Part 145

EASA NPA 2013-01 Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003

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Who is ASA?

Founded in 1993, ASA represents the aviation parts distribution industry, and has become known as an organization that fights for safety in the aviation marketplace.

ASA and ASA's members are committed to safety and seek to give input to the Agencies tasked with regulating aviation safety regarding government policies so that the aviation industry and the government can work collaboratively to create the best possible guidance for the industry and the flying public.

ASA supports efforts to increase safety. ASA has a number of programs to support aviation safety, and ASA works with the FAA, EASA, and other non-US regulatory authorities to develop and maintain programs designed to support safety as it relates to distribution, maintenance and installation of aircraft parts.

ASA's membership is comprised of a large cross-section of the parts distribution community. Additionally, about 25% of ASA's members hold repair station certificates. Many more of ASA's members use repair stations in order to overhaul or repair aircraft parts intended for sale to the aviation aftermarket. ASA's members are committed to safety and take the implementation of SMS very seriously.

ASA's members are typically small businesses. Most of them employ between 2 and 20 employees.

ASA appreciates the opportunity to provide feedback regarding EASA NPA 2013-01 Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003.

Comments

General Comments

The Aviation Suppliers Association understands that EASA is introducing, as promoted by ICAO, a new approach to safety in the form of SMS. The implementation of SMS is a challenge that the global aviation industry faces together, and must be proactive in addressing. However there are disadvantages to introducing such a comprehensive change of direction as is contemplated by 145.A.65 "Management System." ASA believes that the overwhelming scope of this rule will make implementation of SMS unnecessarily difficult and costly, as well as

compromise safety as resources committed to current safety programs are directed to the full-scale implementation of SMS.

Typically, when new regulations are introduced, they are introduced incrementally, rather than wholly developed. This gives industry an opportunity to determine the best ways to implement the individual rules without an overall reduction in safety. Industry has an opportunity to work with the relevant agencies to determine the best way to address the proposals and to work out any unanticipated challenges. Industry is also able to narrowly target its resources at the required changes. This permits the adoption of new regulations without a substantial reallocation of resources away from the bulk of the quality system. It is important to note that existing quality systems have an exemplary history of safety.

Under the proposed approach, industry will not have an opportunity to determine what is practicable and effective on a gradual basis. Instead, industry will receive an entirely new mandate all at one time, without the opportunity to individually test and adopted best practices for each element of SMS.

We feel that the introduction of SMS would be more effective, and create less of a risk to safety, if it were introduced gradually. The most important consideration is, and must always be, the safety of the flying public. By introducing a complete change of focus in transitioning to SMS, organizations will be forced to allocate their resources to the creation and adoption of an entirely new management system. They will also be required to do this while maintaining their current quality programs to ensure the safety of the public. This presents an unreasonable burden. We fear that the cost and resource burden of switching to this new system, and the unintended consequences to the existing--and highly effective--quality system, has not been fully taken into account. Organizations have a finite amount of resources. When those resources are allocated to new initiatives, the necessarily are taken away from other proven and adopted programs that contribute to aviation safety. It is critical that scarce resources are dedicated to the most important safety priorities first.

We also believe the full-scale implementation of SMS could disruptive and costly to the industry with very little real short-term benefit. Although SMS is the direction the aviation industry is heading, a more gradual implementation of SMS may both avoid the costly, and potentially dangerous, disruption to industry, as well as allow for a more thorough, industry-tested approach to SMS.

It also appears that the AMCs are now essentially binding. Notwithstanding the "general principle of AMC being non-binding," the requirement to ask for formal approval to differentiate from the AMC makes them de facto regulations. This appears contrary to the nature of AMC historically.

AMC have traditionally be considered advisory in nature. If the AMC are now to become compulsory, the must be a new NPA to address all previously-approved AMC language. Industry and other stakeholders participating the rulemaking process offered their comments to AMC in previous NPAs based on the assumption that those AMC were advisory only--not compulsory. If the AMC are now considered compulsory--or require formal approval for deviation from the AMC--then stakeholders must be given an opportunity to comment on those AMC that they will be required to adhere to. As a practical matter, requiring approval to use an alternate means of compliance rather than the AMC renders the AMC binding. Additionally, the requirement that a risk-assessment be performed that "demonstrate[s] that an equivalent level of safety to that established in the AMC" (AMC1 145.A.82) leaves a determination of safety at the sole discretion of the Agency. Under an SMS program, the organization should be able to make such a determination as part of its risk analysis and hazard reduction strategy.

Human Factors

The NPA proposes sweeping changes to Part 145, as well as the inclusion of a significant new segment of SMS provisions. Because substantial changes are already being made, it may be helpful to delay the inclusion of non-core SMS features such as Human Factors.

Human Factors is not intrinsically a part of SMS. Before an increased emphasis on human factors is required, there is a significant need to ensure that the rules take a risk-based approach that is calculated to reduce hazards. Many organizations that undertake risk-based hazard analyses may discover that human factors are low risk or present a low hazard. For these organizations, requiring a focus on human factors will allocate resources away from more critical hazards. Risk management resources are finite; where factors do not help to improve safety via identifying risks and reducing hazards they should be disregarded in favor of those activities and programs that do have a tangible effect on safety.

Although a focus on human factors may be necessary in the future, given the nature and expanse of this NPA it seems reasonable to refrain from promulgating human factors regulations in addition to the additional changes to Part 145 and the inclusion of new SMS requirements. Industry already faces a large challenge in implementing the proposed changes; that burden should be moderated to the extent possible in order to ensure an orderly transition.

AMC1 145.A.10 Scope

Provision 1.(b) would require “an appropriate risk assessment [be] carried out” prior to acceptance of base maintenance tasks that are temporary or occasional (such as ADs and SBs).

This appears overly burdensome given the extent of analysis contemplated in the Guidance Material (see GM3 145.A.65(a)(3)(e)), as well as unnecessary under a comprehensive SMS program.

Case-by-case risk assessments of base maintenance tasks are unnecessary under SMS and therefore the clause should be removed from this AMC. Per 145.A.65, an appropriately designed system will contemplate the hazards entailed by the activities of the organization and will ensure the personnel are competent to perform the task. Case by case assessments are therefore redundant. Additionally, resources are not infinite; more time spent performing analyses means that less time is allocated to performing the actual tasks that add value and safety.

AMC1 145.A.30(b) Personnel Requirements

Provision 2 introduces two additional management positions to address the requirements of SMS. Such requirements tend to interfere with the inner workings of organizations and usurp the business's prerogative in creating and staffing managerial roles.

Notwithstanding the importance of ensuring managerial competence with respect to oversight of an organization's SMS, decisions regarding such personnel—and their ability to fill multiple roles—should be left to the discretion of the organization. Such additional personnel requirements may also create an undue financial burden on businesses causing resources to be allocated away from other safety programs.

145.A.42 Acceptance of Components

Implementing Regulation 145.A.42(a) begins: "no component may be fitted unless . . . ." This language has the unintended potential to create the need for exponentially more Form 1s because the language can be interpreted to require each discrete component to require a Form 1. For instance, in the case of an engine overhaul, it may be read to require each blade on a given disc have a unique Form 1, the disc itself to have a Form 1, and so. The intent of the rule is clearly not to create an additional paperwork burden, but to ensure the airworthiness of components before they are fitted to an aircraft.

We recommend inserting the phrase "to an aircraft" after the word "fitted" to better clarify the regulation. The new language would read: "no component may be fitted *to an aircraft* unless . . . ." Such a revision captures the intent of the regulation to ensure the safety of each component, without necessitating the burden of including a Form 1 for each discrete component contained within a larger component.

145.A.42(a) also requires all components to be "appropriately released to service on an EASA Form 1 or equivalent." Subparagraph (b) then describes six categories of components for which a Form 1 would be required. Among those are the parts described in sub-subparagraphs (b)4 and (b)5: standard parts and raw and consumable materials. Historically, however, as well as within the AMC to 145.A.42, these parts are not eligible for a Form 1. The language of the provision therefore requires standard parts and raw and consumable materials to be issued a Form 1 for which they are not eligible under the regulations. There is no regulatory relief from the requirements of subparagraph (a) described in the regulation.

In order to clarify the components that require a Form 1 under the regulation, and exemption from the Form 1 requirement must be spelled out in the IR itself, rather than in the advisory language (e.g., AMC1 145.A.42(g), AMC1 145.A.42(h)). Subparagraph (a) concludes by allowing exceptions for components "otherwise specified [in Subpart Q], or in this Regulation." The exception to the Form 1 requirement for standard parts and materials should be written into the Regulation itself. We suggest inserting language in IR 145.A.42 stating that an EASA Form 1 is not required for standard parts, or raw or consumable materials.

The requirement that a Form 1 be issued for standard parts also creates an uneven playing field between TC holders and parts distributors, essentially making TC holders the only persons who can sell standard parts. This is due to the fact that distributors are not able to obtain an EASA Form 1 (or FAA 8130-3 tag) for standard parts. TC holders, on the other hand, would be able to designate a standard part in their manuals and obtain a Form 1 with respect to those parts (see AMC1 145.A.42(g)(a)). This essentially creates an oligopoly over standard parts in the aviation industry among TC holders as they are the only parties who can obtain the regulatorily required (but not issuable) Form 1.

The first sentence of provision (b)6.(v) states that "standard parts shall only be fitted to an aircraft or a component when the maintenance data specifies the *particular* standard part." In this context, the word "particular" is meant to refer to a specific standard part by nomenclature (ensuring that the standard part, regardless of manufacturer, complies with an international standard). It has become practice, however, for certain maintenance data to call out standard parts by manufacturer, rather than nomenclature. In such a scenario, a literal reading of (b)g.(v) would preclude all other standard parts not made by the manufacturer called out in the maintenance data. This possibility is contrary to the purpose of standard parts. Additionally, as a matter of common practice, standard parts are frequently combined and stored in the same bin, without regard to the many manufacturers, due to the standardized nature of the parts.

We recommend that that wording of the first sentence be clarified to explain that "particular standard part" is a reference to the part by nomenclature, and not a reference to a particular manufacturer.

Provision (b)6.(v) also states that “standard parts shall only be fitted when accompanied by evidence of conformity *traceable* to the applicable standard.” The inclusion of the word traceable is likely to cause confusion with the concept of traceability.

A number of requirements address traceability of components. This provision deals only with the use of standard parts called out in maintenance data. Use of the word “traceable” may cause confusion and lead to demands for traceability documentation. We suggest the sentence be edited to read “standard parts shall only be fitted when accompanied by evidence of conformity to the applicable standard.” This more clearly conveys the requirement that standard parts meet an applicable international standard.

Subsubparagraph (b)6.(vi) states that "material shall only be used when the material meets the required specification" described in the maintenance data. This creates a conflict with a large number of existing maintenance manuals that call out raw or consumable materials without a reference to a specification. An example of this would be a maintenance manual requiring the use of "sheet metal" but not calling out any particular specification. This provision must be reviewed in light of the number of currently approved manuals that call out raw materials only without reference to a required specification.

AMC1 145.A.42(a) Acceptance of Components

AMC1 145.A.42(a) subparagraph (c) contains a list of typical checks to be performed regarding components. These descriptions should be deleted or clarified, as a number of them are not generally applicable, and have the potential to be misapplied.

Subsubparagraph (c)(2) states that the shelf life of a component should be verified. Although it seems self-evident that this should only apply to those components that are shelf-life limited, there have been previous instances of vaguely worded regulations leading persons to request expiration information about components that are not shelf-life limited. For advisory materials such as these, it is important to be precise; we recommend inserting the following language (in *italics*): "*in the case of shelf-life limited components* verification of that shelf life of the component has not expired."

Subsubparagraph (c)(3) states that verification should be made that "items are received in the appropriate package in respect of the type of component." There are, however, no packaging

requirements in the regulations themselves, and therefore no regulatory requirements or metrics against which to measure the propriety of any given packaging. This advisory material should be omitted because there is no objective way to comply under the current regulations.

Subsubparagrpah (c)(4) requires verification that a component "has all plugs and caps appropriately installed." This provision is intended to apply to hydraulic and fuel units as demonstrated by the second sentence of the provision, but can easily be misconstrued to apply to any component that has electrical connections or fluid fittings or openings. The provision should be clarified to indicate that it applies only to hydraulic or fuel units.

AMC1 145.A.42(g) Acceptance of Components – STANDARD PARTS

Provision (c) states that a Form 1 is “not normally issued” and therefore should not be expected. In certain cases, parties have become confused as to whether a Form 1 or equivalent was required or allowed under the regulations. Although these manufacturer-specified standards parts from European Type Designs are not eligible for an EASA Form 1, the bilateral agreement between the United States and EU requires that such parts be accompanied by a Form 1. This requirement is found in the Technical Implementation Procedures (TIP) to the BASA.

Although subparagraph (c) takes steps to address the confusion regarding whether a Form 1 is required for Standard Parts the language should be made clear to explain that standard parts do not require a Form 1, however a Form 1 may be issued to satisfy the requirement under the US-EU BASA TIP.

Subparagraph (a) states that a TC holder may make reference to a national or international specification "not being an aviation only specification for the particular part." The inclusion of this language is confusing because it appears to preclude the reference by a TC holder to an aviation-only standard, for instance the commonly referenced AIA National Aerospace Standards. The AIA NAS is a commonly referenced standard in Type Designs and is a widely accepted specification for Standard Parts.

We recommend deleting the phrase "not being an aviation only specification for the particular part" from subparagraph (a) to make clear that reference to aviation-only specifications such as AIA NAS is permissible.

145.A.43 Control of unserviceable components

Provision (a) addresses “unserviceable” components; however the term appears to refer to components that are not currently airworthy rather than components that cannot be made to be airworthy (which appears to be described as “unsalvageable”).

This is likely to cause confusion. The root-word “serviceable” in this case appears to mean “fit for service on an aircraft.” However, the word also can be interpreted as meaning “able to be repaired.”

The provisions should be clarified to explain the difference between an unserviceable and unsalvageable parts. In the case of a part that can be made airworthy, the term unserviceable appears inappropriate. We suggest a term such as “not airworthy” or similar to describe all parts other than those deemed unsalvageable.

AMC1 145.A.43(c) appears to contemplate this distinction by describing components to be classified as “unsalvageable” and includes components that cannot be returned to an airworthy condition.

AMC1 145.A.43(c)(2) Control of Unserviceable Components

Provision (d) appears to include an overly burdensome and potentially unworkable requirement. It would require that an organization that mutilates or destroys a component provide the manufacturer with the data plate or serial number and disposition of the component.

This appears to be an overly burdensome record keeping requirement, particularly for organizations that may be destroying large quantities of components as part of their business model. Such organizations may not have the ability to document each serialized item that is slated for mutilation or other form of disposition.

The requirement may also be impracticable in situations in which the original manufacturer has gone out of business. This creates a record-keeping double standard for documentation of end-of-life components.

We suggest that this notification to manufacturer requirement be deleted.

145.A.48 Performance of maintenance

Provision (b) requires an independent inspection be carried out after any flight safety sensitive maintenance task is performed. This requirement seems overly burdensome as well as inefficient.

The requirement that an independent inspection be obtained after each flight safety sensitive task is overly burdensome in that multiple inspections are required even for common maintenance (see AMC1 145.A.48(b)). An additional inspection beyond the authorized individual signing the maintenance release could prove incredibly costly, particularly to smaller organizations.

The additional inspection is also inefficient in that it diverts resources that could otherwise be spent performing inspections on other completed maintenance, or providing a second inspection for maintenance that is particularly unique or in need of additional review. Safety resources are not finite, and any resources that are diverted to non-value add activities necessarily divert resources from other vital safety and quality activities.

We suggest that the requirement for duplicative independent inspections be eliminated, or limited to non-routine or otherwise unique maintenance.

AMC1 145.A.65(a)(1) Management system — ORGANISATION AND ACCOUNTABILITIES

Provision (c) requires that each organization establish a safety review board. Such a board both appears to significantly overlap with the duties of the safety action group provided for in GM2 145.A.65(a)(1) but also misallocates resources that could otherwise be spent performing actual safety tasks. The dedication of finite safety resources spent on matters other that do not directly contribute to safety and quality assurance may in fact result in diminished, rather than increased, safety.

The creation of a safety review board is an inefficient use of resources that could otherwise be targeted at important safety initiatives. As part of a fully integrated SMS, strategic safety policy is already created and supported by each organization (see 145.A.65).

The self-monitoring nature of SMS provides for ongoing analysis of risk and revision of policy if necessary, making a safety review board a redundant requirement. Additionally, the safety action groups provide first hand monitoring of safety performance and are uniquely suited to advise management accordingly with respect to modification of safety initiatives and achievement of objectives.

Finally, the creation of the board draws resources away from actual safety assessment and monitoring. With limited resources for the development, implementation, and execution of SMS, it is important to efficiently apply resources to areas that have the strongest effect on safety.

We suggest eliminating the safety review board requirement.

AMC1 145.A.65(a)(2) Management system — SAFETY POLICY

This AMC articulates in significant detail elements that are to be included in the Safety Policy.

SMS requires ongoing self-evaluation and risk assessment to be performed by the organization. Because every organization differs in structure, personality, and culture, it is difficult to draft a one-size-fits-all solution to what should be included in a safety--or any other--policy. The proposed AMC provides substantial detail with respect to the content and structure of an organization's internal safety policy; this detail should be left to the individual organizations.

Examples of ideas to be included in safety policy are helpful. However, requiring specific elements to be included in safety policy borders on micromanagement of individual organizations. The regulations should provide flexibility for organizations to develop a safety policy that takes into account the structure, culture, and daily realities of the organization.

We suggest that the AMC make clear that it is only advisory, and that there are innumerable factors that a proper safety policy might include. Cf. GM1 145.A.65(a)(2).

AMC1 145.A.65(a)(3) Management system — SAFETY MANAGEMENT KEY PROCESSES

Provision (a)(2) of the AMC appears impracticable and excessively burdensome.

The provision of a confidential reporting system is a valuable safety provision; however it does not seem practicable that anonymity can be maintained if feedback is required. Individual feedback would obviously draw back the veil of anonymity. On the other hand, broadcasting feedback to the entire organization may risk exposing the informant or require the release of need-to-know information throughout the organization.

Developing layers of a system for carrying on anonymous discourse seems costly and beyond the scope of the organizations' missions. Organizations have finite resources to dedicate to quality and safety. Allocating resources to responding to confidential disclosures draws those resources away from addressing the actual content of the disclosure, as well as other important safety and quality initiatives.

Provision (a)(3) emphasizes focus on hazards from (1) human factors and (2) complex subcontract arrangements. It ignores the important aspect of quality management and risks sacrificing this important safety element.

Human factors are not traditionally regarded as an element of a safety management system. SMS is a method to identify hazards and control risks in a systemic manner. Such systems should reduce risk to as low a level as possible, regardless of human factors. It is for this reason that human factors issues should not be included in an SMS rulemaking.

Additionally, by ignoring entirely the quality assurance aspect with which organizations are very familiar, and instead emphasizing human factors and subcontractor arrangements, the regulation risks a too-rapid shift away from what has heretofore been the focus of most safety regimes. Provision (a)(3) should emphasize that quality still plays a role in the management of safety. A rapid shift away from the current effective system to a new system also risks spreading too thin resources dedicated to safety. Making a sweeping transition from quality to SMS risks jeopardizing safety in the name of a rapid transition.

ASA suggests including language emphasizing a focus on a meticulous, resource-conserving transition from a QA system to an SMS system. In the alternative, we suggest implementing the new regulations on a graduated time scale in order to allow effective implementation, without compromising existing safety programs.

Provisions (d) and (f) emphasize the ongoing on-going monitoring and evaluating of safety performance. The requirements appear burdensome and a significant drain on resources that would be better suited to actual safety activities.

It is admittedly important to periodically review performance with respect to safety objectives and to evaluate the system and performance to determine opportunities for improvement. However, in this case the requirements include ongoing reporting, safety reviews and analysis, audits, surveys of productivity and personnel, evaluations of facilities, equipment, documentation and procedures through audits and surveys, evaluation of individuals, evaluation of the system, and annual reviews of the system.

Such ongoing auditing and review has a diminishing rate of return. Although periodic audits and reports reveal deviations from the norm, constant evaluation risks subtle deviations going unnoticed while producing a cumulative result. Additionally, constant monitoring draws resources away from the actual objective of safety management and risk mitigation by allocating human and financial resources to audits and surveys. Organizations have a finite amount of resources; those resources are most appropriately directed toward initiatives that directly contribute to safety and quality assurance.

ASA suggests the provisions require only periodic review, rather than ongoing review, of systems. This does not diminish the opportunity for employee self-reporting, which should be encourage under a safety system.

145.A.65(a)(3) Management system — SAFETY RISK MANAGEMENT — (a) Purpose

Provision (d) provides four risk acceptance criteria to be addressed. These are (1) third parties; (2) maintenance personnel; (3) the natural environment; and (4) corporate well-being. The latter two criteria appear likely to draw attention and resources away from the key objective of managing safety.

Third parties and maintenance personnel are key elements of any risk management system. Third parties in the form of subcontractors or suppliers will frequently have an effect on safety; maintenance personnel have an obvious and direct effect on safety.

GM3 145.A.65(a)(3) is described as intended for organizations with little or no experience in safety risk assessment. The inclusion of factors such as the environment and corporate well-being are likely to distract such a company from the very tangible risks associated with third parties and maintenance personnel. Additionally, environmental factors can be managed by maintenance personnel functioning under an appropriate safety management system.

The primary objective of the system is to improve safety. When faced with an organization learning the fundamentals of risk assessment, it is important to address primary areas of risk initially—those with a direct and tangible effect on aviation safety—and allow for expansion and development of non-primary risk assessment as the organization matures.

145.A.82 Means of compliance

New IR 145.A.82 "Means of compliance" effectively renders all AMC compulsory. Notwithstanding the general principle of AMC being non-binding, and the use of the permissive "may" in subparagraph (a), the requirement to ask for formal approval to differentiate from the AMC makes them de facto regulations. (See 145.A.82(b)). This appears contrary to the nature of AMC historically.

AMC have traditionally been considered advisory in nature. If the AMC are now to become compulsory, there must be a new NPA to address all previously-approved AMC language. Industry and other stakeholders participating in the rulemaking process offered their comments to AMC in previous NPAs based on the assumption that those AMC were advisory only--not

compulsory. If the AMC are now considered compulsory--or require formal approval for deviation from the AMC--then stakeholders must be given an opportunity to comment on those AMC that they will be required to adhere to. As a practical matter, requiring prior approval to use an alternate means of compliance rather than the AMC renders the AMC binding.

We suggest eliminating the requirement that prior approval be obtained before implementing an alternate means of compliance. This would enable organizations to determine the best method of compliance with the regulations to fit their individual company while still requiring the organizations meet a minimum standard. It is also in line with the historical role of AMC in demonstrating one, but not the only, method of compliance with a regulation.

AMC1 145.A.82 Means of compliance — DEMONSTRATION OF COMPLIANCE

The requirement that a risk-assessment be performed that "demonstrate[s] that an equivalent level of safety to that established in the AMC" leaves a determination of safety at the sole discretion of the Agency. Under an SMS program, the organization should be able to make such a determination as part of its risk analysis and hazard reduction strategy.

We suggest allowing the individual organization to make a determination regarding what methods of compliance best suit their business model. Such a change would retain the requirement that organizations meet the standards required by the regulations, but would leave the means of compliance to the organization’s discretion. This is more consistent with the historical role of the AMC demonstration one way, but not the only way, to comply with a given regulation.

145.A.85 Changes to the organization

Provision (a)(2) requires prior approval by the competent authority for any change to the management system described in 145.A.65(a)(1)-(2). Prior approval is counter to the concept of a pro-active approach to safety.

The two requirements for which prior approval is needed are:

(1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager; and

(2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy.

The requirement of prior approval to changes in a system is contrary to the dynamic approach of SMS. When an organization undertakes a risk assessment or makes a determination that certain hazards should be prioritized over others, it is in the interests of safety for the organization to immediately implement such changes.

Under the requirements of the regulation, organizations are continuously evaluating risk and performance with respect to their safety policy. It makes little sense to require approval of improvements to those systems discovered out of compliance with the regulation. The regulation should anticipate that continuous monitoring, auditing, and risk assessment will result in changes to the management system. Prior approval should not be required to enhance safety systems.

Conclusion

The proposed change to Part 145 is expansive and complex. Due to the far-reaching nature of the proposed changes, we recommend further review of the changes as well as a gradual implementation. This will allow careful review of each of the proposed new elements and changes to ensure workability, as well as ensure that resources are not diverted away from current safety systems, thereby compromising safety for the sake of a rapid transition to SMS.

Respectfully Submitted,

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