



*A member of the SGS Group*

**ROTARY WING NEWSLETTER**

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# SAFETYWIRE



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## Notice of Proposed Rule Making Open for Comment

BY: Rhodri Norton-Quick

Source: FAA

In the words of Michael Scott , “OK, ITS HAPPENING, EVERYONE STAY CALM”.



After several years of will they, won't they; the Federal Aviation Administration has submitted it's [Notice of Proposed Rule Making \(NPRM\)](#) pertaining to 14 CFR Part 5 and Mandatory SMS for: “all certificate holders operating under the rules for commuter and on-demand operations, commercial air tour operators, production certificate (PC) holders that are holders or licensees of a type certificate (TC) for the same product, and holders of a TC who license out that TC for production.”

Basically, what this means in plain English: The FAA is extending part 5 beyond part 121 operators to include part 135 operators, § 91.147 air tour operators, and certain certificate holders under part 21. This is a “proposed rule”. This means you have until March 13th, 2023, to submit any comments to the FAA.

After slaving away on an incredibly detailed article, picking apart all the individual sub parts for important information, it was brought to our attention that much of it is covered in the Summary. Work smarter, not harder as they say. As such, what will follow is section B from the NPRM, or the summary.

And now from the hallowed halls of 800 Independence Avenue:

### **B. Summary of the Proposed Rule**

An SMS requires four essential components—safety policy, safety risk management, safety assurance, and safety promotion. Additionally, an SMS requires that an organization document the system itself and maintain any records produced under that system. In this NPRM, the FAA proposes to expand the applicability of the SMS requirements to include additional entities, add new require-

ments to part 5, and amend existing regulations in parts 5, 21, 91, and 119. Several of these proposed amendments respond to the statutory mandate in ACSAA.

Specifically, the FAA proposes to expand the applicability of part 5 beyond part 121 operators to include part 135 operators, § 91.147 air tour operators, and certain certificate holders under part 21. These entities would receive the greatest safety benefits of an SMS as they are best situated to prevent future incidents and aviation accidents.

In response to the statutory requirements in ACSAA, the FAA proposes to add a requirement for each SMS to include a code of ethics that applies to all employees and clarifies that safety is the highest priority. Consistent with ACSAA, the FAA also proposes to revise the existing requirement for a confidential employee reporting system by adding a provision to ensure that employees can report without concern of reprisal.

Additionally, the FAA proposes several amendments to part 5 that are intended to increase the effectiveness of SMS, including several new requirements. The FAA proposes to require organizations to develop a system description, which is a summary of aviation-related processes and activities and a description of interfacing persons that contribute to the safety of the organization's aviation-related products and services. The FAA proposes to add information that must be considered during the system analysis, which is conducted when a person applies safety risk management. Specifically, the FAA proposes to require persons to consider the interfaces of the system in conducting the system analysis. The FAA also proposes to require persons who identify hazards to notify interfacing persons who are best able to address or mitigate the hazard. To account for these new requirements, the FAA proposes conforming amendments to the SMS documentation and recordkeeping requirements to ensure organizations document the system description and retain all communications concerning the notification of hazards to interfacing persons. Furthermore, the FAA proposes several amendments to part 5, including a revision to the definition of "hazard" to ensure it encompasses aviation incidents as well as accidents, the relocation of the definitions to the beginning of the subpart to facilitate readability of part 5, and the removal of all references to the term "certificate holder" to conform to the new applicability proposed by the rule. The FAA also proposes amendments to certain regulations in parts 21, 91, and 119 to conform with, and enable the implementation of, the proposed requirements in part 5.

The following table summarizes the proposed provisions and provides the proposed section(s) of the Federal Aviation Regulations that contains the provisions.



TABLE 1—SUMMARY OF MAJOR PROVISIONS

Provision	Proposed 14 CFR § affected	Summary of proposed provision
Applicability of part 5	5.1, 21.55, 21.135, 21.147, 91.147, and 119.8.	Expand the applicability of part 5 (currently limited to part 121 operators) to make SMS requirements applicable to part 135 operators, §91.147 air tour operators, and certain holders of a TC <sup>6</sup> and PC issued under part 21 for the same product. <sup>7</sup>
Definition of “Hazard”	5.3 <sup>a</sup>	Revise the definition of “hazard” to also mean conditions or objects with the potential to cause or contribute to an incident.
General Requirements	5.5(b)	Add a new requirement to develop and maintain a system description that includes information about the aviation products or services provided by the person and a description of the interfacing persons that contribute to the safety of the person’s products or services.
Part 121 operators	5.7(a)	Require part 121 operators to revise their current SMS in accordance with the new requirements of part 5 and to submit revisions no later than 12 months after effective date of final rule.
Applicants seeking to operate under part 121.	5.7(b)	Require applicants seeking to operate under part 121 to develop and implement an SMS in accordance with part 5 and to submit a statement of compliance as part of the certification process.
Part 135 operators and §91.147 air tour operators.	5.9(a)	Require part 135 operators and §91.147 air tour operators to develop and implement an SMS in accordance with part 5 and to submit a statement of compliance no later than 24 months after the effective date of final rule.
Applicants seeking to operate under part 135 or §91.147.	5.9(b)	Require applicants seeking to operate under part 135 or §91.147 to develop and implement an SMS in accordance with part 5 and to submit a statement of compliance as part of the certification or LOA process.
Holders of PC and TC for the same product.	5.11	Require any person that holds a PC and TC <sup>9</sup> issued under part 21 for the same product to develop an SMS in accordance with part 5; to submit an implementation plan for FAA approval no later than December 27, 2024; and to implement the SMS no later than December 27, 2025.
TC holders applying for a PC for same product.	5.13	Require TC holders <sup>10</sup> who apply for a PC for the same product to develop an SMS in accordance with part 5, to submit an implementation plan for FAA approval during the certification process, and to implement the SMS no later than one year after obtaining FAA approval.
TC holders who have a licensing agreement to allow other persons to obtain a PC.	5.15(b)	Require TC holders, who have a licensing agreement to allow other persons to obtain a PC, to develop an SMS in accordance with part 5; to submit an implementation plan for FAA approval no later than December 27, 2024; and to implement the SMS no later than December 27, 2025.
TC holders who enter into a licensing agreement to allow other persons to obtain a PC.	5.15(c)	Require TC holders, who enter into a licensing agreement to allow other persons to obtain a PC, to develop an SMS in accordance with part 5, to submit an implementation plan for FAA approval when providing written licensing agreements to the FAA, and to implement the SMS no later than one year after obtaining FAA approval.
Implementation plans	5.17	Require implementation plans filed under §§ 5.11, 5.13, and 5.15 to include a description of how the person intends to comply with part 5, and for the person to make available, upon request, all necessary information and data that demonstrates that the SMS has been or will be implemented in accordance with the implementation plan.
Safety policy	5.21(a)(7)	Add a new requirement for the safety policy to include a code of ethics that is applicable to all employees, including management personnel and officers, which clarifies that safety is the organization’s highest priority.
System analysis and hazard identification.	5.53(b)(5)	Add a new requirement for the person conducting the system analysis to consider the interfaces of the system.
Safety performance monitoring and measurement.	5.71(a)(7)	Revise the requirement for a confidential employee reporting system by adding a provision to ensure that employees can report without concern of reprisal.
	5.71(c)	Add a new requirement for holders of both a TC and PC for the same product to submit a summary of the confidential employee reports to the FAA every 6 months.
Notification of hazards to interfacing persons.	5.94	Add a new section to: (1) require the person who identifies a hazard to notify the interfacing person who, to the best of their knowledge, could address the hazard or mitigate the risk; and (2) require procedures for reporting and receiving hazard information with interfacing persons.
SMS documentation	5.95(c)	Add a new requirement for SMS documentation to include the system description.
SMS records	5.97(d)	Add a new requirement for persons to retain records of all communications provided under new §5.94 for a minimum of 24 consecutive calendar months.



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## Customs, Culture, Community

(Source: Larry Fields, FAA( Acting) Flight Standards Service Executive Director)  
(FAAST Safety Briefing Jan 6,2023 )

# FAA > SAFETY BRIEFING

The FAA Safety Policy Voice of Non-commercial General Aviation

## Customs, Culture, Community

JUMPSEAT an executive policy perspective



Several FAA employees travelled to Montreal in September to represent the United States at the International Civil Aviation Organization’s (ICAO) triennial general assembly. This gathering provided multiple opportunities to interact with civil aviation authority counterparts from dozens of countries around the world. Throughout this meeting, members of our team were intensely aware that everything they said or did would reflect not just on them as individuals, but also on our country and on the agency they represented





## A Culture of Compliance

Like countries, communities of every kind have a culture that arises from customs and shared values. If you were to make a list of your own aviation customs and values, safety is surely at the top of your list. Here at the FAA, safety is the top priority. It's the reason this agency exists in the first place.

Our tasks include establishing the foundation for aviation safety. Regulations are part of that foundation, but there's much more. As stated in the FAA's Compliance Program, our objective is to identify safety issues that underlie deviations from standards and correct them as effectively, quickly, and efficiently as possible. The FAA's approach to compliance stresses collaborative problem-solving (e.g., engagement, root-cause analysis, transparency, and information exchange) wherever possible.

The FAA Compliance Program is also aimed at furthering evolution toward a "just culture." That means a culture with both expectation of, and appreciation for, self-disclosure of errors. It gives due consideration for honest mistakes, especially in a complex environment like the National Airspace System (NAS). But since even unintentional errors can have a serious adverse impact on safety, we must ensure that the underlying safety concern is fixed every time.



## Walk the Walk; Talk the Talk

In this issue of the FAA Safety Briefing magazine, we will explore some of the mindset, skillset, and toolset items that can help you do your part as a solid aviation citizen. But let me set the stage with a couple of fundamental ideas.

Although some see “etiquette” as a stuffy word, there’s nothing stuffy about what it means: treat your fellow human beings with courtesy and respect. If you visit a country whose citizens treat you rudely, would you be eager to go back? Of course not. There are enough pressures already to deter potential aviators without adding discourtesy. Treat everyone you meet — fellow pilots, potential pilots, and non-pilots — with the kind of respect and courtesy that makes them eager to be part of our group.



Language is another important part of good aviation citizenship. When you visit a country with a different language, it is courteous to make efforts to use that language, even if you can only manage a few words. The community of aviation certainly has a language of its own, one with a long history and a highly specialized vocabulary. As good aviation citizens, we should strive to use that language as precisely and as correctly as we can when we are operating in the system. Listen before you key the mike to transmit. Speak clearly and succinctly. Use proper phraseology. Whether on the radio or speaking to student pilots, potential aviators, or non-flyers, speak our language in a way that achieves the goal of communication.

As the saying goes, we never get a second chance to make a good first impression. In an environment where there are many financial and other challenges facing those who want to fly, each of us needs to cherish the precious privileges of aviation and strive to bring honor both to our community and to our fellow aviators.

FAA Safety Briefing: Leading By Example  
How Modeling and Mentoring Can Elevate Aviation Safety

## No More Excuses

(Source: Christopher Young, Orig. Published 1/9/2023 in Rotor Media)



Photo above: Mark Bennett

### **Always do your safety homework: risk management doesn't take a sabbatical.**

It's time we rotorheads stop lamenting or seem surprised when things go bad. Instead, we need greater focus on making positive change for our industry. And yes, each of us plays a role in the outcome.

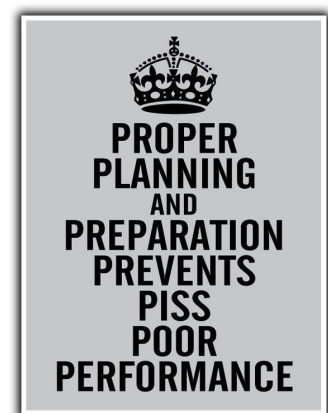
The fatal accident rate in the helicopter industry still isn't improving like it should be. In its cumulative FY 2022 rotorcraft accident summary, October 2021–May 2022, the FAA reported 71 accidents and 15 fatal accidents, with 26 fatalities, in the United States. The FY 2022 estimated fatality rate through May was 1.35 per 100,000 hours—way too high!

In December 2021, the industry experienced four fatal accidents with a loss of seven lives. According to the FAA data, the number of fatal accidents was the highest for any December since FY 2005, and the seven fatalities were the second highest recorded for a December in the past 10 fiscal years.

These statistics are alarming and should motivate you to take stock of your own processes and the processes in your organization. We need to stop making excuses and always do our safety homework. Risk management doesn't take a sabbatical.

### **The 7 Ps**

When I was young, I distinctly recall my father—who spent a career in the US Navy—often using an old military adage at home. Perhaps you've heard it: "Prior Proper Planning Prevents Piss-Poor Performance." The saying originated in the British Army and can be recognized nowadays in several variations.



metal-plaques-us



I was fortunate to be reminded of this expression in my own military profession by instructors who constantly reinforced its importance (and not always with a sympathetic delivery). No matter what version of the adage you might be familiar with, it speaks to the need for preparation in producing positive outcomes.



Consistent, successful performance of aviation activities doesn't happen because the work is easy or good luck is with you. Successful performance results from constantly doing your homework. As Todd Conklin, a senior advisor at the US Department of Energy's Los Alamos National Laboratory, says, "Safety isn't the absence of accidents. For us, safety is really the presence of defenses. We have to move away from reacting to consequence and start responding to context."

The context Conklin refers to is the connection between all the factors leading to a negative result in a complex operating environment. Having a deeper understanding of all the mission components and how the overall aviation system influences performance is critical to an individual or organization's ability to create and implement the proper defenses.

Knowing each step needed to accomplish a task (in flight or on the ground) is a vital element of risk mitigation. We need to remove the guesswork and disorder from our daily operations to fully appreciate the potential for hazards.

When we look at industry safety management guidance regarding hazard identification, the system description is almost universally accepted as the primary method for initially understanding the aspects of the operation that might be exposed to harm. Unfortunately, many of us don't spend the necessary time to complete this very important activity (i.e., we don't do our homework). We skip it altogether, make only a cursory effort to finish it, or think it's too late in our business life cycle to do it.

This approach often results in a reactive nature within our organization because we never consider or anticipate what might go wrong. Instead, we wait for the consequence rather than reduce the likelihood of a negative event by preparing for it beforehand.

As Conklin explains, "Focusing on the consequence is not the priority because it has already happened—it is too late to stop it. If we spend time reacting to the consequence, what we're missing is the opportunity to respond to context."

Remember, the context is all the factors contributing to or enabling the consequence. In other words, the context is the environment in which the failure is allowed to occur.

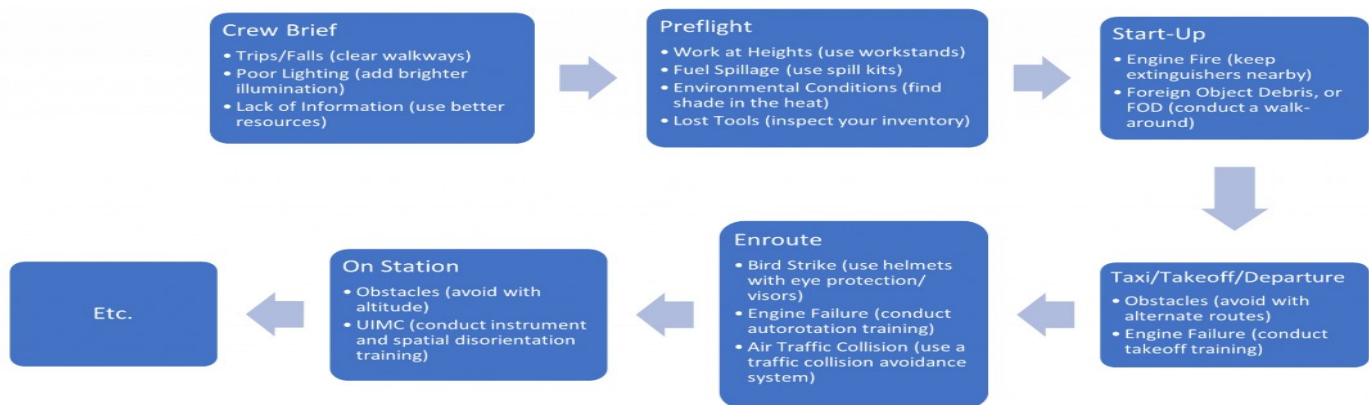
## Using System Descriptions to Improve Safety Outcomes

The FAA describes systems as “integrated networks of people and other resources performing activities that accomplish some mission or goal in a prescribed environment.”

Any combination of elements can affect a system at any given time. This is especially true in our aviation system: operations are dynamic and often unscripted, resulting in risk being extremely fluid. As a result, the underlying processes or activities of your system need to have safety concepts integrated into their design if you are to expect optimal safety outcomes.

So, in developing your system description, ask the context question, “How does this happen, and what affects it?” for each of your work tasks. This step will help you better understand context and produce viable solutions or safety capacity..

Using a simple flowchart can help you visualize each of the steps in this process and account for all your system’s activities (see sample below). As an example, for a patrol-type mission, you might begin documenting the process with the crew brief, followed by the aircraft preflight. Then, add the start-up, taxi/takeoff/departure, enroute, on station, and so on. For each of these steps, you’ll want to brainstorm the different possible hazards and the factors contributing to them.



During the preflight, for example, you might list as potential hazards working at heights, fuel spillage, unfavorable environmental conditions (heat or rain), missing tools, and blown debris from nearby aircraft. Or, during the enroute phase you might identify the potential for bird strikes, engine failure, air traffic collision, weather-related issues, and airborne obstacles.

Once you’ve identified the hazards, you can assess the risk of them occurring and their potential impact. Last, you’ll want to identify the controls or mitigation that will reduce the likelihood of any of these hazards causing harm (such as additional training, alternative routes, new equipment, and the like).

Creating a flowchart may seem like a time-intensive way to document processes, and maybe that's why so many organizations don't complete this crucial step. Often, they say it's too time-consuming; they have other, more important things to do; their operation is too small for it to matter; or they already know what they need to do. *Everybody hates to do their homework!*

It's also common—when organizations do document their processes—for them to neglect to include the people performing the work and the process owners (typically the department or division leaders, such as the director of operations or the director of maintenance). Reasons given include the individuals are never available or it's inconvenient to include them. But involving the people who perform the work will help you more effectively identify what takes place, because they're the specialists and are closest to the potential hazards your system faces.

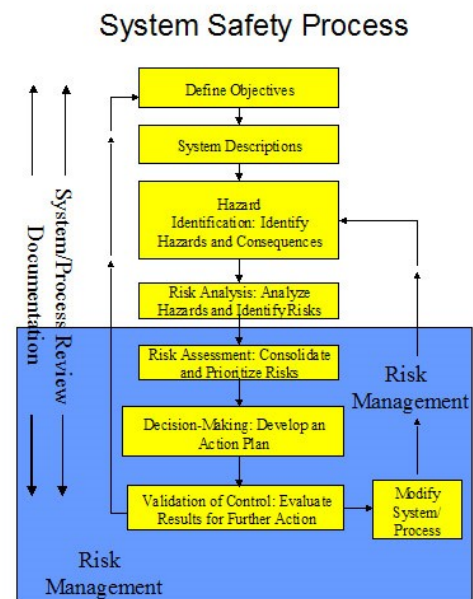
### The Rewards of Doing Your Homework

I get that you're managing a business and trying to generate revenue. However, I urge you to think of the impact an unanticipated hazard event resulting in damage, injury, or—worst case—a fatality could have on your organization. Looking beyond the harm to your reputation and finances, consider first your employees and families (yours and theirs), the emotional strain such an event could place on them, and the potentially lasting effects (if the event doesn't cause you to cease your operation).

I can't promise that completing a comprehensive system description will be a panacea, but I can promise that by composing one you'll produce greater awareness, build engagement, and gain perspective on and better understanding of the context in which you operate. As a result, your organization will improve its margins for safety, produce more reliable outcomes, and create success by planning for the necessary support.

Numerous owners and managers who've completed system descriptions have told me they discovered various hazards and solutions they hadn't previously thought of, despite being in business for many years.

Be aware: maintaining system descriptions is a continuous work in progress; you should expect to review them regularly for adequacy and change. With your processes documented, you now have an effective tool for training, budgeting, and demonstrating your diligence to the public, customers, insurance providers, lawyers, and regulators.





The work involved in following this approach to hazard identification isn't overwhelming. For it to provide real perspective, however, every operator—large or small—must take it seriously. You'll find it's a much more effective and less costly method of risk management than waiting for the consequence to occur.

Our industry and your operation depend on the ability to effectively manage the risk exposures we encounter every day. By doing a little extra homework, you'll be on a path to safety and reliability success.

Conklin said it best: "Create stability and have the capacity to fail safely."

## Author



### Christopher Young

Chris Young is a broker with Pik West Insurance Agency and the executive director of the Tour Operators Program of Safety (TOPS). He has 30 years of aviation and leadership experience in the US Navy as well as the helicopter air ambulance, aircraft manufacturing, aviation safety, technical publications, and insurance segments, with over 2,900 flight hours as a pilot. Chris is active in the helicopter safety community as the cochair of the US Helicopter Safety Team's Outreach Team and as secretary of the HAI Safety Working Group.

[View all posts](#)





## Monthly Safety Report January 2023

The USHST is a regional partner to the Vertical Aviation Safety Team (VAST).

**USHST GOAL:** Reduce the 5 year average fatal US helicopter accident rate to **0.55 fatal** accidents per 100K hrs by 2025

**USHST Vision:** A Civil Helicopter Community with Zero **Fatal** Accidents

Safety by the Numbers!

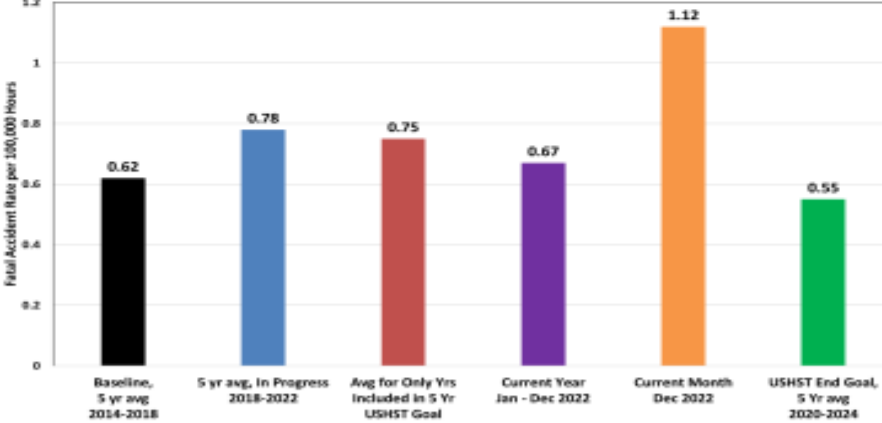
Metric	2018 - 2022	2017 - 2021
<b>Avg Fatal Acc Rate</b>	<b>0.78</b>	<b>0.76</b>
<b>Avg Accident Rate</b>	4.21	4.00
Year To Date	Current Year (CY22)	Previous Year (CY21)
<b>Fatal Accidents</b>	18	22
<b>Accidents</b>	128	117
<b>Fatalities</b>	32	42

### Average number of days between fatal accidents:

2018: 14 days  
 2019: 16 days  
 2020: 18 days  
 2021: 17 days  
 2022: 21 days

### Longest time between fatal accidents (past 5 yrs):

**107 days (2020)**



Category	Rate
Baseline, 5 yr avg 2014-2018	0.62
5 yr avg, In Progress 2018-2022	0.78
Avg for Only Yrs Included in 5 Yr USHST Goal 2020-2022	0.75
Current Year Jan - Dec 2022	0.67
Current Month Dec 2022	1.12
USHST End Goal, 5 Yr avg 2020-2024	0.55

### Fatal Accident Counter

**44 : 02 : 16 : 56**

Days : Hours : Mins : Secs

Each year the U.S. helicopter industry safely flies approx. 3 million flight hours and **every** second of **every** flight must be handled with professionalism.



## Did "YOU" Know?

In the US there are **12,000 +** helicopters, **32,000 +** helicopter pilots and over **292,000** aircraft mechanics!

The USHST has identified the following industries for **OUTREACH**:

**Personal/Private,  
Helicopter Air Ambulance (HAA),  
Commercial and Aerial Application**

Your participation in joining our vision of zero fatal accidents is important to us. To determine how your interests best align with active USHST efforts, please click the link below to complete the form and submit.



### [JOIN/FOLLOW USHST](#)

[USHST Facebook](#) (2541 Members, 4 New)

[USHST LinkedIn](#)

[USHST Twitter](#)



### Helicopter Safety OUTREACH events:

- Next USHST All Hands Webinar - **February 23, 2023, 1pm EST** [Register Today!](#)  
[Previous All Hands](#) - November 14, 2022
- [ROTOR Helicopter Association International - Upcoming Events](#)
- [Helicopter Safety Alliance - Upcoming Events](#)



#### Safety Enhancement Quick List



### U.S. Helicopter Safety Team

### Helicopter – Safety Enhancements

Our Vision: A civil helicopter community with zero fatal accidents

#### [Loss of Control - Inflight \(LOC-I\), Unintended Flight into IMC \(UIMC\), Low Altitude Operations \(LALT\).](#)

USHST continues to work on the implementation of 16 Helicopter - Safety Enhancements (H-SE) developed through data-driven analysis of 104 fatal accidents. The H-SE's use Outreach, Policy, Technology/Equipment, and Training to reduce fatal accidents in these categories.

#### [H-SE 124: Understanding of Basic Helicopter Aerodynamics](#)

**FAA and industry to review and revise materials explaining basic helicopter aerodynamics to emphasize recognition of unsafe aerodynamic situations and apply appropriate corrective actions.**

1. FAA and industry to review the Helicopter Flying Handbook (FAA-H-8083-21A) and Helicopter Instructor's Handbook (FAA-H-8083-4) and pertinent Advisory Circulars to assess explanations of unsafe aerodynamic situations and provide recommendations for revisions.
2. FAA to revise the Helicopter Flying Handbook and Helicopter Instructor's Handbook and pertinent Advisory Circulars concerning unsafe aerodynamic situations, to include vortex ring state, low G mast bumping, and low RPM rotor stall guidance.
3. FAA to issue advisory circular on the Vulchard Recovery Technique from vortex ring state.
4. FAA to revise AC 61-83, as amended (Nationally Scheduled, FAA-Approved, Industry-Conducted Flight Instructor Refresher Course) to add critical helicopter aerodynamics to the core topic list.
5. USHST SEA Training Team to develop presentations/promotional materials regarding identification of and response to vortex ring state, low RPM rotor stall, and low G mast bumping for use by the training community.

**USHST PRIORITY Safety Resources:**

[Videos](#)

[Safety Apps](#)

[USHST Report on Safety Enhancements](#)

## US Helicopter Safety Team Press Release (November 2022): [USHST Searching for Next Industry Co-Chair!](#)



# USHST

United States  
Helicopter Safety Team





# SAFETY MANAGER'S CORNER

## SafeTALK

### Questioning attitude

How does attitude affect your work and safety on the job? What is your attitude today? We all have days where our overall attitude could improve, but how is yours towards your coworkers, boss, or safety, on a day-to-day basis? If you are generally a negative person, what effects would a more positive attitude have on your life, and on your work?

#### A questioning attitude:

A questioning attitude fosters situational awareness, encouraging thought about safety before action is taken. Being mindful of the work situation helps a person maintain an accurate understanding of the work conditions at any given time. It alerts people to imminent hazards, warning signs and uncertainties in the work environment or plan. It also encourages workers to stop and resolve hazards, and take heed of warnings or uncertainties, before proceeding with the job. Doubt must be followed up with the discovery of facts, not assumptions, to reveal more knowledge about the situation in order to eliminate doubt.

□ Examples include situations as simple as walking by a broken door day after day without stopping and questioning why it remains broken, or skipping over a confusing step in a procedure you use every day rather than getting clarification. Another example could include ignoring an alarm because nuisance alarms go off all the time and they never indicate an actual emergency. Or something a little more complicated, such as not speaking up to question a calculation that doesn't seem right, because the direct

Complacency and lack of knowledge undermine awareness. Most people tend to assume everything is alright and that activities always go as planned. A questioning attitude promotes a preference for facts over assumptions and opinion.

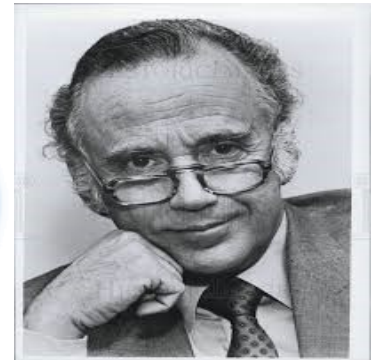
#### How to improve your safety attitude

1. Recognize it The first step to improvement is to recognize negativity. Ask yourself how your attitude is today. If it is negative then you need to try to improve it to be a safer, more efficient worker.
2. What is the source of the issue(s)? After you recognize the state of your attitude, you need to find the source of the issues that are making it negative. What is bothering you? Is it a coworker? A family situation? Whatever it may be, take note of the negative sources.
3. Address the issues. Take the time to address what is having a negative effect on your attitude. For example, if it is an issue with a coworker or boss, have a conversation with them. Most issues can be resolved with a constructive conversation. If the issue cannot be resolved with a conversation with the other person, go to another level of management to resolve it.

## Quote of the Month

“Nothing is predestined. The obstacles of your past can become the gateways that lead to new beginnings.”

– Ralph Blum



This is a beautiful encapsulation of what SMS is. We are attempting to learn from the past, so that the future is brighter. The new beginning starts the moment your organization embraces the new way of SMS

## On Short Final...



On a more serious note, Please contact us if you would like to discuss the new FAA NPRM regarding SMS—who it applies to, how it can be implemented, and what we can do to help you.

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# PRISM PREFERS

www.argus.aero

## UPCOMING COURSES

Feb 14 to Feb 16, 2023—PROS Course

### Virtual ICAT Training (ICAT)

Denver, CO

Feb 20 to Feb 24, 2023—PROS Course

### Aviation Lead Auditor Training (ALAT)

Denver, CO

March 28 to March 30, 2023—PRISM Course

### Safety Management System (SMS)

Denver, CO

May 15 to May 19, 2023—PROS Course

### Aviation Lead Auditor Training (ALAT)

Denver, CO

Aug 21 to Aug 25, 2023—PROS Course

### Aviation Lead Auditor Training (ALAT)

Denver, CO

Sep 26 to Sep 28, 2023—PRISM Course

### Safety Management System (SMS)

Denver, CO

Oct 30 to Nov 3, 2023—PROS Course

### Aviation Lead Auditor Training (ALAT)

Denver, CO

Go to [Upcoming Training Classes](#) to register.

