



Agenda No. 1 - Call to Order

The Chair, Mr. Steve Fisher, called the meeting to order and conducted a roll call of Members and recognized others in attendance.

Members

Steve Fisher – Shell	Chair	Present
David Nigri- Textron	Vice-Chair	Present
Len Beauchemin – AeroTechna Solutions, LLC	Member	Present
Steve Brown – NBAA	Member	Absent
Pat Dunn	Member	Absent
Carl Evans – FedEx Corporate	Member	Present
Jens Hennig – GAMA	Member	Present
Francisco A. Lyra - ABAG	Member	Absent
Don Spruston - IBAC	Member	Present
Bill Stine - NBAA	Member	Present
Paul Stinebring – Past Chair	Member	Present
Dave Stohr - Air Training Intl.	Member	Present
Rudy Toering - CAE	Member	Absent
Juergen Wiese-BMW	Member	Present
Matt Zuccaro – HAI	Member	Present

Observers Present

Bob Bauer – Chairman, IS-BAO Audit Advisory Group
Ed DiCampi - HAI
Brian Humphries – British Helicopter Association
Mert Pellegrin – Van Allen Group
Stan Rose – HAI

Support Staff Present

Sonnie Bates	IS-BAO, Operations Manager
Jim Cannon	Director, IS-BAO Program
Peter Ingleton	Director, ICAO Liaison
Ray Rohr	Director, Regulatory Affairs
John Sheehan	IS-BAO Audit Manager



Action Required - Info Only

AGENDA

ITEM		OPI
1.	Call to Order	Chair
2.	Adoption of Agenda	Chair
3.	Review of Decision Record of October 18, 2010	Chair
4.	Action Items From Last Meeting	Spruston
5.	Standards Board Membership	Chair
	a. Terms expiring in 2011	
	b. New members in 2011	
6.	IS-BAO Activity Summary	Cannon
7.	Workshop Schedule	Bates
8.	Amendments to IS-BAO Standard and Audit Procedures Manual	Rohr
9.	Other Business	
	a. New Positions	Spruston
	c. Data Base	Sheehan
	d. Auditor Update	Sheehan
	c. Operator Update	Cannon
10.	Next Meeting	Chair
11.	Adjournment	Chair

Agenda No. 2 - Adoption of Agenda

The proposed agenda was unanimously adopted.



Agenda No. 3 - Review of Decision Record of October 18, 2010

The Decision Record of the Standards Board/11 meeting held on October 18, 2010, was reviewed page by page and a motion was made by Carl Evans to accept the 2010 Decision Record; David Nigri seconded the motion. The Chairman called for a vote and the members voted to accept the motion without a nay vote or an abstention.

Decision

The Decision Record of SB/11 was accepted.

Agenda No. 4 - Action Items From Last Meeting

Don Spruston reviewed the following action items generated by the 2010 meeting.

Attachment to Agenda Item 4 – Action Items Report – 2010 Meeting

Action Item	Status
Find CBAA representative to Standards Board	The CBAA has not nominated a replacement for Bill Boucher.
Identify and nominate helicopter representatives to the Standards Board	Matt Zuccaro has been nominated for one position and Brian Humphries, on a temporary basis, for the other position.
Hire new Standards Manager	Tom Accardi was selected as the IS-BAO Programme Manager but stepped down from the position in April 2011. Mr. James Cannon has been named the IS-BAO Program Director, responsible to the Director General for the overall management of the IS-BAO program. Sonnie Bates has been appointed IS-BAO Operations Manager, taking on responsibility for education and promotion and managing a cadre of specialists who will present workshops around the world. Kathy Perfetti retired in July upon completion of transition/ training of new staff.
Complete IS-BAO Business Model	Completion of the Business Model was announced on 6 June 2011 –The assessment and subsequent changes were driven by substantial growth and acceptance over the past two years of the community’s ‘code of safety practices’. A Task Force of IBAC personnel, IBAC Governing Board and Member executives worked over the past year to complete the business model review needed to meet the ever increasing demand. The Task Force endorsed many of the operating principles established in 2001. However, changes to the management structure and revenue/cost models were recommended to enable the sustained growth and value of the industry standard as it becomes increasingly more



	important to the future safety oversight programs required to keep the excellent safety record of business aviation constantly improving. The Business Model study report can be found on the IBAC home page at: www.ibac.org
Helicopter IS-BAO	The project to make the IS-BAO appropriate for helicopter operators was concluded in June 2011 and the proposed amendments will be considered at SB/12.
Government Acceptance of IS-BAO / Regulatory update	<p>FAA: FAA issued an InFo document to encourage all GA business and corporate operators to develop and implement an SMS; and, to provide info to GA operators of large and turbojet airplanes on ICAO SMS requirements. The InFO recognized IS-BAO as a means to develop and implement an SMS that may be acceptable to countries of intended operation. (InFO 11010 4/11/11)</p> <p>Europe: The EASA Opinion for Parts ORO and ARO include reference to officially recognized industry standards.</p>
Electronic revision process	Established for the 2011 IS-BAO revision.
Price increases 2011	Price increases for the IS-BAO put in place in January 2011. (\$950 to \$1200) Price increases for registration put in place July 2011 (\$250 to \$350 for initial registration/ \$75 to \$150 for renewal)
Auditor database	<p>Different vendor products were reviewed.</p> <p>A Statement of Work was developed an RFP issued and vendor selected.</p>
Ongoing:	
Workshops	
Introduction to IS-BAO Auditor Accreditation SMS Toolkit Workshop	Transition to Sonnie Bates/ Jim Cannon was begun in the spring 2011 and completed in July. Workshop costs reflect an overlap of staff personnel to accommodate training requirements.
ELearning product	The eLearning course SMS for Aviation Professionals was developed and released Jan 2011.

Discussion Points:

- Sonnie Bates will assume the coordination of E-Learning.
- The Management Committee will continue under the direction of the new Chair, Jim Cannon.
- HE-IS-BAO work is completed. One common IS-BAO to accommodate Helicopter Operations.
- Auditor accreditation and audit review going well. Audit monitoring needs more frequency.
- IS-BAO data base should be functional and online in six months. ARTIFAX is developing.
- All price increases in place and very little negative comments from operators and auditors.
- Standards Board feels that IS-BAO should avoid gaining additional revenues through the audit process.
- Old E-Learning course needs streamlining and updating. New course on line in January 2012.



Agenda No. 5 - Standards Board Membership and Terms

The current members and terms of office are as follows with notations of status changes:

Member	Position	Notes & (Term Expires)
Steve Fisher – Shell	Chairman	Retire Dec. 2011
David Nigri- Textron	Vice-Chair	New Chair, Jan 2011 (2014)
Len Beauchemin – AeroTechna Solutions	Member	(2013)
Pat Dunn	Member	(2012)
Carl Evans – FedEx Corporation	Member	(2012)
Jens Henning – GAMA	Member	(2013)
Francisco A. Lyra – CFLY Aviation	Member	(2013)
Don Spruston - IBAC	Member	Retiring in Dec. 2011
Bill Stine* - NBAA	Member	(2013)
Paul Stinebring** – Past Chair	Member	Resigning as of 10-9-11
Dave Stohr - Air Training International	Member	(2013)
Rudy Toering - CAE	Member	Jim Cannon to contact (2011)
Juergen Wiese - BMW	Member	New Vice Chair, Jan 2011 (2012)
Matt Zuccaro - HAI	Member	Newly Elected (2014)

*Bill Stine to be replaced by Doug Carr, NBAA

** Paul Stinebring will join the Audit Advisory Board

Action Required

- Steve Fisher has retired from Shell and has requested that his Chairmanship end in December 2011.
- Jim Cannon to contact Rudy Toering to ascertain his continued interest.
- Auditor participation as observers on the Board is welcomed (Don Spruston).
- Paul Stinebring’s new position as an ARGUS auditor necessitates his resignation from the Board.
- Don Spruston asked the Board to seek additional new members, two for next year.
- Bill McBride, and Rodrigo Duarte were mentioned as potential candidates.



Decisions

- Matt Zuccaro was nominated for election to the Board. David Nigri offered the motion, Bill Stine seconded. Motion carried unanimously.
- David Nigri was elected Chairman, commencing in January 2012.
- Juergen Wiese was elected Vice-Chair commencing in January 2012. Len Beauchemin offered the motion, Jens Henning seconded. Motion carried unanimously.



Agenda No. 6 - IS-BAO Activity Update

IS-BAO Sales

The following are IS-BAO sales reported through 1 September 2011 with comparative data sales for the full years of 2005- 2010.

MEMBER ASSOCIATION	IS-BAO SALES							
	2005	2006	2007	2008	2009	2010	JAN-SEPT 2011	TOTAL TO DATE
ABAA (Australia)					1	1	2	4
ABAG (Brazil)	-	0	0	0				3
BBGA (UK)	2	0	2	8	2	10	5	40
BAASA (S. Africa)	--	0	2	0	1			5
CBAA (Canada)	2	3	1	0	1	3	5	21
EBAA (Europe)	4	2	0	9	6	18	10	62
EBAA-F (France)	-	2	0	0				5
GBAA Germany	1	1	1	2	4	1	4	16
JBAA (Japan)	-	0	0	0				5
IBAA (Italy)					2			2
MEBAA (Middle E)					2	15		17
NBAA (US)	115	60	115	105	172	400	120	1367
RUBAA (Russia)						2	1	3
Total	124	68	121	124	191	450	148	1540

Discussions

Sonnie Bates reviewed the IS-BAO sales activity year to date. The large increase in sales during 2010 over 2009 was discussed and the general consensus was that the November 2010 ICAO deadline for states to adopt Annex 6 Part 2 was certainly a principal reason. Don Spruston interjected that sales in 2011 were expected to be approximately what occurred in 2009. Peter Ingleton suggested that some of the increase in 2010 could be attributed to timing issues, ie, completing a large order to NBAA at the end of 2010 of manuals.

John Sheehan then reviewed the accredited auditors and registered operator charts, listed below. John pointed out that although there are more than 300 accredited auditors, only 91 completed an audit in the past 12 months. John indicated that approximately 60 auditors were completing 90 % of the audits. At the current rate of operator applications, approximately 600 are estimated to be IS-BAO registered by the end of 2011.

Sonnie Bates discussed the activity level of all IS-BAO associates following the last Standard Board meeting to the 1st of October 2011. He presented a power-point overview which graphically displayed all of the events and workshops conducted.



Accredited Auditors*

State	2009	2010	2011	State	2009	2010	2011
Australia	2	4	5	Oman	0	0	1
Bermuda	1	1	1	Philippines	0	0	1
Brazil	2	2	5	Russia	1	1	5
Canada	5	7	11	Saudi Arabia	0	0	1
Caymans	0	1	1	South Africa	1	1	1
China	2	2	2	Spain	2	2	2
Germany	1	2	6	Switzerland	2	6	9
India	0	0	3	UAE	1	1	3
Italy	1	1	1	UK	14	18	20
Japan	1	1	1	USA	123	182	243
Luxembourg	2	2	2	Venezuela	1	1	1
Nigeria	1	1	1	Total	161	235	327

Registered Operators*

State	2009	2010	2011	State	2009	2010	2011
Australia	0	1	4	Malaysia	0	1	2
Austria	0	0	4	Malta	0	0	1
Bahrain	0	0	1	Netherlands	1	1	1
Belgium	0	0	1	Portugal	0	1	1
Bermuda	2	5	5	Qatar	0	0	1
Brazil	1	2	5	Russia	1	1	5
British Virgin Islands	0	0	2	Saudi Arabia	1	2	5
Canada	4	3	4	Singapore	1	1	1
Cayman Islands	0	0	4	Slovenia	0	1	1
China	1	2	6	South Africa	1	2	2
Egypt	0	0	2	Switzerland	3	6	9
Germany	1	5	11	UAE	1	2	2
Greece	2	1	2	Ukraine	0	0	1
Indonesia	1	2	2	UK	3	9	10
Italy	1	1	3	USA	158	257	452
Jamaica	0	0	1				
Jordan	0	0	1				
Latvia	0	0	1	Total	181	304	553

* October-September for the year indicated (currently through 1 October for 2011)

Registered Operators by Stage

Stage	
1	397
2	104
3	52

Noteworthy:

- > Total registrants increased 80% over 2010
- > Non-US registrants comprise 18% of total
- > 28% of registrants are in either Stage 2 or 3
- > Registrants are from 33 States
- > 91 individual auditors performed the 293 audits reported in the past 12 months.



Agenda No. 7 - IS-BAO Workshop Schedule

Discussion

Sonnie Bates continued his power point presentation outlining the workshops planned in 2011 and the proposed 2012 workshop schedule.

IS-BAO Workshops

The following are the results for workshops for calendar year 2007-2011.

The Auditor Accreditation workshop was added in the spring of 2010. Attendance at the workshops has been excellent. It should also be noted that the US government agencies that own and operate aircraft are pursuing IS-BAO registration. Some of the presentations and workshops were for government officials only. There are approximately 50 government auditors accredited as IS-BAO auditors.

Expenses are prorated for trips that included events in addition to the conduct of the workshop. Expenses include travel and salary costs (preparation/travel/workshop conduct), catering, facility charges, and workshop supplies and workbooks. Workshop revenues are calculated based on number of paid participants. Comp registrations are provided to all Government officials. In addition, operators are provided a comp workshop registration for hosting a workshop in their facility. If they additionally provide the catering, they are provided with additional (1-2) registrations dependent on the number of registered participants to offset estimated catering costs. This formula has been beneficial to the host organization as well as to IBAC (eliminates cost of facility and equipment rental, time to arrange catering/ location, hosting organization provides local advertising, etc.).

Date	Location	Attendance				Revenue	Expense	Profit (Loss)
		Operators & Others	Auditors Initial	Auditors Renewal	Total			
2007	9 workshops Jan - Dec	90	15	30	135	\$62,900	\$24,576	\$38,324
2008	14 Workshops Jan - Dec	106	19	23	148	\$63,000	\$31,996	\$31,004
2009	22 Workshops Jan - Dec	243	52	37	332	\$146,800	\$52,122	\$94,678
2010	43 Workshops Jan - Dec	383	241	52	676	\$388,870	\$119,549	\$269,320
2011	26 Workshops Jan - Sep	110	142	48	300	\$232,550	\$82,773	\$149,776
2011	12 Workshops Oct - Dec	10	10	30	50	\$60,000	\$30,000	\$30,000

Remaining 2011 Schedule (Oct-Dec)

Date	Location
October 27 & 28 (Intro and Auditor)	Atlanta, GA (Flight Safety Intl)
Oct 31 and Nov 1 (Intro and Auditor)	Burgess Hill, UK (CAE)
Nov 15 (Auditor Renewal)	Manchester, NH (Wiggins Airways)
Nov 29 and 30 (Intro and Auditor)	Morristown, NJ (CAE)
Dec 13 and 14 (Intro and Auditor)	Houston, TX (Marathon Oil)
Dec 15 (Auditor)	McLean, VA (GHS Aviation)



Preliminary 2012 Schedule

Month	Location	Workshop
Jan-12	Orlando, FL	Intro & Auditor
Feb-12	Daytona, FL	Intro & Auditor
Mar-12	San Diego	Intro & Auditor
Mar-12	ABACE	Intro & Auditor
Apr-12	Saudi Arabia	Intro & Auditor
May-12	Dallas	Intro & Auditor
May-12	EBACE	Intro & Auditor
Jun-12	Sacramento	Intro & Auditor
Jun-12	CBAA	Intro & Auditor
Jul-12	ARGUS	Intro & Auditor
Jul-12	GAMA	Intro & Auditor
Aug-12	Atlanta	Intro & Auditor
Aug-12	LABACE	Intro & Auditor
Sep-12	Boston	Intro & Auditor
Sep-12	UK	Intro & Auditor
Oct-12	NBAA	Intro & Auditor
Nov-12	Atlanta	Intro & Auditor
Nov-12	Dubai	Intro & Auditor
Dec-12	Morristown	Intro & Auditor
Dec-12	Boston	Intro & Auditor
Total Workshops	40	

Note: The above schedule is for planning purposes. If a member association request's, during the year, to have a workshop conducted and can ensure that a sufficient number of attendees will be in attendance, the workshop will be scheduled.



Agenda No. 8 – Amendments to IS-BAO Standard and Audit Procedures Manual

Appendix A of the 2011 Agenda was discussed in detail, led by Ray Rohr and discussed by various members of the Standards Board. Refer to Appendix A for details of the decisions made by the IS-BAO Standards Board.

Agenda No. – 9 Other Business

- a. New Positions – Don Spruston discussed the proposed addition of a part-time administrative assistant to help Paul Lessard during 2012 as he integrates the new data-base and a part-time audit monitor position to assist John Sheehan in fulfilling the audit monitoring commitment.
- b. Data Base – John Sheehan discussed the decision to purchase the services of Montreal based Artifax to custom build a relational data base which will include all of the past and present data concerning the IS-BAO Standard, Auditors, Operators, Audit Documents, Audit Results. Artifax was chosen due to their capabilities and their lower cost alternative.
- c. Auditor Update – John Sheehan discussed the feeling by the IS-BAO staff that the auditor program requires greater scrutiny. Auditor qualifications will be tightened and auditor monitoring will be enhanced. Proposals for changes to the credentialing of auditors will be presented to the Standards Board at the 2012 meeting.
- d. Operator Update – Jim Cannon led a discussion of the need for State I operators to be incentivized to move to Stage II and thus mature their SMS programs. Specific changes to the registration process will be offered to the Standards Board at the 2012 meeting.

Action Required

New position descriptions will be written and both opportunities will be filled with qualified staff.
The Data Base will be developed with an anticipated on line application of April, 1, 2012.
Proposed changes to the auditor credentialing program will be written and available for review and comment by April 1, 2012.
Proposed changes to the operator registration process will be written and available for review and comment by April 1, 2012.

Agenda No. 10 - Next Meeting

It is proposed to convene the next meeting of the IS-BAO Standards Board on Sunday, October 29, 2012, in Orlando, Florida, or the call of the chair if he deems it necessary to meet prior to that date. Note: NBAA convention will be held Oct 30–Nov 1, 2012, Orlando, FL.

Agenda No. 11 – Adjournment

The Chairman thanked everyone for their attendance and participation. The meeting was adjourned.



Appendix A to Agenda Item 8

IS-BAO and Audit Procedures Manual Amendments

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IS-BAO HELICOPTER PROJECT IS-BAO AMENDMENTS
MARCH 21, 2011

IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
General comment	It was suggested that the terms “flight department” and “company” should be changed to a more inclusive term such as “operator” and “organization”.	The terms were changed as suggested in most places. The one place where “company” was retained is when it refers to the “company operations manual” as that is a term used for related IS-BAO documentation. A note was added to section 2.7.5 and a footnote to section 10.1 on the use of this term.	Concur
Foreword	Add reference to the new inclusions/changes for helicopters	Helicopter and helicopter association references have been added.	Concur
1.0 – Purpose of the Standard	Add a line to include RW or re-define business aircraft operations	Helicopter referenced have been added	Concur
	Some of the amendments lack clarity.	Revisions were made to clarify the references to business aviation and to both commercial and non-commercial helicopter operations.	Concur
1.1 – General	Reference to quality system in EU-OPS will soon be obsolete	Reference removed.	Concur
1.2 – Applicability	Review reference to VLJ in Appendix A and how to include RW	VLJ reference retained and reference to HAI mission specific standards has been added.	Delete VLJ reference in Appendix A and GCOM and replace with single pilot ops as appropriate
		In order to make it more inclusive, the title of Appendix A has been changed to <i>IS-BAO Supplement – Single Pilot Operations</i> and reference to the HAI helicopter mission specific standards has been added.	Concur
2.0 – Introduction	Add helicopter reference to be more inclusive.	Numerous helicopter references have been added.	Concur
2.3 – Safety Management Philosophy	Some of the comments in this section are obsolete.	Safety management philosophy has been updated.	Concur
2.4 – IS-BAO Structure	Add references to helicopter and HAI mission specific standards.	References added.	Concur
2.7.2 – IS-BAO Standards	Add reference to Annex 6 Part III	References to Annex 6 Part III and HAI SMS Toolkit have been added.	Concur
2.7.4 – Determining Implementation Strategy	One reviewer suggests that “a workshop need first to be established and planned before.”	The IS-BAO workshops are planned at least six months in advance. The workshop schedule is coordinated with the local association and the schedule is posted on the IBAC web sites.	Noted
	One reviewer asked “will there be separate HE workshops?”	The differences are not great but it may be appropriate to have supplemental training modules for helicopter operators.	Will be reviewed after the first IS-BAO Workshop.

IS-BAO HELICOPTER PROJECT IS-BAO AMENDMENTS
MARCH 21, 2011

IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
	How will we separate auditors who are “qualified” to audit helicopter operations?	This has been addressed in the APM amendments	Accepted
2.7.5 – The Implementation Process	Address issue of GCOM for RW operators	Information on the HAI helicopter mission specific standards will be added as it becomes available.	Will be added in 2013 amendments
2.7.6 – Audit Preparation	Add information on the audit processes related to the HAI mission specific standards	Some information on the audit and accreditation processes related to the HAI HMSS has been added and more will be included as it becomes available.	Will be added in 2013 amendments
3.2.1 – Safety Policy and Objectives	Make reference to compliance with national standards	This is already stated in sections 1.1, 2.7.2, 3.2.1.a and 3.3.1.	Accepted
	Some revisions to the SMS requirements were suggested.	The current SMS requirements are those of the ICAO SMS Framework. As the ICAO requirements are the base line for the IS-BAO, no change has been made.	Accepted
3.4- Flight Data Analysis	Add “when available” as flight data recorders are not always available for helicopters.	It is a basic principle of the IS-BAO that operators apply only those provisions that are pertinent to their operation. This has been re-enforced in section 1.2 Applicability.	Concur
4.0 – Organization and Personnel Requirements	Cross check with Annex 6 Part III Sec 2 chapters 2 & 7.	The chapter was reviewed and no incompatibilities were noted.	Accepted
4.1 – Organization and Personnel	Is was suggested that this whole paragraph could be misleading to a European business organisation because it doesn't mention the EASA requirement to have an “Accountable Manager” at the top of the organisation (Part-OPS OR.GEN.210(a) refers). This person is normally the CEO (or equivalent) who has financial powers within the company. Perhaps it should add wording along these lines! How would this fit with the rest of the world requirements? Even the AMC to para 4.1 shows an Accountable Manager in post!	The term “Accountable Manager” is not used in Annex 6 Part II and for non-commercial ops in many States, but is included as part of a broader collective in the AMC.	Accepted
4.1.1	The Note is not fully correct.	The Note has been modified.	Concur
4.1.2	It was suggested that in the note the term “safety officer” be replace by “safety program manager”.	It is a well accepted fact that the director of operations or flight department manager is accountable for the safety of the operation, and as such, the organizations SMS. In larger organizations this person may assign responsibilities for certain SMS functions to a staff officer but it must be clear that he or she retains accountability for the SMS. Hence, it may not be wise to use titles that may indicate that this staff position has line accountability for the SMS. Accordingly it is recommend	Accepted

IS-BAO HELICOPTER PROJECT IS-BAO AMENDMENTS
MARCH 21, 2011

IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
		that the title not be changed	
4.2.1 - Aircraft Crew Member Duties and Responsibilities	A reference to the aircraft flight manual should be added.	Wording has been modified accordingly.	Accepted
4.2.3	Crosscheck duties with Annex 6 Part III and replace (b) "aerodrome" by "aerodrome/operating site" as helicopter uses mainly operating sites, (j) add before each departure or series of flights as helicopter are often involved in a series of flights, like sightseeing, helo etc."	Heliport added as per Annex 6 Part III terminology and a footnote was included indicating that heliports may include temporary landing sites or operating areas.	Concur
4.2.3	Change aeroplane to aircraft as appropriate.	Terminology was largely changed with the January 1, 2011 edition of the IS-BAO.	Noted
4.3.1 – Crew Member Qualifications	Add task specialist / ground and in-flight task specialist on page 4-2 (c) (see EU OPS- Part SPO),"	Task specialist has been added to 4.3.1.	Concur. Also add the term to the Terminology section.
4.3.2	Modify the recommendation to be more inclusive as helicopters are normally flown from the right seat.	A modification was made to the recommendation.	Concur
4.5 – Other Personnel	Add "HE ground support crew personnel qualifications"	Helicopter ground support personnel have been added and training requirements were added to AMC 5.1.	Concur
	Add reference to other persons not employed by the operator but required for the operation.	Material added.	Concur
5.0 – Training and Proficiency	Crosscheck with Annex 6 Part III chapter 10	Extensive revisions to Chapter 5 have been made.	Concur
5.1.1 – Training Programmes	Add testing to the training requirement.	Proficiency is addressed in para 5.5.	Accepted
5.1.3	The complete paragraph 5.1.3 is not totally suitable for EASA based operators because of the difference between what is written here and what EASA will require.	The IS-BAO reflects the requirements of Annex 6 part II and Part III – not specific State requirements. Para 3.4 requires operators to have systems and procedures to ensure compliance with the appropriate State rules.	Accepted
5.1.3.a.iv	Review requirement for first aid training for helicopter pilots.	While first aid training for pilots is not specified in Annex 6 Part III, a first aid kit is required equipment. Therefore, training in how to use the equipment would appear to be logical.	Accepted
5.1.3.c	Add HEMS medical team, observers, etc.	HEMS medical team, observers, etc. were added.	Concur
	Specify initial and annual training.	Initial and recurrent training was added as some of the recurrent training may be that which is only required every two years.	Concur
5.1.3.e	Add mission specific training	Mission specific training has been added to the Note.	Accepted

IS-BAO HELICOPTER PROJECT IS-BAO AMENDMENTS
MARCH 21, 2011

IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
5.1.3	Add CFIT / LTE / Vortex / Dynamic rollover (refer to the list and publication of EHEST report 2000-2005),	CFIT training is already included. Dynamic rollover, loss of tail rotor effectiveness and vortex ring training for helicopters was added.	Concur
5.1.3	Add ground support personnel training requirements	Added to 5.1.3 and as # 24 in AMC 5.1.	Concur
5.1.6	A comment was made that for an Ops Manual to be acceptable to an EASA Member State CAA, the Maintenance Training Programme will have to be included within a separate part of the Maintenance Approval somewhere. In my opinion this paragraph should be removed and transferred to the IS-BAO Maintenance Requirements.	The IS-BAO reflects the requirements of Annex 6 Part II and Part III not individual state requirements. See response to 5.1.3.	Accepted
	It was recommended that in 5.1.6.a the words “knowledge and skills” be replaced by “competence”.	The suggested revision was made.	Concur
	It was recommended that the following be added to 5.1.6.c “The recurrent programme should include up-to date knowledge of relevant technology, organization procedures, HF and SMS issues, aircraft type occurrences, regulatory changes and should be applicable and appropriate to the categories of personnel involved in maintenance”	Several of these items are included elsewhere and in addition this level of detail is not consistent with the performance based nature of the IS-BAO, so no change was made.	Accepted
5.2.2 - CRM/HF Training	Additional references were provided for guidance material.	The references were incorporated.	Concur
5.3.1 – Emergency and Safety Procedures Training	A comment was made that this para does not reflect the EASA legislative needs and mixes annual with triennial EASA requirements.	See response to 5.1.3 & 5.1.6.	Accepted
	A comment was made that EASA rules for Cabin Crew training differ significantly from what is written here	See response to 5.1.3 & 5.1.6.	Accepted
5.3.3	It was suggested to add a recommendation on helicopter underwater escape training (HUET) to personnel involved in over water helicopter operations in hostile environments where sea temperatures are low.	A recommendation has been added.	Concur
	HUET training should not be dependent on the sea temperature. Rather it should be dependent on whether or not the aircraft can make landfall safely in the event of requiring to complete an	The recommended practice has been modified.	Concur

IS-BAO HELICOPTER PROJECT IS-BAO AMENDMENTS
MARCH 21, 2011

IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
	emergency descent and landing (on water).		
5.5.2 – Proficiency Certification	It was suggested that this is insufficient for an EASA Member State; according to the Draft Part-FCL requirements, the examiner shall hold a licence at least equal to that held by the pilot being tested AND shall be qualified to fly the aircraft as PIC.	The draft EASA requirements are noted however please see response to 5.1.3 & 5.1.6.	Accepted
6.0 – Flight Operations	Crosscheck with Annex 6 Part III	Numerous revisions were made to Chapter 6 made.	Concur
6.1 – Standard Operation Procedures	Create link to HAI mission specific standards and include the list of mission specific standards either here or in the AMC	A Note has been added and details will be added when available.	Concur
6.1.1	It was suggested to add threat and error management	TEM was added.	Concur
	Add note on SOPS in helicopter specific mission standards.	A note was added.	Concur
	Add a recommendation for SOPs for single pilot aircraft.	A recommendation has been added for SOPs for single pilot aircraft.	Concur
6.2.1.1	Add “flight or series of flights”.	Flight or series of flights has been added.	Concur
6.2.3 – IFR Flight	Add heliport or landing site.	Heliport added as per Annex 6 Part III terminology and a footnote was included indicating that heliports may include temporary landing sites or operating areas.	Concur
6.2.5 – Fuel and Oil Supply Requirements	Add helicopter specific fuel and oil requirements	A separate helicopter fuel and oil requirements section has been added.	Concur
6.2.6 – Oxygen Supply Requirements	Some comments that this section is not applicable to helicopters.	Some helicopters operate above 10,000 feet and oxygen requirements are specified in Annex 6 Part III.	Accepted
6.2.7 – Extended Range Operations	This section is not applicable to helicopters.	The title has been changed to Aeroplanes.	Concur
6.2.8 Aircraft Performance	Needs to be modified to include helicopter considerations.	Has been revised to have an aeroplane section and a helicopter section	Concur
	Suggest the material from ACJ OPS 3.490 & 3.510 be included.	Annex 6 Part III material has been included.	Concur
6.2.9 – Refueling with Passengers On Board	A detailed procedure for hot fueling-defueling with passengers on board was offered and it was suggested that it be included.	A detailed procedure as proposed is inappropriate for the standards section of the IS-BAO. It would be appropriate to add a link to appropriate guidance material on the issue. Also a link to the FAA SAFO on hot refuelling was added.	Concur

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IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
	It was suggested that the requirement be added: The PIC / SIC shall assure all required bonding and grounding are in place prior to the initiation of the aircraft fuelling process.	The requirement has been restructured to be more performance based and to include all fuelling safety procedures.	Concur
6.2.9 – Refueling With Passengers on Board	It was noted that while there are procedures for hot refueling of helicopters, refueling of helicopters should not be conducted with passengers on board.	A note was added to this effect and a reference to FAA guidance material on hot refueling was included in the note.	Concur
6.4 – Weather Minima	Modify to include helicopter and heliport.	Has been revised to include helicopter and heliport.	Concur
6.5 - All Weather Operations	Add references related to CAT II & III helicopter ops.	The title of section 6.5 has been changed and para 6.5.2 has been added to address low visibly ops in helicopters as well as other related issues.	Concur
6.10 - Use of Oxygen	Some question of applicability for helicopters.	Use of oxygen is included in Annex 6 Part III.	Accepted
6.11 - Passenger Safety Briefing	Add helicopter related issues.	Several revisions have been made to 6.11 including briefing passengers prior to loading.	Concur
6.11.2	Add alleviation for omitting briefing when safety limits the capability of the pilot to conduct a briefing.	Alleviation has been added.	Concur
6.11.4	It was noted that “time” is a circumstance so it is redundant.	Reference to time was removed.	Concur
6.13 – Fatigue Management	It was observed that the title Fatigue Countermeasures has been generally superseded by Fatigue Management.	The section and AMC title have been changed	Concur
	Suggested revisions to the text to make it conform to current practices were made.	Several revisions were made to section 6.13.	Concur
6.17 – Microphones and Headsets	Add requirement for boom mike and headset for helicopters.	A requirement has been added.	Concur
7.5 – Standard Operating Procedures	Clarify that a SOP manual for international airspace operations procedures is required only for ops in PBN airspace.	A clarification has been added.	Concur
8.0 – Aircraft Equipment Requirements	This chapter needs extensive modification to reflect the requirements of Annex 6 Part III. A separate helicopter section maybe appropriate.	The chapter was extensively modified to include helicopter requirements.	Concur
8.1.1 - General	Add reference to Annex 6 Part III.	References were added.	Concur
8.2 – Instruments and Associated Equipment	Helicopter requirements must be addressed.	New sections have been added for helicopters	Concur

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IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
8.2.4	One reviewer suggests deleting the boom mike requirement as it is addressed in section 6.17	The required equipment is specified in chapter 8 and chapter 6 addresses use of the equipment. Hence, the requirement has been retained.	Accepted
8.3 – Operational Information and Documentation	It was suggested that some States provide for helicopter operators not carry documents on board when operating in the local area.	Local exemptions are not included in the IS-BAO and no general alleviation was identified, so no change was made.	Accepted
8.4.2.H – Seats, Safety Belts and Shoulder Harness	Certain helicopter operations may be conducted without the requirement of a seat for crew members.	A provision was added for conducting such operations unless otherwise prohibited.	Concur
8.5 – Emergency Equipment General	Revise to reflect Annex 6 Part III requirements.	A minor revision was made.	Concur
8.6 – Flight Over Water	Revise to reflect Annex 6 Part III requirements.	Extensive revisions have been made.	Concur
8.8 – High Altitude Flights – Oxygen Requirements	Add separate provision for helicopters.	A separate provision was added.	Concur
8.9.2 – Icing Protection and Weather Detection Equipment	Add separate provision for helicopters.	A separate provision was added.	Concur
8.10 - ELT	Revise as required to include Annex 6 Part III requirements and review 121.5 & 406 requirements.	Extensive revisions have been made to section 8.10.	Concur
8.11 – 8.14	It was suggested that a NVG section be added.	NVG will be addressed is helicopter specific mission standards, as appropriate.	Accepted
8.11 - GPWS	Review GPWS requirement for helicopters - EMS in USA.	Provisions were included for use of GPWS where installed.	Concur
8.12 – ACAS II	Check ACAS for helicopters	ACAS is required for aeroplanes only.	Accepted
8.13.2 – ATC Transponder	Check applicability for helicopters.	Helicopter transponder provisions were added.	Concur
8.14 – FDR & CVR	Revise to reflect requirements of Annex 6 Part III.	Separate helicopter provisions were added.	Concur
9.1 – Maintenance Control System	There was considerable deliberation on how best to deal with the significantly different EASA maintenance (continuing airworthiness) requirements.	It was concluded that the most appropriate solution was to simply require operators who fall under EASA rules to meet the EASA requirements. Hence, 9.1.2 was added.	Concur
9 – Aircraft Maintenance Requirements	Numerous editorial changes are needed to include helicopter items.	Numerous minor editorial changes were made.	Concur

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IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
9.1.9	Check maintenance program information for helicopters and revise to include requirements from Annex 6 Part III Attachment G.	Attachment G of Annex 6 Part III has been added to AMC 10.0	Concur
10.0 – Company Operations Manual	Add reference to Annex 6 Part III requirements.	Reference added and AMC 10.0 was modified.	Concur
12.2 – Environmental Management	Add reference to the HAI Fly Neighborly Guide	Reference and link added.	Concur
13.0 – Occupational Health and Safety	It was recommended by the Working Group assigned to review this chapter that it be deleted as it was not an operations safety issue and States deal with OHS in different manners.	It was because of the different approaches by States to occupational health and safety and that in many States the application of OSH rules to small organizations is very limited that it was included in the IS-BAO. The basic IS-BAO requirement is that the operator complies with national and local requirements and then it directs operators to various sources. The feedback from registered IS-BAO operators on this issue has been very positive, so it is recommended that it be retained.	Accepted
13.1	Add reference to HAI Safety Manual	The manual is currently under review and a hyperlink to it will be included when it is available.	Accepted
14.2 – Dangerous Good Transportation Requirements	Check alleviation in EASA Part SPO-Helo for dangerous good carried by sling loads or as part of their equipment.	No specific alleviation were identified, however Annex 18 provides for State to grant exemptions “ <i>provided that in such cases every effort shall be made to achieve an overall level of safety in transport which is equivalent to the level of safety provided by these provisions</i> ”. Hence it was concluded that Chapter 14 is appropriate as written.	Accepted
AMC 3.2 – Safety Management Systems	Add: The International Helicopter Safety Team (IHST) SMS Toolkit at http://ihst.rotor.com/Portals/54/2009_SMS_Toolkit_ed2_Final.pdf	The reference has been added	Concur
	Add: The European Strategic Safety Initiative (ESSI) at http://www.easa.europa.eu/essi/index.html .	The reference has been added	Concur
	On page 3 of the AMC the word “notify” needs to be placed between the words “immediately” and “the accident” in the phrase “authorities or military personnel who will immediately the accident investigation authority.”	The sentence has been corrected as suggested.	Concur
AMC 4.1 – Organization and Personnel	It was suggested that the organization structure be checked with EU OPS.	As is stated in several places in the IS-BAO the operator must meet all relevant regulatory requirements. Therefore, no change to the IS-BAO is required.	Accepted

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IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
Requirements	A revision to the note following 2.4.1 was suggested.	The suggested revision was made.	Concur
AMC 4.1 section 2.2.2	For helicopters the qualification for Chief Pilot should be CPL rather than ATPL. Also check Flight Ops Manger qualifications.	Chief pilot qualifications have been modified and other terminology has been changed to make it more inclusive.	Concur
AMC 4.1 section 2.5	Suggestion were made for revision of the duties and responsibilities of the Safety Officer	The duties and responsibilities were modified.	Concur
AMC 5.1 – Training Programmes	Numerous revisions proposed to include helicopter training issues.	AMC 5.1 has been revised to include helicopter issues.	Concur
AMC 5.1 para 5	Does this refer to the FAA Level C? If so, the JAA/EASA Level C has a different technical requirement and therefore this reference should spell out which underlying qualifying system is being discussed	The reference is to Level C as defined in the ICAO Doc 9625 - <i>Manual of Criteria for the Qualification of Flight Simulation Training Devices</i>	Accepted
AMC 5.1 para 7	In EASA, a Level C simulator would NOT be allowed to be used for zero flight time training. It would have to be a minimum of JAA/EASA Level D and even then, it may still not be approved!	The comment is noted and that is why the paragraph says "...some States...".	Accepted
AMC 5.1 para 15	"Demonstration of proficiency: is not an EASA recognized term. Any pilot upgrading SHALL pass the Proficiency CHECK in the appropriate seat prior to being released to the line as an "Under Supervision Captain"	See response to 5.1.3 & 5.1.6.	Accepted
AMC 5.5 – Pilot Proficiency Certification	Numerous comments on the relevance of these PPC test guides.	A number of civil aviation authorities have PPC test guides and other practical test guides on their web sites so it is proposed to delete this AMC and to provide links to several of these web sites in section 5.5.	Concur
AMC 6.1 - SOPs	Add Vortex, LTE, Dynamic rollover	Several helicopter specific items were added plus reference to the HAI Mission Specific Standards.	Concur
AMC 6.13 – Fatigue Management	Add helicopter considerations to runway incursion prevention info.	Helicopter considerations were added.	Concur
	Add helicopter operating considerations and reference to info in SKYbrary.	Several helicopter fatigue reference had been added.	Concur
AMC 9.1 – Aircraft Maintenance Control System	Check applicable weights and modify as required for helicopter maintenance control considerations.	Please see the comments associated with chapter 9 above.	Accepted
AMC 10.0 – Company	Revise reference to turbojet-aircraft to read turbine powered	Several wording changes were made to make the AMC more appropriate.	Concur

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IS-BAO Reference	Issue	Analysis and Proposed Action	Decision
Operations Manual		Attachment G from Annex 6 Part III was added.	
AMC 15.0 – Security Programme Attachment A	Several wording changes to Attachment A were recommended to make the Attachment more appropriate to helicopter operations.	Wording changes were made and “if applicable” inserted were appropriate.	Concur
AMC 15.0 Attachment B	Several suggestions were made for revision of the NBAA Voluntary Security Protocol for Part 91 Operators that is contained in Attachment B to AMC 15.0.	This protocol was a joint NBAA/Transportation Security Agency document that was developed for a specific purpose that will soon be obsolete and will be either significantly modified or deleted from the IS-BAO. Therefore, no revisions are recommended at this time.	Accepted
Appendix A – IS-BAO Single Pilot Supplement	Review the relevance of single pilot ops manual to helicopter ops and other references.	<p>The single pilot ops manual included with the IS-BAO is intended for use by an owner/operator of a small technically advanced aeroplane such as a Very Light Jet or a small twin engine turbo-prop, or where the owner employs a single pilot to fly such an aeroplane. While it could be adapted to be appropriate for a similar situation involving the non-commercial operation of a small turbine powered helicopter, a considerable amount of revision would be required.</p> <p>It is recommended that such should only be undertaken if an analysis of the demand for such an operations manual indicated that there would be a significant level of demand for the product and that it would be economically viable.</p> <p>Instead, revisions were made to Appendix A to make it more relevant to helicopter operations.</p>	Concur

IS-BAO HELICOPTER PROJECT APM AMENDMENTS
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APM Reference	Issue	Analysis and Proposed Action	Decision
Foreword	Use of the terms “flight department” and “company” are not appropriate for many helicopter operators.	In order to be more inclusive, such wording was replaced in the IS-BAO with “operator” and “organization” and similar convention was followed in the APM.	Concur
Foreword	It was further recommended that the term operator be used instead of organization throughout the document when describing the flight operation and organization when talking about auditing organization.	The use of the term operator only would not be appropriate when referring to an organization of which the flight operation is only a part of the organization. A corporate flight department is an example. Hence, the two terms have been used to describe to operator and the related organization, and “auditor” for the person or organization that conducts and audit.	Concur
1.1 - Purpose Statement	Inappropriate wording as noted above.	Changed from “business aviation flight departments” to “operator” in this section and throughout the document.	Concur
1.3 - Definitions and Terminology	The term operator is not defined and may be needed for clarity.	Added the term “operator” to the definitions.	Concur
2.1 - Background	Material should be added regarding the project to make the IS-BAO appropriate for helicopter operators.	Added material on the revision to the IS-BAO to make it appropriate for use by helicopter operators.	Concur
2.2 - Standards Board	The structure and operation of the IS-BAO Standards Board needs to be updated as does the title of the IS-BAO Standards Manager.	Updated the related material.	Concur
2.3 - Keeping the IS-BAO Current	The title Standards Manager has been changed.	Position title has been updated.	Concur
3.1.4 - Certificate of Registration	It was suggested that info on the availability of copies of the certificate are available for carriage on the aircraft.	Info was added.	Concur
3.2 - Authority for Registration	The recently created Audit Manager position is not referenced.	Added to the section.	Concur
3.3 - Authority for the Audit Program	Some terminology and references need to be updated.	Made required revisions.	Concur
3.4 - Accredited Auditors	With the expansion of the scope of the IS-BAO to include helicopter operators the scope of auditor accreditation needs to be revised accordingly.	Added in material on the scope of auditor accreditation for fixed wing, rotary wing and both and the application of the new scope of accreditation.	Concur
3.5 - Auditor Qualifications	This section needs to be updated to amplify the new scope of auditor accreditation.	Added material on the criteria for the new scopes of auditor accreditation.	Concur
3.6 - Helicopter Mission Specific Standards	The new related element needs to be referenced.	Added material that addresses the HAI plans for the process to accredit auditors who will conduct the helicopter mission specific standards audits.	Concur

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APM Reference	Issue	Analysis and Proposed Action	Decision
3.7 - IS-BAO Workshops	The IS-BAO Workshop info needs to be updated.	Updated IS-BAO Workshop information.	Concur
3.9.2 - Transparency and Disclosure	Typo in second line	Error corrected	Concur
3.10.5	It was suggested to revise the last sentence of the para to read "...should be provided as soon as a "specific" non-conformity is identified or suspected.	Revision was made.	Concur
3.13 - Audit Monitoring	It was suggested that the audit monitoring program be addresses as it is in section 2.7.6 of the IS-BAO.	Similar paragraph was added.	Concur
4.2 - Audit Standards	Explanatory material in needed on the new material in the IS-BAO related to the aircraft category.	Added explanatory material.	Concur
4.4.2	It was suggested that the auditor confirm that the operator has an authorized and current copy of the IS-BAO by confirming that they have a password that permits them to download updates to the IS-BAO.	Appropriate wording was added.	Concur
	It was suggested that we strengthen the suggestion that the auditor have the operator provide a completed copy of the audit protocol because this has proven to expedite the audit process.	Appropriate wording was added.	Concur
4.7 - Using the Audit Protocols	Explanatory material in needed on the new material in the IS-BAO related to the aircraft category.	Added explanatory material.	Concur
4.8 - Conducting the Audit	It was suggested that we add guidance that the auditor should interview a variety of operator personnel	Appropriate wording has been added as 4.8.2.	Concur
4.11.2 - Closing Meeting	It was suggested that the term "manger of the operation" be changed throughout the document to "operations manager".	The terminology "manager of the operation" was used because operations conducted by organizations, such as law enforcement agencies, may be managed by someone whose title is not "Operations Manger". Hence, use of more inclusive terminology is recommended.	Concur
5..5 - Preparation to Evaluate the SMS	It was noted that item "a" of the para refers to a safety risk profile which is not required by the Standard.	Added "or equivalent hazard identification and risk analysis system" to the item.	Concur

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APM Reference	Issue	Analysis and Proposed Action	Decision
5.8 - Conducting the Evaluation	It was noted that some auditors and operators have difficulty linking the evaluation points to the SMS requirements specified in the Standard.	Some evaluation points were amplified and all were linked to the SMS requirements in the Standard.	Concur
	It was suggested that the evaluation material be added to IS-BAO AMC 3.2.	The SMS evaluation material is already contained in the IS-BAO Internal Audit Manual and the SMS Toolkit plus it is referenced in AMC 3.2 of the IS-BAO. Reference to it was also added to para 2.7.6 of the IS-BAO Standards.	Concur
5.8.1 - SMS Sage One Evaluation	The full exclusion of items 9 and 11 from evaluation of appropriateness for a Stage I SMS evaluation was questioned.	The two items were modified to indicate that they are usually only assessed for soundness.	Concur
5.8.2 - SMS Stage Two Evaluations	It is suggested that "new missions" be added to the second para.	New missions were added.	Concur
6.1 - Audit Findings	It was recommended that the definition of a finding be bolded and the definition of finding plus other essential terms be added to section 1.3.	The definition was bolded. Most of the terms were already in section 1.3 and the few that were not there were added	Concur
6.2.3 - Making Findings	It was noted that there is a tendency for auditors to not always analyze non-conformities to the depth necessary for identify the cause(s) of the problem.	The related sentence was bolded.	Concur
7.1 - Report Standards	It was suggested that 7.1.3.e be modified to read "findings based on major-nonconformities must be rectified "prior to submission of the audit report to IBAC".	Modified accordingly.	Concur
7.3.3 - Audit Report Contents	It was suggested that additional information be included on the scope of Remedial Action Plans.	Information was added.	Concur
8.2 - Detailed IS-BAO Audit Protocol	The protocols need to be revised to reflect the revisions to the IS-BAO standards and recommended practices.	Updated as required.	Concur
	The additional items were identified and address as noted.		
	Item 4.2.1 should be expanded to include the aircraft flight manual or other document associated with the C of A,	Suggestion was accepted and the IS-BAO and APM amended accordingly.	Concur
	In items 4.3.1 and 4.6.1 , and perhaps in other instances in the document, the spelling of licence is inconsistent.	All instances of the spelling license have been changed to licence in both the IS-BAO and APM.	Concur
	Item 4.3.2 – The amalgamation of helicopter and aeroplane requirements into one recommended practice results in a rather convoluted requirement.	It was concluded that the two recommended practices should be separated into one for aeroplanes and one for helicopters. Accordingly the IS-BAO and APM have been amended.	Concur

IS-BAO HELICOPTER PROJECT APM AMENDMENTS
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APM Reference	Issue	Analysis and Proposed Action	Decision
	Item 4.5.1 lacks clarity.	Wording was modified to enhance clarity.	Concur
	Item 5.1.5 – it was recommended that “where appropriate and/or available” be added.	The modifier “ <i>to the maximum degree practicable</i> ” is already included in the standard.	Concur
	Item 5.2.2 – it was suggested that initial and recurrent CRM training be added.	The requirement as written accurately reflects the recommended practice stated in the IS-BAO.	Concur
	Item 5.3.1 – It was suggested (when applicable) be added to the requirement as not all items may be applicable.	The Standards in the IS-BAO states as “when equipped” so the item has been modified accordingly.	Concur
	Item 6.11 – the appropriateness of an alleviation for the passenger safety briefing was questioned.	In HEMS and some SAR ops a passenger briefing is not required or appropriate, so the alleviation is included in 6.11.2 of the Standard.	Concur
	Item 8.7 - typo “area” should read “areas”.	Corrected	Concur
	Item 10.2 – the specification of requirements for an ops manual for non-commercial ops only was questioned. Would it not be more appropriate to have a general requirement for all ops manuals?	In the Standard a differentiation of requirements was introduced. Upon review it was concluded that the new requirements were more complex than needed and could be simplified. Accordingly, the Standard and APM were simplified.	Concur
	Item 13.1.f – the requirements should include storage as well as handling.	This is a valid observation that obviously has been an oversight. “Storage” was added to the IS-BAO and APM.	
	Audit Finding Form – It was suggested that we modify the Audit Finding Form from a segmented format into a spreadsheet format so as to make it easier to track and compare findings, evidence, action plan, etc.	The suggestion was examined and it was concluded that such a format would introduce a number of complexities that may result in a significant less user friendly form. Accordingly, it is recommended that the idea be put on hold pending the investigation of the use of audit reporting software which would totally restructure the audit and reporting process.	Accepted
	Audit Report Form – It was suggested to change the form to read “Number of Days <u>on Site</u> ” to clarify the intent.	Agree that was the intent so the amendment was made.	Concur
	Audit Report Form Recommendations to the IS-BAO Standards Board - Change the statement to, “Suggestions to IS-BAO Standards Board <u>to Improve or Clarify IS-BAO Standards or Audit Procedures.</u> ”	Agree that was the intent so the amendment was made.	Concur
	Audit Report Form – revise the statement at the end of the form to indicate that the referenced documents should be included in the electronic file submitted to IBAC.	The current wording was used when the documents were submitted in paper form so the suggestion is appropriate and the change has been made.	Concur

Issues for 2012 IS-BAO Revision

IS-BAO Reference	Comments & Issues	Analysis and Proposed Action		Decision
General Comments				
1. Amendment Publication Process	Some IS-BAO users commented that there was some confusion on their part as far as our 2011 revisions for our IS-BAO manual and audit protocols for 2011. I think the switch to electronic needs to be communicated better to those who have ordered the Manuals and the toolkit.	This has been an ongoing problem and will be further addressed		Accepted
2. Review all policies and bulletins	All policies and bulletins should be reviewed to ensure the required changes are included in IS-BAO and APM	Included	Not Included	Accepted
		Policy2010-05 Policy 2010-03 Policy 2010-02A Policy 2010-01	Policy 2010-06 - Specialised issue Policy2010-04 - Relates to listing on web site Policy 2005-1 - Specialized issue Policy 2005-2 – Specialized issue These Bulletins contain only info that need not be included in the IS-BAO documents.	
3. Registration Forms	Make sure Registration application and renewal forms in both IS-BAO & APM have current cost data	Completed		Accepted
4. Specificity of IS-BAO Standards	An operator commented that the IS-BAO standard, the GCOM and the SMS Toolkit were great tools that helped get them prepared. However they did struggle with some of the more vaguely defined standards.	Efforts are ongoing to make the standards user friendly		Accepted
5. Separate IS-BAO Standards for Stage 2 & 3	An auditor suggested that a different set of standards be developed for Stage 2 and Stage 3 operators.	The maturity stages refer to the operator's SMS only and not to other IS-BAO requirements. Therefore, it suspected that the auditor is referring to the SMS Evaluation questions in chapter 5.8 of the IS-BAO Audit Procedures Manual. As noted in that section, these evaluation questions are intended as examples for operators to develop their own customized evaluation. Additional wording has been added to re-enforce this.		Concur
6. IS-BAO Standards becoming overly prescriptive	A comment was revived stating that it appears that there may be a creep toward prescriptive over performance based requirements. It was suggested that it is tempting to lean back toward prescription when an idea or seemingly critical issue is brought up, yet this is a way to make the IS-BAO bloat with overly complex rules. If these 'rules' apply more to one group or jurisdiction than another, we risk losing much of the hard won credibility the IS-BAO enjoys, by reducing the breadth of the applicability of the standard.	We agree that it is a constant battle to maintain a good balance between performance based requirements and specificity, but an objective we must strive for. It will be complicated by the inclusion of some helicopter specific requirements, but in that process we have striven to ensure there is clarity of to whom the requirements apply.		Accepted

Issues for 2012 IS-BAO Revision

IS-BAO Reference	Comments & Issues	Analysis and Proposed Action	Decision
7. Incentive for operators to mature their SMS	<p>Information has been received from auditors that some operators have failed to progress from stage 1 to 2 SMS maturity. It has been proposed that additional incentives be added to the program to prevent these operators from ignoring the continuous SMS improvement intent of IS-BAO. It has been suggested that some operators seek registration for show purposes, either to look good for their corporate hierarchy or for their insurance company. Therefore it was proposed that an operator failing to progress to the next SMS maturity stage be given a conditional registration. Full registration would be granted following a successful audit leading to the next stage conducted within 12 months after the audit where they failed to progress to the next SMS maturity level. If the operator did not comply with the 12 month audit requirement or failed again to progress to the next SMS maturity level, they would lose their registration for a minimum of one year.</p>	<p>This issue has been discussed and it was agreed that positive incentives should be explored rather than punitive measures.</p> <p>It was also noted that if any punitive measures were to be introduced they would have to be clearly specified standards with specific evaluation criteria.</p> <p>Consequently, it is recommended that no punitive measures be introduced at this time and that opportunities for positive incentives be explored over the next year.</p>	Accepted
8. New standard	<p>An operator has suggested that a standard be added requiring that FAR 135 certificated AOC Operators ensure that they have obtained proper Charter Landing Permits before dispatching to a foreign country.</p>	<p>The IS-BAO does not specify individual national civil aviation regulations but it does contain provisions that capture such requirements such as:</p> <p>3.3.1 Each aircraft operator must establish and maintain a system for identifying applicable regulations, standards, approvals and exemptions and demonstrating compliance with them.</p> <p>6.7.1 An operator is responsible for identifying and complying with all aircraft operating rules that the operator is subject to, as required by the civil aviation authority of the State of Registry and the States in whose airspace the operations are being conducted.</p> <p>Consequently, it is recommended that this suggestion not be accepted.</p>	Accepted

Issues for 2012 IS-BAO Revision

IS-BAO Standard Issues			
3.5 - Freedom of Choice	An operator commented that in preparation they had to consult two separate consultants to get a clear picture of the requirement and if it pertained to them. They were that they should have an HR policy that gives our employees i.e. crew members the freedom of choice on assigned aircraft duty.	This recommended practice was changed to an information note in the January 1, 2011 edition of the IS-BAO, consequently no action is required. However the note was modified to ensure it is understood that it applies to persons who fly as passengers.	Accepted
4.3.2 -Right seat landing and takeoff recency requirements	An auditor commented that it should be made clearer in the standard that this is in reference to a program for the operator to implement a policy to ensure proficiency if crew members performing right seat t/o's and landings in the case of PIC incapacitation etc. This would be a great AMC item to reference to provide more guidance.	This provision is a recommended practice and it is not current practice to include material to justify recommended practices. Additionally, the current AMCs address only major standards sets and not any recommended practices. Consequently, it is recommended that this recommendation not be accepted.	Accepted
4.2.3.o - PIC responsibilities	It was noted that this requires reporting to ATC and it was questioned if it is a SARP? If not, it was suggested that the wording be changed to something like "appropriate body/ authority".	This requirement is stated in PANS-ATM para 16.6.1. Consequently, no further action is recommended.	Accepted
4.6 – Use of Psychoactive Substances	It was questioned why this recommendation is in the IS-BAO, as it seems rather ideologically driven. If it is going to be made, why would we not also include alcohol? Or prescription medications? (The commenter noted that he was not an advocate for addition, but suggested removal as this seems too obvious, it's like saying "be professional").	This recommended practice is included in Annex 6 Part I, para 2.1.3 and Annex 1 para 1.2.7. What constitutes psychoactive substances is explained in a note in para 4.2. Consequently, no further action is recommended.	Accepted
5.0 - Training	It was noted that when we set the original training section of the IS-BAO it was felt that not prescribing periodicities for some topics would be too radical to gain acceptance. It is suggested that soon, prescribed topics and periodicities should be removed and that as part of an operator's safety management activities, the operator's training needs should be driven by their State requirements and particularly by their risks. This should drive topic selection and the associated frequency of training for each topic, by trainee. We may not be ready for this yet but 5.1.3.e is an example of how we tried to set the tone early on to prepare for this	It is agreed that training, other than core training, should be driven by the operators SMS processes. The requirements in Chapter 5 are structured accordingly, with only the periodicity for core safety training specified. Consequently, no further action is recommended.	Accepted
5.1.3.e.v – aircraft upset recovery training	It was commented that considering the attention being given to LOC-I and upset training, it is clear that the note implying that flight simulators are adequate for upset	It is agreed that upset training in aircraft is very effective, but the availability is limited and to make it a requirements would not be in keeping with the	Accepted

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	recovery training may not be advisable. Certainly many departments are going to APS and other schools to receive blended training with classroom, online, simulator (generic and upset simulators) and aircraft based training through integrated syllabi.	performance based approach of the IS-BAO. Consequently, no further action is recommended.	
5.2 - Human Factors Training	It was suggested that the area of Human Factors has now, at least in the minds of many, subsumed TEM, CRM, Human Factors for Pilots, Fatigue Risk Management, Physiology (High Altitude, etc), and other topics so that this topic should become a master class or simply not refer to Human Factors if you wish to highlight CRM	Para 5.2 addresses both CRM and Human Factors training is a broad manner and specifically requires CRM training for aircraft crewmembers. Therefore, the comment would appear to be addressed.	Accepted
5.3.1.1 – Emergency procedures training for passengers	It was noted that the recommendation is agreeable, but recommended that the word “frequently” should be replaced with “regularly” and that the periodicity should be set as part of the operator’s assessment of training needs.	There is no problem with changing the word from “frequently” to “regularly” but it probably does not change anything. Again telling the operator as to “how” to do this may not in keeping with the performance based approach to the IS-BAO. Consequently, no further action is recommended.	Accepted
5.3.1.j – Emergency patient transportation	A comment was made that this requirement is not well drafted and not understood.	The text has been modified to clarify the requirement.	Concur
5.3.2 - Cabin crew member training	It was commented that it is curious that this requirement is annual. The commenter doubted that a Flight Attendant needs to be reminded annually in formal training that the Captain is in charge. If this annual requirement is aimed at FA’s that fly infrequently, then we are requiring staff, full time FA’s to take training which will become decreasingly meaningful to them.	This requirement was presented by the NBAA Flight Attendants Committee and we are reluctant to make changes unless we have an identified problem to take back to them for review. Consequently, no further action is recommended.	Accepted
5.5.2 – Pilot proficiency certification	It has been suggested that in situations where there is no licensing or other requirement for a pilot to have passed a proficiency check it would be logical for the chief pilot to do such check.	This would appear to meet the intention of the IS-BAO requirements, therefore, it is suggested that the chief pilot be added to the list of person who may do a PPC.	Concur
6.2.3.2 & 6.2.4 – IFR destination alternates	It has been observed that section 6.2.3.2 and 6.2.4 differ in structure for Annex 6 Part II and the difference may cause ambiguity.	While the structure is different the text is the same as Annex 6 Part II but in order to avoid ambiguity it would be appropriate to align the text with Annex 6 Part II.	Concur
6.2.6 – Oxygen Supply Requirements	The second paragraph is not numbered but it addresses a situation separate from the first paragraph.	This observation is correct. Therefore, it is proposed that paras a & b be restructured and make the current a and b subsets of paragraph a.	Concur
6.3.1.c – Pilot reporting of the aircraft’s departure and arrival	It was suggested that the requirement it is likely unattainable or inapplicable for an owner pilot flight department	As the requirement is written, if the owner operator has nobody to advise other than the normal ATC flight following all they have to do to meet the requirement is to not include any reporting requirements in their ops manual.	Accepted

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		Consequently, no further action is recommended.	
6.4.6 - Minimum safe altitudes	The FAA has issued an InFO on this issue and problems that may be created by certain atmospheric temperature and pressure situations.	It is proposed to add a Note and include a URL to the InFO.	Concur
6.11 – Passenger briefing	It was suggested that a provision be added to require that that operators ensure that the passengers understand the scope of duties of all crew members who have duties in the aircraft cabin.	This is only applicable when a person is assigned to service duties in the cabin but is not a trained cabin crew member and will not be performing safety duties. While not meeting the full intent of this suggestion, it should be noted that 6.11.4 requires a briefing on evacuation procedures where the issue would be addressed. Additionally, such a provision would tend to diminish the status of trained cabin crew by requiring the scope of their duties to be addressed in the passenger briefing. Consequently, it is recommended that this suggestion not be accepted.	Accepted
6.13.1 – Fatigue Countermeasures	It was suggest that the wording should recognize the move toward Fatigue Risk Management systems and processes, such as adjusting duty times according to various data collection and analysis methods. This could be accomplished by saying something like: "...shall contain at least..." and that reference to FRMS/ data methods should be made.	The title of 6.13 has been changed to Fatigue Management and in AMC 6.13 the ICAO Fatigue Risk Management Guide is referenced. We will be exploring adaptation of the ICAO FRMS Guide to be appropriate for business aviation operations and if that is accomplished, it will receive more prominence in the AMC.	Concur
6.14.1 - Travel Health Issues	It was suggested that an AMC be added for this requirement as the GCOM does not have an overly elaborate example of a procedure.	The web sites identified in 6.14.1 and in the GCOM provide current information on traveller health issues. This information is subject to change and update so it would be most appropriate to have operators check the web site for the most current info rather than to try to duplicate it. Consequently, it is recommended that this suggestion not be accepted.	Accepted
6.17 - Microphones	It was noted that this seems to be a prescriptive element and to belong more in an SOP, rather than in a standard as a discrete item. If it is in here, then why isn't a requirement for Sterile Flight Deck procedures here? This is the prescription/ needs- based argument again.	This is a standard in Annex 6 Part II para 3.6.12 that has been incorporated into the IS-BAO. Consequently, no further action is recommended.	Accepted
7.2.1 – Compliance with national and regional rules	It was commented that it is not possible, reasonable or enforceable for an operator to meet <u>all</u> "regulations of each State", such as variations in aircraft emergency equipment required (crash axe or no crash axe, what size, etc). It was suggested that the requirement should only apply to operational/ airspace rules, such as RVSM contingency differences, etc.	This requirement is intended to reflect the ICAO Annex 6 Part II para 3.3.1. To add more specificity the phrase " <i>as are pertinent to the performance of their respective duties in the operation of the aeroplane</i> " has been added to the end of 7.2.1. This phrase is included in the ICAO SARP.	Concur

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8.6.1 Flights over Water	It was noted that the note delineator “1” should be in superscript.	This is a typographical error – it has been corrected	Concur
8.12.2 ACAS II	It was noted that there is a “t” missing in “turbine”.	This is a typographical error – it has been corrected	Concur
9.1.3.k – Tool and material control	It was suggested that this requirement should probably be divided into two sections as tool and materials controls are two separate functions. Tools are typically controlled in one fashion and materials are controlled in a different fashion with different procedures. This standard is also confused with parts control and shipping and receiving functions. (Standard 9.1.3 (f))	Section 9.1.3.k primarily refers to tool control, centring on the principle of not leaving anything in the aircraft that is not supposed to be there when maintenance is completed. Material control is addressed by 9.1.3.f. Therefore, 9.1.k (now re-numbered as 9.1.l) and section 10 of AMC 9.1 have been modified accordingly.	Concur
9.1 or 9.2 – Maintenance Control System	It has been suggested that a new standard be added: “Does the operator have a procedure for ensuring compliance with applicable State regulations when maintenance is performed by an outside organization?”	Standards 9.1.4, 9.1.5 & 9.2.1 address related issues. Consequently, it is recommended that this suggestion not be accepted.	Accepted
9.1.9.d (re-numbered as 9.1.11.d) – Condition monitoring	An auditor noted that some operators do not understand condition monitoring and reliability programs.	For US operators the issue is addressed in AC120-17. It is accepted that these are complex programs and if operators do not understand the concepts they obviously are not involved in such programs. FAA AC 120-17 contains a good explanation, so, a Note has been added referring to this AC.	Concur
10.1.g and k – Ops manual	A commenter asked “what do these mean?” Normal flight/ Emergency operations requirements or procedures?	The list of ops manual requirements in 10.1 reflect the requirements stated in Attachment 3.A of Annex 6 Part II. The “normal flight operations” is intended to include the normal operating requirements and procedures and the “emergency operations” includes the emergency equipment and operating procedures”. It was considered reasonable to expand the wording and be more specific.	Concur
10.1.j – Ops manual	It was suggested that as noted in the 6.13.1 comment regarding fatigue risk management, this line should be added to or modified.	In keeping with the amendment to 6.13 the item has been changed to “fatigue management system”.	Concur
12.2 – Environmental Management	An auditor said “this standard is hard to answer and indicated that while he believed he knew what the standard is getting at, most operators don’t know how to answer the question or put guidance in their operations manual. He therefore suggest that this recommended procedure be reviewed for clarity and possibly be rewritten.”	Operator should ensure that they are in compliance with local environmental policies (fuel spill containment, waste water, de-ice fluid capture, noise, etc. Most jurisdictions have an environmental protection agency and most airports have an environmental plan that the operator could/should harmonize with. As for other destinations, it may be prudent for the operator to research frequently visited locations to determine if there are any special environmental policies or procedures. These	Concur

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		questions could be combined with other typical questions such as: policies for towing, policies for fuelling, etc. Therefore, a Note containing the above info was added to 12.2.	
13.0 – Occupational Health and Safety	It has been noted that some operators with no owned or leased work space do not understand that they have occupational health and safety responsibilities. Therefore it has been recommended that all operators be required to provide their employees with applicable OSHA training and ensure that other company personnel comply with the operator’s occupational health and safety procedures.	This concern has been raised in several audit reports, therefore standard 13.1 has been modified and a new provision added as 13.2.	Concur
AMC 3.2 - Safety Management System	It was suggested that information on the NBAA Safety Committee Safety Culture Video that should be available as an on-line product for NBAA Members by August/September 2011 be added	A link to the NBAA Safety Culture video was added.	Concur
AMC 6.1 -Training Programs	It has been suggested that a link to the FAA AC 120.71A on SOP development be added.	This reference has been included.	Concur
AMC 6.13 - Fatigue Risk Management	It has been suggested to add the IATA FRMS and other ICAO material to the Fatigue reference in AMC	This reference has been included.	Concur
Appendix D - Terminology	The definitions of “ process ” and “ procedure ” are included in the Audit Procedure Manual but not in the IS-BAO. It may be wise to include them and the definitions of “ system ” and “ program ” into the IS-BAO.	The definitions were added	Concur

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APM Reference	Comments and Issues	Analysis and Proposed Action
2.4.1	The information on the IS-BAO Standard Board decisions and the distribution of amendments is not current.	Section 2.4.1 has been updated.
3.9.2 (re-numbered 3.10.2) Transparency and disclosure	Review of audit reports and operator issues has indicated that there is a need to reinforce the info on Transparency and Disclosure of audit reports – and ensure that auditors understand that separate reports with different information are forbidden.	This is considered a localized but significant issue. Therefore, additional text has been added to the section that has been re-numbered.
3.10 – (re-numbered as 3.11) Conflict of Interest	An auditor asked if this meant that if a firm prepares an operator for an audit, they then cannot provide another auditor (from their firm) to validate? He went on to state that he thought that the understanding out in the field is that a firm CAN prepare an operator and provide a separate auditor to validate. He suggested that if this is not the intent, then the section should be revised.	This section was carefully drafted to address this issue. This is an auditor liability issue and not a requirement. When Enron collapsed, the primary casualty was Arthur Anderson LLP. http://en.wikipedia.org/wiki/Arthur_Anderson http://knol.google.com/k/bali-sunset/s-illegal-involvement/148pgo7119vi8 was brought about by them being conflicted in their interest in that they provided both compliance and financial auditing to Enron. However, it is recognized that the current section has the potential to impact the IS-BAO program. The reason why the section was drafted as is. As a result, it is accepted that the second sentence should be revised to clarify it. It also would require auditors who may be in a conflict to obtain prior approval for the audit from the Audit Manager and to disclose in the report the potential conflict of interest.
5.8 – SMS Evaluation	An auditor suggested that a different set of standards be developed for Stage 2 and Stage 3 operators.	The maturity stages refer to the operator's performance and not to other IS-BAO requirements. It is suspected that the auditor is referring to the SMS Evaluation questions in chapter 5.8 of the Audit Procedures Manual. As noted in the manual, these evaluation questions are intended for operators to develop their own compliance evaluation. Additional wording has been added to section 5.8.1 to re-enforce this.
8.0 – IS-BAO Audit Protocols	An operator noted that the GCOM and other documents are designed with an MS Word “style set” that provides for the table of contents and document map features to be utilized. The current Audit Protocol document is not designed with such features. I suggest simply adding a “style” from the “styles” menu to each section and subsection of the document to provide for simple navigation instead of having to scroll through several pages to locate certain items. This will save valuable time and significantly decrease the workload of the document user.	The audit protocols have been included in the Contents of the Audit Procedures Manual. The table of contents will also be included in the final document.
8.0 – IS-BAO Audit Protocols	It was suggested that the audit protocols be revised to emphasize that evidence should be listed within the protocol section cited and then the actual finding at the end of the chapter. Suggestions/recommendations could be displayed similarly. Also consider changing the Summary of Findings section	A failing of some auditors is to simply list non-conformities as Findings with no related to the underlying cause(s) of the non-compliance. Accordingly, it is proposed to accept the finding as a recommendation and modify the audit protocol accordingly, plus make a related change to the

Issues for 2012 APM Revision

APM Reference	Comments and Issues	Analysis and Proposed Action
	to Analysis of Non-conformities and Findings sections or something like that.	4.7.2.
8.0 – IS-BAO Audit Protocols	An auditor suggested that the audit protocols be changed to landscape format. He noted that several auditors have reformatted the protocols to incorporate this feature. It may even reduce the number of pages.	While landscape format would work on documents it could be problematic in a digital version. Accordingly it is recommended that the format of the audit protocols in the APM Manual not be changed but that the protocols provided in both portrait and landscape format. Auditors may then use the format of their choice.
8.3 - Audit Finding Form	It has been suggested that the Audit Finding Form be re-format into a table format in order to facilitate multiple Findings on a single form.	While this may streamline the completion of the Form it must be noted that one common complaint is that auditors do not do any analysis of Non-conformities but instead simply copy them as Findings. Looking for the cause(s) of the problem in a table format as suggested could exacerbate this. Therefore, it is recommended that this suggestion not be accepted.
8.4 - Audit Report Form	The audit review committee have expressed concern that some auditors do not adhere to all current IS-BAO audit requirements. Therefore, it has been suggested that a Note be added at bottom of page two of the audit report form stating, "**Ensure that all current IS-BAO policies have been complied with" or, a statement be included above the auditor signature on page one of the report form stating, "This report complies with current IS-BAO policies and standards"	While the number of such instances is small, it is agreed that such a reminder is in order. It would appear that the two suggestions are complementary so it is proposed to accept both suggestions in the Audit Report Form.