



## **FSSD Bulletin: 004-2015 [Effective 08 October] Re-Validation of Existing AOC Holders**

This bulletin outlines the general guidance for that will be used to confirm revalidation of the air operators to the revised aviation regulations.

### **1.1 GENERAL**

#### **1.1.1 PURPOSE**

This bulletin provides the policies and general procedures that will be used for the revalidation of Vietnam air operators for operations that they are currently authorized.

#### **1.1.2 BACKGROUND**

- A. International auditors have asserted that the CAAV records of certification of air operators were not complete enough to substantiate the approvals granted and the operations conducted by the Vietnam air operators.
- B. In consideration of these assertions, the CAAV has undertaken a revalidation process for each air operator that will result in adequate records of evaluations, inspections and demonstrations of a comprehensive revalidation.

#### **1.1.3 APPLICABILITY**

The privilege of revalidation is only applicable to—

- 1) Vietnam Airlines
- 2) Viet Jet
- 3) Jetstar Pacific Airlines

- The goal of this process is the re-validation of all regulated entities.
- Where possible, the FSSD is incorporating the re-validation of those entities with, and in addition to, the focus of the projects in this bulletin.

#### **1.1.4 STATUS OF THIS BULLETIN**

##### **1.1.4.1 Issuance**

This is a [2]2016 re-issuance of this bulletin due to the elongated Document Evaluation Phase necessary to accommodate the 5 different fleets of aircraft and the fact that the extensive work is necessary to incorporate the regulations as policy text in the operator's manual. Additionally the re-validation of Viet Jet and Jetstar Pacific Airlines are now underway.

##### **1.1.4.2 Expiration**

The guidance in this bulletin will expire 30 September 2017 or upon completion of these re-validation projects, whichever occurs first.

#### **1.1.5 REFERENCE DOCUMENTS**

The following key reference documents will be used in the revalidation process of this bulletin—

- VAR Parts 6, 10, 12, 13, 14, 15, 16, 17, 18.
- CAAV-FSS Technical Inspector Manual: AOC Administration Manual
- CAAV Advisory Circular AC 00-004, Development of Acceptable Regulatory Compliance Checklist.
- CAAV Advisory Circular: AC 12-001 Air Operator Original Certification



- CAAV-FSS Technical Inspector Manual: Airworthiness Inspector Manual
- CAAV-FSS Technical Inspector Manual: Operations Inspector Manual
- All job aids and advisory circulars relevant to the operations of the airline.

## 1.2 EXPEDITED PROCESSING

A. The CAAV will give priority to those air operators that consider themselves prepared and currently have the capability to conduct operations to the United States.

- Vietnam Airlines will be given priority for CAAV revalidation resources because they currently operate aircraft that are capable of flying non-stop to the United States.
- Viet Jet Airlines will be given, through a parallel process, priority for CAAV revalidation resources because they conduct international commercial air transport operations.

The revalidation process for the remaining air operators will be prioritized after the processing of Vietnam Airlines and VietJet reaches the point in this process for scheduling validation flights.

B. The CAAV has established a Certificate Management Team (CMT) within the FSS with resources dedicated to certificate management duties, including certification and on-going surveillance of Vietnam Airlines and Viet Jet.

## 1.3 REVALIDATION 5-STEP PROCESS

The revalidation project of AOC holders of large aircraft will consist of 5 distinctly separate sub-projects that follows the guidance of the AOC Administration Manual—

### 1.3.1 PRE-APPLICATION PHASE

- *This phase began with the issue of this bulletin.*
- During this phase, the CAAV re-validation team will meet to review the applicable guidance and prepare for a meeting with the operator.
- Then they will conduct a “Pre-Application” meeting with the operator to discuss the revalidation process and outline the manuals and documents that must be submitted to the CAAV to start the next phase.
- The operator will be requested to provide 1 hard copy and 1 digital copy of each document.



The completion of all applicable portions, events and actions of the Job Aid AOC-001 (and any supplements) shall be annotated by the CPM.

### 1.3.2 FORMAL APPLICATION REVIEW PHASE

- *This phase begins when the operator provides, in one package, the manuals and documents that it is currently using to operate the airline.*
- The first step will be to consolidate these documents in one location and review the package for a complete submission.
- An incomplete submission of the documents must be returned to the operator and the process should be suspended pending the submission of a complete package. It is unacceptable that an operating airline cannot provide a complete package of the manuals and documents necessary to operate the airline.



The completion of all applicable portions, events and actions of the Job Aid AOC-002 (and any supplements) shall be annotated by the CPM.



- It will also be necessary to archive previous copies of these documents that have been in the possession of the CAAV to ensure that there are no conflicting documents evaluated during this process.
- This will be a focus area of any international audit team.



- The team will, as a group, review the manuals to ensure that they are compatible with the AOC certification guidance for such documents. But, during this phase, these documents will not be evaluated in detail.
- When the package is determined to be complete, the CAAV will have a meeting with the operator to outline the events of the next phase (Document Evaluation) and request their support should the need for any revisions be noted.

**1.3.3 DOCUMENT EVALUATION PHASE**

- This phase will be conducted as outlined in the AOC Administration Manual.
- The CPM will assigned the evaluation of the manuals and documents to specific members of the revalidation team.
- During this phase, individual documents may be returned to the operator for revision. This should be accomplished by digital PDF file commenting.
- The revalidation team will follow their guidance for these evaluations and advise the CPM when they have completed the evaluation.
- The CPM will ensure that, as the documents are determined to be acceptable, an instrument of approval is issued for each document. This approval/ acceptance instrument will supercede all previous approvals.
- The phase will be ended only when all submitted documents have been evaluated, the applicable Regulations Compliance Checklists are in acceptable final form and the appropriate instruments of approval have been issued.

- The satisfactory completion of the applicable Regulations Compliance Checklists will be critical to completion of this Phase.
- Where these RCCs have not been completed correctly the FSSD shall return the documents to the operator until all document corrections have been completed satisfactorily.



The completion of all applicable portions, events and actions of the Job Aid AOC-003 (and any supplements) shall be annotated by the CPM.

**1.3.4 INSPECTION & DEMONSTRATION PHASE**

- Some early events of this phase may overlap the Document Evaluation phase. As approvals are renewed, some preliminary inspections may be accomplished.
- The inspectors will accomplish the inspections outlined in the AOC Administration Manual taking care to follow the sequencing outlined in the Inspections & Demonstrations Phase.
- Unless there is documented evidence that previous emergency evacuation and ditching demonstrations were accomplished for the aircraft type, these events will be accomplished during this phase.
- Because the airline is currently operating, the CAAV will do a series of validation flights to enable the inspectors to observe all aspects of the airline operations. I
- t is anticipated that there will be findings that will necessitate at least one additional validation series to determine resolution has occurred.
- This phase will end when all CAAV concerns identified during this process have been resolved satisfactorily



- The revalidation team must avoid any temptation to bring up technical issues during this conformance evaluation.
- Devote this period strictly to ensuring that applicant has included polity and procedure to meet regulatory safety standards.



The completion of all applicable portions, events and actions of the Job Aid AOC-004 (and any supplements) shall be annotated by the CPM.

### 1.3.5 FINAL CERTIFICATION ACTIONS PHASE

- This phase will be accomplished as outlined in the AOC Administration Manual.
- The CAAV will re-issue the AOC and the aircraft display operations specifications.
- The CAAV will compile the Completed Certification Report in accordance with AOC guidance.



The completion of all applicable portions, events and actions of the Job Aid AOC-005 (and any supplements) shall be annotated by the CPM.

## 1.4 MUTUALLY ADVANTAGEOUS

- A. This revalidation project is mutually advantageous to both the airlines and CAAV, in that it will serve to confirm that the Vietnam AOC holders have been properly certificated to international standards. This confirmation should lead to more timely approvals for international operations.
- B. Airlines involved in revalidation should support this process by—
- 1) Ensure compliance of their employees and service providers,
  - 2) Provide timely support (personnel and documents) to facilitate the process,
  - 3) Ensure timely access to local and international facilities; and
  - 4) Cooperate with the CAAV-FSS to achieve timely resolution of any regulatory issues identified.

### 1.4.1 REVALIDATION TEAMS

- A. The CAAV-FSS will use the technical personnel assigned to each airline as the core members of the revalidation teams. The team will consist of a—
- Certification Project Manager
  - Principal Operations Inspector
  - Principal Maintenance Inspector
  - Principal Avionics Inspector
  - Cabin Safety Inspector
- B. When technical evaluation of aircraft type-specific manuals and training is required, the CAAV must use inspectors that are aircraft-type and -equipment qualified, The team will be supported by—
- Aircraft type-specific qualified flight operations inspectors
  - Maintenance inspectors will qualification in the aircraft-specific maintenance
  - Avionics inspectors with qualification training in the aircraft-specific avionics and computer systems

The CPM may also function as one of the technical specialties in the revalidation team.

### 1.4.2 CASORT PROJECT NUMBER

- A. A Project Number will be assigned and inserted into the Project Number list for this period of regulatory conformance.
- B. All participating inspectors will use the assigned sub-project number for any CAA Action entries relating to this regulations conformance period.

### 1.4.3 CASORT ENTRIES

Each member of the revalidation team and any supporting inspectors must make—

- 1) At least one CASORT Action entry each day; and



- 2) Where applicable, an entry for each manual that was included in their revalidation of the compliance checklists on that day.

#### 1.4.4 PREPARATION FOR RE-VALIDATION

A. The re-validation team must review the CAAV files for:

- 1) The AOC certificate granted to this organization;
- 2) The current operations specifications issued to this organization;
- 3) The approved Operations and Maintenance Manuals in PDF file format (or an alternative method acceptable to CAAV);
- 4) Any other manuals (e.g. Safety Management Manual, that may be in use by the organization;
- 5) A regulations compliance checklist for VAR Part 6, 10, 12, 13, 14, 15, 16, and 17 requirements applicable to this type of operator;
- 6) The CAAV records of surveillance for the past 12 months;
- 7) The resolution of any safety concerns identified by CAAV during surveillance or incident or complaint investigation; and
- 8) The previous CAAV records of certification.

● Failure of the operator to provide these documents may necessitate an investigation of capability rather than a re-validation.

Refer to AC 12-001 for a list of the possible manuals that may be approved for this operator.

If the operator never submitted these regulations compliance checklists, they must submit them during Phase 2.

B. The operator's accountable manager should be advised by the CPM of the CAAV intent to conduct a formal re-validation process.

- The CPM should provide this notification by telephone contact, followed by a formal letter.
- The CPM should be prepared to conduct a "Pre-Application" meeting with the operator's management to explain the re-validation process and goals before initiation of the first validation inspections.

C. The re-validation team should advise the organization of the timing of the initial validation inspections and the necessity to have all managers and records available.

D. The re-validation team will follow the operations and airworthiness manuals for acceptable documents with emphasis on the following—

- 1) Regulatory compliance checklists must be fully completed;
- 2) Evidence of all current CAAV approvals must have a corresponding record of evaluation and/or inspection to support the decision.



- The "final" RCCs must demonstrate that the operator is in compliance with the regulations.
- The instruments of approval must be supported by a CASORT Action record and/or job aid.

#### 1.5 REGULATIONS DOCUMENT CONFORMANCE

A. The CAAV will establish that the AOC holders are in complete compliance with the applicable regulations through the use of a Regulatory Compliance Checklist.



B. Because the primary thrust of this revalidation is conformance to the existing regulations, this activity is the most critical step in the process.

It is critical to revalidation that the CAAV is able to establish conformance with the applicable regulations complete the revalidation process.

C. The outcome of this portion of the Document Evaluation will be—

- 1) Manual cites for conformance to the regulations included in the manual system with the appropriate paragraphs of policy/procedure in specific manuals;
- 2) The manual text referenced by the regulations cite must contain or paraphrase the requirements of the regulations and not be less restrictive than the regulation requirement.

3) All required compliance checklists will be completed by the organization, with the specific manual and paragraph references cited for applicable regulations;

Organizations should conform to the guidance provided in AC 00-004 for the completion of Regulations Compliance Checklists.

4) The CAAV-FSS has audited the regulatory compliance checklists and manual references;

5) The final version of each conformance checklist is correct and acceptable to the CAAV-FSS.

### 1.5.1 CAAV-FSS PARTICIPATION IS AUTHORIZED

A. Normally the CAAV-FSS personnel are not authorized to assist an applicant in the detailed completion of a regulations compliance checklist.

Detailed support will only be given to those organizations that can provide the manuals enabled for searching in Acrobat Reader.

B. But during the transition period, the revalidation team may assist the organization’s personnel in the proper methodology for—

1) Acrobat searches for required policy and procedures text;

2) Locating and positioning the manual cite references in the manual text;

3) Advising the entry of manual and paragraph references in the RCC; and

4) Providing advice regards the proper applicant comment when there is no need for the organization to insert an applicable manual reference.



- The revalidation team must avoid any temptation to bring up technical issues during this conformance evaluation.
- Devote this period strictly to ensuring that applicant has included policy and procedure to meet regulatory safety standards.

C. During this period, the CAAV-FSS revalidation team is not authorized to—

1) Perform the tasks of the organization’s personnel to modify the manual text to insert the regulatory cities into the manual(s); or

2) Insert the proper manual references or comments into the regulations compliance checklist(s); or

3) Audit the compliance checklist while assisting the organization’s personnel;

● The audit function will be done in the CAAV-FSS offices.  
● A limited amount of the aviation organization personnel may be present.



### 1.5.2 EXEMPTIONS & DEVIATIONS

A. It is not unusual to issue both exemptions and deviations to organizations during their transition to new requirements if the CAAV determines that the organization—

- 1) Will implement an alternative method that has an equivalent level of safety;
- 2) Needs a period of time to fully implement the requirement; or
- 3) Is one of grouping of operators that should be given a deviation to achieve the overall objective of revalidation under the new regulations.

- The organization must officially request each exemption as outlined in VAR Part 1.
- The revalidation team should follow the guidance in VAR Part 1 related to exemptions.

### 1.6 IDENTIFIED ISSUES?

A. The use of Adobe commenting in the manuals is highly recommended. A copy of each saved digital file with comments should be retained for the CAAV files, before providing a duplicate copy of the file to the airline.

See the AOC manual chapter for guidance on Adobe commenting.

B. The CAAV-FSS revalidation team will follow the AOC manual guidance for processing manuals and compliance checklists, except the revalidation team may choose to expand on their comments and suggested corrections in meetings with organization's personnel.

C. With the organization's personnel correcting the documents on the computer, the CAAV-FSS team may read the comments and review the organization's corrections on-the-spot.

This action does not replace the requirement that the organization must submit the revised compliance checklists and other corrected document to the CAAV for subsequent audit.

#### 1.6.1 CONFORMANCE REQUIRED

This sub-project will be considered complete when—

- 1) The organization manual system has satisfactory regulatory citations located with the appropriate paragraph text;
- 2) All of the applicable regulatory compliance checklists have been completed and the references and comments are correct.

### 1.7 TECHNICAL PROGRAM EVALUATION

The start of this sub-project should be staggered to allow the regulatory conformance sub-project to become fully functional and progressing.

- Where possible, the inspector resources used for the regulatory compliance may also be used for certain technical program evaluations
- The caveat is that if they should only be used in a dual role if it does not detract from their Document evaluation work.

#### 1.7.1 GENERAL

A. For these evaluations, the CAAV will use additional technically qualified inspectors to targeted evaluations of specific technical programs.

B. The program selected by the CAAV management for evaluation will be based on level of risk imposed by the particular program.

- Complex programs (ETOPS and AWO) will be treated under a separate project number.

### 1.7.2 MCE PLAN FOR TECHNICAL PROGRAM EVALUATION

- A. Before starting this technical program sub-project, an Excel Plan must be developed listing the CASORT Action numbers for the evaluations and inspections that must be accomplished with a positive outcome.
- B. Make inspector assignments and upload this plan to CASORT before proceeding with the technical program evaluation.

A template for this MCE plan is controlled and available through the Data Quality Coordinator.

### 1.7.3 FOLLOW CAAV GUIDANCE

- A. Follow the guidance in the AOC Administration Manual for selection of technical programs/manuals and other document references
- B. Use the Operations and Airworthiness Inspector Manual guidance for specific review of programs/manuals. Also use the applicable advisory circulars as general guidance.

The CPM may recommend the reissue of approvals related to the specific technical programs/manuals as the acceptability for continued use has been confirmed.

## 1.8 CONDUCTING INSPECTIONS PRIOR TO VALIDATION FLIGHTS

- A. Review the AOC manual regarding inspections that should be conducted prior to initiating a series of validation flights.
- B. It is important that support organizations and crew records have been inspected prior to the validation flights.

### 1.8.1 MCE PLAN FOR THE VALIDATION FLIGHTS

- A. To ensure that the team is focused, before initiating the concentrated period of validation flights an Excel Plan must be developed listing the CASORT Action numbers for the inspections that must be accomplished with an “S=Satisfactory” outcome.
- B. Make inspector assignments and upload this plan to CASORT before proceeding with the this period of validation.

A template for this MCE plan is controlled and available through the Data Quality Coordinator.

### 1.8.2 FOLLOW CAAV INSPECTOR GUIDANCE

- A. Follow the guidance in the AOC Administration Manual for sequencing of preparatory inspections and demonstrations.
- B. Use the Operations and Airworthiness Inspector Manual guidance for specific inspections and demonstration.

## 1.9 VALIDATION INSPECTIONS

- A. The sub-project can actually occur at an point during the revalidation.
- B. The purpose of this sub-project is to “flush” out any safety concerns by conducting a concentrated period of inspections associated with specifically identified flights.

	<ul style="list-style-type: none"><li>● Remember that Validation flights may be conducted at any point during the re-validation.</li><li>● But a final validation flight sequence must be conducted at the end of Phase 4 to confirm the completion of the revalidation.</li></ul>
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- C. This will give the CAAV a chance to assess the operational functioning of its policies, programs and procedures

### 1.9.1 VALIDATION FLIGHT SEQUENCING

The validation flight sequence should consist of a minimum of 4 consecutive flights with QUALIFIED inspectors aboard the aircraft and at key points in the support organizations (to conduct inspections) as outlined in the AOC manual.

- Where possible, any issues identified by the team should be consolidated by the CPM and provided to the airline contact point for resolution before the subsequent flight.
- All identified issues must be inserted in CASORT and tracked to resolution.

- Where possible, the available qualified inspector workforce should be devoted to this concentrated series of validation inspections.
- During the conduct of the concentrated series of inspections, the other workload will be put on hold until the inspections are completed.

### 1.9.2 CASORT TRACKING NUMBER FOR VALIDATION FLIGHT EVENTS

- A. A tracking number should be assigned and inserted into the Tracking Number list for this validation flight period
- B. All participating inspectors will use this Project Number for any CAA Action entries relating to this technical program evaluation period.

### 1.9.3 MCE PLAN FOR VALIDATION FLIGHTS

- A. Before starting the inspections associated with the validation flights, an Excel Plan must be developed listing the CASORT Action numbers for the inspections that must be accomplished with an "S=Satisfactory" outcome.

A template for this MCE plan is controlled and available through the Data Quality Coordinator.

- B. Make inspector assignments and upload this plan to CASORT before proceeding with the validation flights.

### 1.9.4 FOLLOW CAAV GUIDANCE

- Follow the sample demonstration flight guidance in the AOC Administration Manual for sequencing and conduct of the validation flight sequence.
- Use the Operations and Airworthiness Inspector Manual guidance for specific inspections accomplished during the validation flight sequence.

## 1.10 SPECIAL OPERATIONS EVALUATION/VALIDATION

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It is important that the records for each of these types of programs to be consolidated for ease of historical referencing.

### 1.10.1 CASORT PROJECT NUMBER FOR SPECIAL EVALUATION

- A. A separate tracking number should be assigned and inserted into the Tracking Number list for each high-risk operation evaluation/validation
- B. This tracking number provides for the consolidation of all CASORT Action records regarding these operations.
- C. All participating inspectors will use this tracking number for any CAA Action entries relating to the specific special operations evaluation/validation.



### 1.10.2 MCE PLAN FOR VALIDATION OF EACH SPECIAL OPERATIONS AUTHORIZATION

A. Before starting the validation flight inspections an Excel Plan must be developed listing the CASORT Action numbers for the inspections that must be accomplished with outcome of—

A template for this MCE plan is controlled and available through the Data Quality Coordinator.

- 1) For evaluation actions: A=Approved; and
- 2) For inspection actions: S=Satisfactory.

B. To ensure a thorough assessment, the team should consider all Action evaluations and inspections specified in the appropriate job aids.

C. Make inspector assignments and upload this plan before proceeding with the validation of the special operations authorization.

### 1.10.3 FOLLOW CAAV GUIDANCE

Use all available CAAV guidance for these evaluations and inspections relating to the specific special operations.

The CPM may recommend the reissue of approvals related to the specific special operations as the acceptability for continued use has been confirmed.

### 1.10.4 NO OUTSTANDING ISSUES

There must not be any outstanding issues at the conclusion of the last validation flight specific to the special approval being assessed.

## 1.11 COMPLETION OF THE RE-VALIDATION PROCESS

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### 1.11.1 DOCUMENTS MUST BE COMPLIANT

- All technical documents must be determined to be compliant with applicable regulations.
- The regulations compliance checklists for Parts 6, 10, 12, 13, 14, 15, 16, and 17 must be acceptable in final.
- All technical documents must be in final with any identified issues resolved.

### 1.11.2 NO OUTSTANDING VALIDATION ISSUES

- The re-validation process cannot be concluded until all issues identified during the Validation Inspections have been resolved.
- At least one additional “no issues” inspection must be conducted to confirm the resolution of any issues identified previously during a similar inspection.

## 1.12 COMPLETED CERTIFICATION REPORT BINDER

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Follow the guidance in the AOC Administration Manual for the final certification actions phase and ensure that an Completed Certification Summary Binder is provided to the CAAV-FSS Director.

*End of Bulletin*