircraft Surface Contamination Training (5.1.3.a.ii.B) were put into the original IS-BAO to ease acceptance by regulators. There was general agreement that the prescribed periodicities would at some reasonable time be removed and that operator-specific risks and data should govern the need for specific topics and their associated periodicities. For this reason, I encourage the IS-BAO Standards Board to make consistent the performance basis of the IS-BAO in the training section by removing non-regulatory requirements, including periodicities. The exception is regulated / defined commitment content, specifically now the ICAO Technical Instruction on Dangerous Goods Transport or No Carry training, which must be included.</p>	IS-BAO	5.3.1	<p>The stated standards are prescriptive. They could be modified to be performance-based. ICAO A6P2 states, "3.9.2 Flight crew member emergency duties An operator shall, for each type of aeroplane, assign to all flight crew members the necessary functions they are to perform in an emergency or in a situation requiring emergency evacuation. Recurrent training in accomplishing these functions shall be contained in the operator's training programme and shall include instruction in the use of all emergency and life-saving equipment required to be carried, and drills in the emergency evacuation of the aeroplane." A6P3, 7.2 Flight crew member emergency duties, is very similar to A6P2. Aircraft Surface Contamination Training is not addressed in A6P2 or A6P3.</p>	<p>No change to Aircraft Surface Contamination Training. Modify 5.3.1 to read, "a. Emergency procedures training for each type of aircraft is required for all aircraft crew members and shall include instruction on the location and operation of all emergency equipment. b. The initial and recurrent training programme shall include training to competency for all emergency and life-saving equipment installed, as well as drills in the emergency evacuation of the aircraft. c. Recurrent emergency procedures training should be accomplished at least every 24 months. Note: See IG 5.3.1 for examples of items to be included in an emergency procedures training course. [Cut the current IS-BAO wording and paste it in the IG].</p>	<p>Agree, except make 24 month recurrent a standard.</p>

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5.1.6.d.iv and 5.2.2 Some maintenance personnel do indeed need CRM if they fly with the aircraft but the more targeted MRM which incorporates HF (the Dirty Dozen and more updated versions of HF) is likely more relevant in this section.	IS-BAO	5.1.6	Neither CRM or MRM is mentioned in A6P2 or A6P3. However, HF is mentioned 18 times in A6P2 and 21 times in A6P3 with linkages to ICAO Doc 9683, Human Factors Training Manual.	Modify 5.1.6.d.iv "HF and/or MRM" training and remove reference to CRM training. 5.2 Change title to Human Factors Training. Modify 5.2.2 to read like a recommended practice. Add 5.2.3 to include recommended periodicity. Add to IG: HF and MRM training guidance to include information such as the Dirty Dozen, ICAO Doc 9683 principles, etc. to IG. Get Len's input.	Agree
5.3.2 Is prescriptive. It should be performance-based.	IS-BAO	5.3.2	Same as the analysis for 5.3.1	Delete this standard and provide it as guidance in the IG.	Agree
5.1.3.ii Remove reference to MNPS and change to PBN and RNP	IS-BAO	5.1.3	Identified by the SB	Change as suggested	Agree
There should be a standard on how an operator selects and employs additional aircraft support from other operators to ensure providing adequate oversight of these activities.	IS-BAO	4.9	There are no ICAO SARPs for this topic.	Add a recommended practice to Chapter 4, 4.9 The operator should have a process to ensure that any operator contracted for additional air transport capacity is qualified and competent to perform operations safely and effectively.	Agree

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<p>6.11.2 is allowing a lax in safety as a norm. Having procedures for this is fine, but it adds and additional burden on operators with no value or enhancement of safety. Having the procedures given during each flight is still a method of compliance in my mind.</p>	<p>IS-BAO</p>	<p>6.11</p>	<p>Annex 6 P2 does not address this. The purpose of this standard is to allow a modified briefing when it is appropriate to do so, frequent passenger who knows the briefing very well, EMS, or other situations. The structure of the standard is grammatically incorrect as it repeats "for". The third bullet is vague and could be worded to encourage a proactive approach to enhance safety.</p>	<p>Modify 6.11.2 to read: 6.11.2 The standard safety briefing shall be performed for every flight except under the following conditions: a. regular/recurring passengers who are familiar with the aircraft, route and have repeated exposure to that type of flight, b. EMS operations where a standard passenger briefing is not practical, or c. other operations where the standard passenger briefing is not appropriate as determined by the pilot in command.</p>	<p>Agree</p>

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<p>6.4.5 The standard references deviations authorized by the state of registry. For example, US regulations reference the final approach segment or procedure turn inbound. Compliance with this deviation should not require any additional reporting. Suggest revision to Standard and Protocol to read: a. Are there procedures to restrict continuing an approach beyond the outer marker for precision approach or below 1000 feet above the aerodrome for a non-precision approach, "or in accordance with regulations of the state of registry", if the reported visibility is less than the specified minima, and similar language in b. and in the Standard.</p>	IS-BAO	6.4.5	<p>Many operators and auditors have contacted IBAC regarding this standard to gain clarity. Amdt 32 of ICAO A6P2 reworded this section as follows: 2.2.4.1.2 An instrument approach shall not be continued below 300 m (1 000 ft) above the aerodrome elevation or into the final approach segment unless the reported visibility or controlling RVR is at or above the aerodrome operating minima. Note.— Criteria for the Final Approach Segment is contained in PANS-OPS (Doc 8168), Volume II. 2.2.4.1.3 If, after entering the final approach segment or after descending below 300 m (1 000 ft) above the aerodrome elevation the reported visibility or controlling RVR falls below the specified minimum, the approach may be continued to DA/H or MDA/H. In any case, an aeroplane shall not continue its approach-to-land beyond a point at which the limits of the aerodrome operating minima would be infringed. Note regarding controlling RVR</p>	<p>Modify 6.4.5 to read: 6.4.5 a. <i>The operator should ensure that an instrument approach is not be continued below 300 m (1 000 ft) above the aerodrome elevation or into the final approach segment unless the reported visibility or controlling RVR is at or above the aerodrome operating minima. (Recommended Practice)</i>Note.— Criteria for the Final Approach Segment is contained in PANS-OPS (Doc 8168), Volume II.6.4.5.b. If, after entering the final approach segment or after descending below 300 m (1 000 ft) above the aerodrome elevation the reported visibility or controlling RVR falls below the specified minimum, the approach may be continued to DA/H or MDA/H. In any case, an aircraft shall not continue its approach-to-land beyond a point at which the limits of the aerodrome operating minima would be infringed. Delete 6.4.5 (c) and (d)</p>	<p>Modify 6.4.5 to read verbatim from as ICAO A6P2, except begin the standard with the phrase, "Unless permitted by the State of Registry and State of Operation,"</p>

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<p>I suggest that declaring a MAYDAY when landing with less than reserve fuel of 45 minutes is not an emergency situation and is contrary to information contained in the FAA InFO 08004. The terminology of "FINAL RESERVE" is OK for the purposes of the Standard to declare "MINIMUM FUEL" but I suggest another term "EMERGENCY RESERVE" is used, which an operator can nominate for each aircraft flown, that triggers the "MAYDAY MAYDAY MAYDAY FUEL" call.</p>	IS-BAO	6.2.5	<p>Annex 6 Part 2 Amdt 33 provides these definitions for final reserve fuel: For small, non-turbine aircraft: 45 minutes at normal cruising altitude or 30 minutes at normal cruising altitude (day VFR); For large or turbine aircraft: 1) for a reciprocating engine aeroplane, the amount of fuel required to fly for 45 minutes; or 2) for a turbine-engined aeroplane, the amount of fuel required to fly for 30 minutes at holding speed at 450 m (1 500 ft) above aerodrome elevation in standard conditions;</p>	<p>Change 6.2.5A to be performance-based. Include a note that indicates extensive fuel planning information can be found in the IG. Include Amdt 33 information in the IG.</p>	<p>Agree Revise to read, "6.2.5.1 An operator shall establish policies and procedures to ensure that the aeroplane carries sufficient fuel to safely complete each flight and land with the planned final reserve fuel. 6.2.5.2 The operator shall have a process to ensure the computed final reserve fuel meets the state of registry requirements taking into account possible more conservative values of the applicable requirements specified in ICAO Annex 6 Part II or Annex 6 Part III.."</p>

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<p>ICAO Admnt 33 to A6P2 relates to IS-BAO 6.4.3. Amdt 33 states: 3.4.2.7.1 An operator shall establish aerodrome operating minima in accordance with criteria specified by the State of Registry, for each aerodrome to be used in operations. Such minima shall not be lower than any that may be established for such aerodromes by the State of the Aerodrome, except when specifically approved by that State. Note.— This Standard does not require the State of the Aerodrome to establish aerodrome operating minima. 3.4.2.7.2 The State of Registry may approve operational credit(s) for operations with aeroplanes equipped with automatic landing systems, a HUD or equivalent displays, EVS, SVS or CVS. Such approvals shall not affect the classification of the instrument approach procedure. [Followed by three Notes regarding Operational credit]</p>	<p>IS-BAO</p>	<p>6.4.3</p>	<p>IS-BAO 6.4.3 reads: 6.4.3 An operator shall not operate to or from an aerodrome or heliport, using operating minima lower than those which may be established for that aerodrome or heliport, by the State in which it is located, except with the specific approval of that State.</p>	<p>No change to the standard. However, add notes to standards and link to the IG for information regarding HUD, EVS, SVS, CVS and operational credits. Add Amdt 33 information to the IG regarding the use of HUD, EVS, SVS, CVS and operational credits.</p>	<p>Agree Update IG as recommended.</p>

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Amdt 33 to A6P2 relates to IS-BAO 6.11.1 and 6.11.5 ; 2.2.2.3.1 The pilot-in-command shall ensure that passengers are made familiar with the location and use of: ...d) oxygen dispensing equipment if the use of oxygen is anticipated ; and...	IS-BAO	6.11	"if the use of oxygen is anticipated" was added. The IS-BAO is more conservative by not adding this statement. Also, operators would argue that they do not anticipate the need to use oxygen on any flight so they would never brief this.	No change	Agree
Amdt 33 to A6P2 relates to IS-BAO 6.2.2 regarding VFR. The new wording: 2.2.3.4.1 A flight to be conducted in accordance with the visual flight rules shall not be commenced unless current meteorological reports or a combination of current reports and forecasts indicate that the meteorological conditions along the route or that part of the route to be flown under the visual flight rules will, at the appropriate time, be such as to enable compliance with these rules.	IS-BAO	6.2.2	Current wording in IS-BAO: 6.2.2 VFR Flight A flight, to be conducted in accordance with visual flight rules shall not be commenced unless available weather information indicates that the meteorological conditions along the route, or that part of the route to be flown under the visual flight rules, will permit flight under visual flight rules. Note: When operations include high performance aircraft, consideration should be given to weather minima, VFR charts, training, routes, traffic, etc.	Delete the note as these considerations should be made by all operators regardless of the type of aircraft. Change the wording of the standard to match Amdt 33.	Agree

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<p>Amdt 33 to A6P2 relates to IS-BAO 6.2.3 regarding IFR flights. The new wording: 2.2.3.4.2 A flight to be conducted in accordance with the instrument flight rules shall not: a) take off from the departure aerodrome unless the meteorological conditions, at the time of use, are at or above the aerodrome operating minima for that operation; and b) take off or continue beyond the point of in-flight re-planning unless at the aerodrome of intended landing or at each alternate aerodrome to be selected in compliance with 2.2.3.5, current meteorological reports or a combination of current reports and forecasts indicate that the meteorological conditions will be, at the estimated time of use, at or above the aerodrome operating minima for that operation. 2.2.3.4.3</p>	IS-BAO	6.2.3	<p>Current wording of the ISBAO: 6.2.3 IFR Flight The operator shall establish procedures to ensure that: a. A flight to be conducted in accordance with the instrument flight rules shall not be commenced unless the available information indicates that conditions, at the aerodrome heliport, of intended landing or at least one destination alternate will, at the estimated time of arrival, be at or above the aerodrome or heliport, operating minima. The primary difference is the addition of the term "time of use" and the note stating that States of Registry will determine this, as well as the clause including the scenario of inflight re-planning, i.e. changing from a VFR plan to IFR plan.</p>	<p>No change except for modifying to include "time of use" and the two associated notes explaining this new term.</p> <p>Note: The State of Registry establishes criteria to be used for the estimated time of use of an aerodrome including a margin of time.</p> <p>Note: A widely accepted time margin for "estimated time of use" is one hour before and after the earliest and latest time of arrival. Additional considerations can be found in the Flight Planning and Fuel Management Manual (Doc 9976).</p>	Agree

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<p>Amdt 33 to A6P2 relates to IS-BAO 6.2.4 a; 2.2.3.5 Destination alternate aerodromes For a flight to be conducted in accordance with the instrument flight rules, at least one destination alternate aerodrome shall be selected and specified in the flight plans, unless:a) the duration of the flight from the departure aerodrome, or from the point of in-flight re-planning, to the destination aerodrome is such that, taking into account all meteorological conditions and operational information relevant to the flight, at the estimated time of use, a reasonable certainty exists that:1) the approach and landing may be made under visual meteorological conditions; and2) separate runways are usable at the estimated time of use of the destination aerodrome with at least one runway having an operational instrument approach procedure; or</p>	<p>IS-BAO</p>	<p>6.2.4</p>	<p>Current IS-BAO wording: 6.2.4(a) Destination Alternate Aerodrome For a flight to be conducted in accordance with the instrument flight rules, at least one destinationalternate aerodrome or heliport, shall be selected and specified in the flight plan, unless:a. the duration of the flight and the meteorological conditions prevailing are such that there is reasonable certainty that, at the estimated time of arrival at the aerodrome or heliport, of intended landing, and for a reasonable period before and after such time, the approach and landing may be made under visual meteorological conditions; or The primary difference is the additions of the term "time of use" and the requirement for 2 runways under a no alternate required rule.</p>	<p>Change 6.2.4 (a) to read: Modify with "time of use" wording. Add Recommended Practice that if the destination only has one runway that a destination alternate be planned and filed.</p>	<p>Agree. Wording for the RP, "6.2.4.2A At least one destination alternate aerodrome should be selected and specified in the flight plan if the destination aerodrome has only one usable runway with an operational instrument approach procedure at the estimated time of use. (Recommended Practice)"</p>

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<p>Amndt 33 to A6P2 relates to IS-BAO 6.2.4b. 2.2.3.5. b) the aerodrome of intended landing is isolated and;1) a standard instrument approach procedure is prescribed for the aerodrome of intended landing; 2) a point of no return has been determined; and3) a flight shall not be continued past the point of no return unless available current meteorological information indicates that the following meteorological conditions will exist at the estimate time of use: . . .ii) visibility of at least 5.5 km (3 NM) or of 4 km (2 NM) more than the minimum associated with the instrument approach procedure.</p>	IS-BAO	6.2.4	<p>Current IS-BAO wording, 6.2.4 b. the aerodrome or heliport, of intended landing is isolated and there is no suitable destination alternate aerodrome; andi. an instrument approach procedure is prescribed for the aerodrome or heliport, of intended landing; andii. available current meteorological information indicates that the following meteorological conditions will exist from two hours before to two hours after the estimated time of arrival:A. a cloud base of at least 300 m (1,000 ft) above the minimum associated with the instrument approach procedure, andB. visibility of at least 5.5 km (3 miles) or of 4 km (2 miles) more than the minimum associated with the procedure, whichever is greater.</p>	<p>Change 6.2.4 b to read: b) the aerodrome/heliport of intended landing is isolated and there is no suitable destination alternate and;1) a standard instrument approach procedure is prescribed for the aerodrome of intended landing; 2) a point of no return has been determined and the flight is not be continued past this point unless available current meteorological information indicates that the following meteorological conditions will exist at the estimate time of use: . . .ii) visibility of at least 5.5 km (3 NM) or of 4 km (2 NM) more than the minimum associated with the instrument approach procedure.</p>	Agree
<p>Amdt 33 to A6P2 provides extensive additions to fuel planning that are applicable to IS-BAO 6.2.5.A</p>	IS-BAO	6.2.5	<p>This change includes 3 pages of new or modified information. The SARPs are not performance-based but mostly prescriptive in nature. There are requirements to compute fuel amounts for the following items: taxi, trip, contingency, destination alternate with 3 possibilities, final reserve, additional fuel, discretionary fuel.</p>	<p>No change to 6.2.5.A other than final reserve fuel calculations. Add the new information in the IG and GCOM. Provide notes in the IS-BAO to bring attention to this new information.</p>	Agree

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<p>6.17 states: a. large or turbojet aeroplanes on the flight deck required to communicate through boom microphones below the transition level/altitude, Considering that in some countries [e.g. The Netherlands] the TA/TL may be as low as 3,000ft/FL40, I would suggest to add a statement such as: ... but not lower than (e.g. 10,000) feet.</p>	IS-BAO	6.17	<p>Waiting until TL may be too late for safety reasons in states where TL is well below 18,000 feet MSL. Many states have TA/TL well below this altitude. Also, 6.17a does not mention the use of headsets which is also a best practice for effective communications on the flight deck, while 6.17b does for helicopters. Also, 6.17 a. focuses on large or turbojet aircraft only, when wearing headsets and communicating via boom microphones is a professional practice for any aircraft.</p>	<p>Modify 6.17 to read: An operator shall ensure that flight crew members use headsets and communicate through boom microphones to the maximum extent practical to ensure effective communications, but at all times during critical phases of flight. Delete (b) as this applies to both fixed wing and rotary wing aircraft.</p>	Agree
<p>By adding the statement "for the purpose of flight" under 6.19H, the obvious safety concern regarding ground run-up and taxiing of helicopters is left unaddressed. This apparent loop-hole allows helicopters to be taxied and run, with the rotor turning, by anyone. Based on my recollection of previous policy, the intent has been lost in a change of words.</p>	IS-BAO	6.19	<p>ICAO A 6P2 states: 2.2.4.2 A helicopter rotor shall not be turned under power, for the purpose of flight, without a qualified pilot at the controls. The operator shall provide appropriately specific training and procedures to be followed for all personnel, other than qualified pilots, who are likely to carry out the turning of a rotor under power for purposes other than flight. Therefore, the issue identified by the person submitting this problem is solved by the complete wording.</p>	<p>Modify 6.19H to reflect A6P3. " A helicopter rotor shall not be turned under power, for the purpose of flight, without a qualified pilot at the controls. The operator shall provide appropriately specific training and procedures to be followed for all personnel, other than qualified pilots, who are likely to carry out the turning of a rotor under power for purposes other than flight. "</p>	Agree

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The IS-BAO should have a standard regarding stabilized approach criteria	IS-BAO	6.22	Most accidents are related to approaches that are not stabilized yet there is no standard related to this. The IG provides information on this topic. There is no standard. 6.21 recommends that pilots are competent in stabilized approach criteria.	Add standard 6.22 Stabilized Approach: 6.22.1 The operator shall define stabilized approach criteria and require a go-around if an aircraft is outside this envelope during an approach.	Agree
I included a suggestion that ADS-B be added to the list of required items in Element 8. It is already in use in Australia and Singapore. TCAS 11, Change 7.1. Upgrade is required in the EU by 1 December 2015.	IS-BAO	8	Many auditors and operators complain that the IS-BAO is too complex and time consuming, yet each year we have requests and perceived needs to keep adding to chapter 8 equipment requirements. Chapter 8 is prescriptive and could be replaced by two standards which are performance-based to ensure the aircraft are equipped in accordance with the state of registry and state of operations.	Keep standards 8.1, 8.1.1, 8.1.2 and delete all Chapter 8 standards that are related to equipment requirements. Keep standards related to documents required to be on board (8.3) and procedures for personnel to ensure safe operations. (8.5.5, 8.14.6, 8.14.7, 8.14.8, 8.15). Modify 8.1.1 appropriately to indicate all the requirements. Ensure the protocols match the standard.	Agree. Provide a link to the IG. Add SAFA checklist to IG also.
Consolidate Mx training to either Section 5.1.6 or Sect 9, currently seems repetitive	IS-BAO	9	9.1.4 (h) and (i) address maintenance training and records. This is repetitive.	Delete 9.1.4(h) make it "reserved". Delete 9.1.4.(i) and make this a requirement in 5.6 to ensure training records address everyone to include maintenance personnel.	Agree