

Section	Issue	Analysis / Standards Board Decision
3.2.1.c	Note 3 may be perceived as prescriptive.	Change the term "would" to "could".
3.2.1.d	<ol style="list-style-type: none"> 1. After removal of Chapter 11 in 2016, there is no mention in the standard to the need to maintain a documented ERP; 2. It does not seem appropriate to wait until Stage 2 to require the ERP to be tested - testing should be moved from note 2 to note 1; 3. In note 2, the term applied does not seem to clearly convey the intent of the item (improvement of the ERP as a result of tests conducted). 	<ol style="list-style-type: none"> 1. Adapt standard to include a mention to the fact that the operator must maintain a documented ERP; 2. Remove first item of note 1 ("the ERP should be regularly tested") and include that into the first item in note 2 ("the ERP should be regularly reviewed, tested and updated"); 3. Change "applied" to "used to improve the ERP" in note 2.
3.2.2.a	<ol style="list-style-type: none"> 1. The note of the SRP lacks clarity in addressing the intent of the SRP; 2. Note 1 refers to external reports, however many operators use external sources of safety information that do not necessarily constitute reports; 3. In note 2, the term throughout does not seem to clearly convey the intent of the item (hazards identified and reported from all areas of the organization). 	<ol style="list-style-type: none"> 1. Modify the note related to the SRP to indicate its purpose; 2. Include the term "sources" to the end of note 1 ("external reports/sources"); 3. Change "throughout" to "from all areas of" in note 2.
3.2.2.b	The use of the term Ops Manual seems inappropriate for the Standard.	Replace "Ops Manual" with "Operations Manual".
3.2.3.a	<ol style="list-style-type: none"> 1. Current appropriateness and effectiveness questions are somewhat repetitive; 2. SPIs are extensively explored, however the establishment of SPTs and verification of SPIs against SPTs are not addressed; 3. Item 1 of note 2 requires that SPIs trend toward safety targets, which is desirable but not always possible, and should not be non-conforming if the operator identifies this condition and acts upon it. 	<ol style="list-style-type: none"> 1. Rewrite item 1 of note 1 for clarity; 2. Remove SPI trend calculation from Note 1; 3. Include item in note 1 to clarify that operators must determine appropriate SPTs; 4. Remove item 1 of note 2; 5. Rewrite note 2 to clarify that SPI data must be analyzed over time and against corresponding targets, and that decisions must be made based on this analysis.
3.2.4.a	Note 1 does not specify that it refers to SMS training.	1. Include "SMS" in note 1 ("SMS training").
3.3.1	<ol style="list-style-type: none"> 1. Numbering of the item is not standardized with the rest of the document; 2. Compliance monitoring should be exercised by all operators, but the note to this standard may be interpreted otherwise. 	<ol style="list-style-type: none"> 1. Add numbering 3.3.1; 2. Remove note 1.

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3.3.2	Many operators fail to download the IS-BAO each year and incorporate processes/procedures to conform with the modifications to the standard.	Add a specific requirement for a process to incorporate processes/procedures according to the changes to the IS-BAO standard as applicable.
3.4.1	1. Numbering of the item is not standardized with the rest of the document; 2. In Note 1, C-FOQA is a specific term and a brand, general terms accepted in the industry should be used instead; 3. Note 2 includes a link to external documents, which may become broken if the address of the document changes.	1. Add numbering 3.4.1; 2. Adjust note 1 to use general terms appropriate internationally; 3. Remove the link to external documents.
4.7	Numbering of the item is not standardized with the rest of the document.	Add numbering - 4.7.1.
5.1.3.c	1) Many operators fail to provide training to cabin servers. It seems current wording is not clear on this requirement; 2) Also, HEMS is a term tied to RW operations, but medical teams may be used in FW operations as well.	1) Clarify applicability of this item to "cabin attendants" or "cabin servers"; 2) Change "HEMS medical teams" to "EMS medical teams".
5.4.1	Item includes one requirement for flight crew members and a recommended practice for other crew members in a single item.	Remove the recommended practice from item 5.4.1 and add item 5.4.1.1 to accommodate it.
6.2.2	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.2.1.
6.2.3.1	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.3.1.
6.2.5.1-6	Numbering of the item does not indicate the applicability for aeroplanes according to the standard used in the rest of the document ("A" suffix).	Change numbering to 6.2.5.1A/2A/3A/4A/5A/6A.
6.2.5.1-3	Numbering of the item does not indicate the applicability for helicopter according to the standard used in the rest of the document ("H" suffix).	Change numbering to 6.2.5.1H/2H/3H.
6.2.6	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.6.1.
6.2.7A	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.7.1A.
6.2.9	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.9.1.

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6.2.10	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.2.10.1.
6.16	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.16.1.
6.17	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.17.1.
6.18A	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.18.1A.
6.19.1/2	Numbering of the item does not indicate the applicability for helicopter according to the standard used in the rest of the document ("H" suffix).	Change numbering to 6.19.1H/2H.
6.20	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.20.1.
6.21	Numbering of the item is not standardized with the rest of the document.	Add numbering - 6.21.1.
8.6.2	Standard includes more than one aspect to be assessed into a single item, leading to discrepancies between the standard and the protocols.	Divide the item into 2 sub-items (a/b).
9.1.2	<p>1. Standard includes more than one aspect to be assessed into a single item, leading to discrepancies between the standard and the protocols;</p> <p>2. The term "maintenance organization" is not accurate as in many cases the organizations approved by the NAAs are not actual maintenance organizations;</p> <p>3. It may not be clear to some operators why they need to ensure oversight of contracted organizations.</p>	<p>1. Divide the item into 2 sub-items (a/b);</p> <p>2. Replace the term "maintenance organization" by "organization";</p> <p>3. Include, in the note, a reference to the owner's/operator's responsibility for ensuring the airworthiness of the aircraft.</p>
10.1	Standard refers to several processes in a single item, leading to discrepancies between the standard and the protocols.	Restructure the item into 3 different items - 10.1, 10.1.1 and 10.1.2 - , targeted at each of the required processes, for clarity.
11.1	Item causes confusion among operators as it recommends a FRMP for all personnel, to include personnel not related to flight operations.	Remove the recommended practice.

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11.2	1. Although the term fatigue management program is used throughout the standard, this item refers to the elements that must be included in the "system"; 2. The standard is not clear on whether recurrent training on fatigue is required; 3. Item d is not clear on what personnel it refers to.	1. Change the term "system" to "program"; 2. Add reference to appropriate "initial and recurrent" training; 3. Include in item d more information on what personnel it refers to. Remove these details from the main item of the standard to reduce repetition.
15.2	Standard includes more than one aspect to be assessed into a single item, leading to discrepancies between the standard and the protocols.	Divide the item into 4 sub-items (a/b/c/d).
Overall	Minor grammar, spelling or punctuation errors throughout the Standard.	Perform an overall grammar review in the Standard.