

## **FAA/HSAC PART 135 SYSTEM SAFETY RISK MANAGEMENT SAFETY ELEMENT 3.1.5 - CARRY-ON-BAGGAGE/CARGO JOB AID Revision 1**

The Federal Aviation Administration (FAA) is proactively moving away from compliance-based safety surveillance programs to Systems Safety Risk Management programs to eliminate air carrier's accidents and incidents. System Safety Risk Management programs were implemented with all CFR Part 121 air carriers and are now being applied to CFR Part 135 air carriers.

The FAA reached the limit of its ability of utilizing compliance-based oversight programs in 1996 for CFR Part 121 air carriers. Compliance-based oversight program repeated the same surveillance activities without identifying the actual root causes that could lead to an unsafe operating practice and/or accident. It was based on only looking at meeting the minimum standards established by the rules and regulations. To react to any identified unsafe conditions, new rules and regulations had to be enacted, which could expand over many years. The compliance-based oversight system was not effective means in reducing the causal factors that lead to air carrier operating practices and/or accidents.

System Safety Risk Management program, known as Surveillance Evaluation Program (SEP), was implemented in 2001, for CFR Part 121 air carriers to assess how an air carrier operations and maintenance organizations were operating as an integrated whole safety system. For their system to be considered safe, they have to be proactive in identifying potentially unsafe hazards and risk and mitigate it to a safe state. Safety must be built into the air carriers systems by addressing the FAA's primary seven System Elements and their associated sub-elements. Each System Element identifies questions regarding the effectiveness of that system by addressing the following topics of: Responsibility, Authority, Procedures, Control, Process Measurement, and Interfaces.

In 2004 the FAA and the Helicopter Safety Advisory Conference (HSAC) established a workgroup to assess the reasons for the increase of helicopter accidents occurring in the Gulf of Mexico and develop intervention strategies. From this workgroup two of the primary root causes of GOMEX Helicopter accidents are "Operator's not following Proper Procedures as an Operational Organization" and with "Poor Judgment/Incorrect Decisions – Operations (pilots)". These root causes resulted in the development of intervention questions for each of the applicable System Safety Attributes under System Safety Element 3.1.5, CARRY-ON-BAGGAGE/CARGO.

The primary Safety Attribute questions defined within the System Safety Element will determine if an Operator's Policies and Procedures are adequately defined in having a System Safety program; the ability to identify Risk in its daily operations; and being able to mitigate that risk to prevent the future occurrences and/or accidents.

**FAA/HSAC PART 135 SYSTEM SAFETY RISK MANAGEMENT  
SAFETY ELEMENT 3.1.5 CARRY-ON-BAGGAGE/CARGO JOB AID**

**ELEMENT SUMMARY INFORMATION**

A “YES” response to the questions means compliance with the statement or indicates the requirements were met. A “NO” response always indicates a negative response to the question and also means the requirements were not met. The air carrier is not complying with the requirements of the Safety Attribute question or the system is weak or inadequate in the area being evaluated. An explanation should always occur with a “NO” response.

**Specific Regulator Requirements (SRR):**

135.21  
135.23  
135.63  
135.65  
135.81  
135.85  
135.87  
135.100

**Other CFRs and/or FAA/Industry Guidance:**

FAA Order 8300.10, Volume 2 Chapter 74, Section 1, 2– Evaluate CFR Parts 121 and 135 (10 or more Turbine powered Aircraft) Operator’s Weight and Balance Control Program  
FAA Order 8400.10, Volume 3, Chapter 15, Section 3 – Manuals, Procedures, and Checklists – Line Station Operations  
HSAC Safety Alert (SA) 2004-01 Bill of Rights  
HSAC Recommend Practice (RP) 2004-03 Pilot Commitment

**FAA/HSAC PART 135 SYSTEM SAFETY RISK MANAGEMENT**  
**3.1.5 CARRY-ON –BAGGAGE/CARGO**  
**SECTION 1 – RESPONSIBILITY ATTRIBUTE**

**Objective:** To determine if there is a clearly identifiable qualified and knowledgeable person who is accountable for the quality of the Carry-on Baggage/Cargo processes.

*To meet the objective, the auditor will accomplish the following task:*

1. Identify the person who is responsible for the quality of the Carry-on-Baggage/Cargo process.
2. Review the description in the manual that delineates the duties and responsibilities of the person.
3. Evaluate the person’s qualifications and work experience (or resume if appropriate).
4. Review the appropriate organizational chart.
5. Discuss the Carry-on-Baggage/Cargo process with the person.

*To meet the objective, the auditor will determine and record answers to the following questions:*

1. Is there a clearly identifiable person who is reasonable for quality of the Carry-on-Baggage/Cargo processes?	<b>Yes</b> <b>No (explain)</b>
2. Does the person understand the procedures associated with the Carry-on-Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
3. Does the person understand the controls associated with the Carry-on-Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
4. Does the person understand the interfaces associated with the Carry-on-Baggage/Cargo process? Are the qualification standards (skill and knowledge) for Carry-on Baggage/Cargo clearly documented and appropriate for the duties that are assigned?	<b>Yes</b> <b>No (explain)</b>
5. Does the person understand the process measurements associated with the Carry-on-Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
6. Is the responsibility of this position clearly documented in the air carrier’s manual?	<b>Yes</b> <b>No (explain)</b>
7. Are the qualification standards for this position clearly documented?	<b>Yes</b> <b>No (explain)</b>
8. Are the qualification standards for this position appropriate for the duties that are assigned?	<b>Yes</b> <b>No (explain)</b>
9. Does the person meet the qualification standards?	<b>Yes</b> <b>No (explain)</b>
10. Does the person acknowledge that he/she has responsibility for the Carry-on-Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
11. Does the person know who has the authority to establish and modify the Carry-on-Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>

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**3.1.5 CARRY-ON –BAGGAGE/CARGO**  
**SECTION 2 – AUTHORITY ATTRIBUTE**

**Objective:** To determine if there is a clearly identifiable qualified and knowledgeable person who has the authority to establish and modify the Carry-on Baggage/Cargo processes.

*To meet the objective, the auditor will accomplish the following task:*

1. Identify the person who has the authority to establish or modify the Carry-on Baggage/Cargo process.
2. Review the description in the manual that delineates the duties and responsibilities of the person.
3. Evaluate the person’s qualifications and work experience (or resume if appropriate).
4. Review the appropriate organizational chart.
5. Discuss the Carry-on Baggage/Cargo process with the person.

*To meet the objective, the auditor will determine and record answers to the following questions:*

1. Is there a clearly identifiable person who has the authority to establish and modify the company policies for Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
2. Does the person understand the procedures associated with the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
3. Does the person understand the controls associated with the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
4. Does the person understand the interfaces associated with the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
5. Does the person understand the process measurements associated with Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
6. Is the authority of this position clearly documented in the air carrier’s manual(s)?	<b>Yes</b> <b>No (explain)</b>
7. Are the qualifications standards for this position clearly documented?	<b>Yes</b> <b>No (explain)</b>
8. Are the qualification standards for this position appropriate for the duties that are assigned?	<b>Yes</b> <b>No (explain)</b>
9. Does the person meet the qualification standards?	<b>Yes</b> <b>No (explain)</b>
10. Does the person acknowledge that he/she has authority for the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
11. Does the person know who has the responsibility for the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>
12. Are the procedures for delegation of authority clearly documented for the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>

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**3.1.5 CARRY-ON –BAGGAGE/CARGO**  
**SECTION 3 – PROCEDURES ATTRIBUTE**

**Objective:** To determine if the company has documented procedures for accomplishing Carry-on Baggage/Cargo process.

*To meet the objective, the auditor will accomplish the following task:*

1. Review the documented instructions and information related to the Carry-on Baggage/Cargo process to ensure that they contain who, what, where, when, and how.
2. Review the FAA guidance. [SRR 135.21, 135.23, 135.87]
3. Discuss the Carry-on Baggage/Cargo process with appropriate personnel to gain an understanding of the procedures.
4. Observe the Carry-on Baggage/Cargo process with appropriate personnel to gain an understanding of the procedures.

*To meet the objective, the auditor will determine and record answers to the following questions:*

1. Does the Operations Manual describe the duties for the person who will accomplish the Carry-on Baggage/Cargo process? [SRR 135.21, 135.23]	<b>Yes</b> <b>No (explain)</b>
2. Do written procedures exist to achieve the desired result of the Carry-on Baggage/Cargo process? [SRR 135.21, 135.23, 135.63, 135.65, 135.81]	<b>Yes</b> <b>No (explain)</b>
3. Does the air carrier manual define procedures for baggage handling, storage of baggage, and securing of doors prior to operation and/or during Rotor in Motion? (Equipment modifications for baggage door security status) [SRR 135.21, 135.23] [HSAC 2004-01 Bill of Rights HSAC 2004-03 Pilot Commitment]	<b>Yes</b> <b>No (explain)</b>
4. Does the air carrier manual define procedures addressing weight and balance and aircraft CG issues for each bag/cargo being loaded on the aircraft? [SRR 135.63]	<b>Yes</b> <b>No (explain)</b>

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**3.1.5 CARRY-ON –BAGGAGE/CARGO**  
**SECTION 4 – CONTROL ATTRIBUTE**

**Objective:** To determine if checks and restraints are designed into the Carry-on Baggage process to ensure a desired result is achieved.

*To meet the objective, the auditor will accomplish the following task:*

1. Review the documented instructions and information related to the Carry-on Baggage/Cargo process.
2. Review FAA Guidance. [SRR 135.63, 135.87]
3. Discuss the Carry-on Baggage/Cargo process with appropriate personnel to gain an understanding of the controls.
4. Observe the Carry-on Baggage/Cargo process to gain an understanding of the controls.

*To meet the objective, the auditor will determine and record answers to the following questions:*

1. Are the following checks and restraints built into the Carry-on Baggage/Cargo process: 1.1 Does a crewmember conduct a walk around to ensure proper stowage of carry-on baggage prior to aircraft departure? 1.2 Does the pilot-in-command conduct a final security check prior to takeoff and landing? 1.3 Does the air carrier have a process for delegation of duties when personnel shortages exist in order to ensure compliance with its carry-on-baggage program? 1.4 Does the air carrier have a process for ensuring the loading and security of Carry-on Baggage/Cargo during Rotors-In-Motion operations?	<b>Yes</b> <b>No (explain)</b>
2. Do the checks and restraints ensure the desired result is achieved for the Carry-on Baggage process?	<b>Yes</b> <b>No (explain)</b>
3. Does the air carrier have a documented method for assessing the impacts of any changes made to checks and restraints in the Carry-on Baggage/Cargo process? [SRR 135.81]	<b>Yes</b> <b>No (explain)</b>
4. Are procedures defined in the manual for how supervisory personnel are held accountable for unsafe acts?	<b>Yes</b> <b>No (explain)</b>
5. Does the air carrier have the resources to support the checks and restraints for the Carry-on Baggage/Cargo process?	<b>Yes</b> <b>No (explain)</b>

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**3.1.5 CARRY-ON –BAGGAGE/CARGO**  
**SECTION 5 – PROCESS MEASUREMENT ATTRIBUTE**

**Objective:** To determine if operator measures and assesses the Carry-on Baggage/Cargo process to identify and correct problems or potential problems.

*To meet the objective, the auditor will accomplish the following task:*

1. Review the documented instructions and information related to the Carry-on Baggage/Cargo process.
2. Discuss the Carry-on Baggage/Cargo process with appropriate personnel to gain an understanding of the controls.
3. Observe the Carry-on Baggage/Cargo process to gain an understanding of the controls.

*To meet the objective, the auditor will determine and record answers to the following questions:*

1. Does the air carrier’s Operational Control processes include the following Process Measurements?	
1.1. Does the air carrier document their Process Measurement methods and results?	<b>Yes</b> <b>No (explain)</b>
1.2. Does the air carrier audit process define the decision-making process for action plans to mitigate the identified Hazards and Risk?	<b>Yes</b> <b>No (explain)</b>
1.3. Does the air carrier take corrective actions to the Procedures or Control Attributes in response to identified Hazards/Risk discovered during the audits?	<b>Yes</b> <b>No (explain)</b>
1.4. Does the air carrier re-evaluate the corrective actions to determine the following; the original hazard, consequence, severity and likelihood have been mitigated effectively?	<b>Yes</b> <b>No (explain)</b>
1.5. Does the air carrier conduct an independent audit of the Carry-On-Baggage/Cargo program at least biannually to ensure that it meets its intended function (conducted by person outside the responsibility of carry-on-baggage/cargo program)?	<b>Yes</b> <b>No (explain)</b>
1.6. Does the air carrier conduct at least 20% of its audits in a random, unannounced fashion?	<b>Yes</b> <b>No (explain)</b>
2. Does the air carrier conduct audits to assess compliance with the required Carry-On-Baggage/Cargo procedures defined under Procedures Attributes?	<b>Yes</b> <b>No (explain)</b>
3. Does the air carrier conduct audits to assess compliance with the checks and restraints identified under Control Attributes?	<b>Yes</b> <b>No (explain)</b>
5. Does the company retain the records that reflect their Risk Analysis of Hazards and the how the risk was mitigated?	<b>Yes</b> <b>No (explain)</b>
6. Does the Process Measurement methods appear to be affective?	<b>Yes</b> <b>No (explain)</b>
7. Does the air carrier use their Process Measurement results to improve their programs?	<b>Yes</b> <b>No (explain)</b>
8. Are the Process Measurement results accessible to the FAA?	<b>Yes</b> <b>No (explain)</b>
9. Does the organization that conducts the process measurement have direct access to the person(s) with the responsibility and authority for the Carry-On-Baggage/Cargo processes?	<b>Yes</b> <b>No (explain)</b>
10. Does the air carrier have the resources to support the Process Measurement for the Carry-On-Baggage/Cargo processes?	<b>Yes</b> <b>No (explain)</b>
11. Were all observations unrelated to the Process Measurement satisfactory?	<b>Yes</b> <b>No (explain)</b>

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**SECTION 5 – PROCESS MEASUREMENT ATTRIBUTE**

12. Best practices/favorable comments:

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**SECTION 6 – INTERFACES ATTRIBUTE**

**Objective:** To determine if operator identifies and manages the interactions between the Carry-on Baggage/Cargo process and the other element processes within the operators organization.

*To meet the objective, the auditor will accomplish the following task:*

1. Review the documented instructions and information related to the Carry-on Baggage/Cargo process.
2. Discuss the Carry-on Baggage/Cargo process with appropriate personnel to gain an understanding of the controls.
3. Observe the Carry-on Baggage/Cargo process to gain an understanding of the controls.

*To meet the objective, the auditor will determine and record answers to the following questions:*

*Are the following interfaces identified for the Carry-on Baggage/Cargo process:*

1. MEL/CDL/Deferred Maintenance	<b>Yes</b> <b>No (explain)</b>
2. Weight and Balance Program.	<b>Yes</b> <b>No (explain)</b>
3. Training Program	<b>Yes</b> <b>No (explain)</b>
4. Pilot Operating Limitations/Recent Experience	<b>Yes</b> <b>No (explain)</b>
5. Maintenance Control	<b>Yes</b> <b>No (explain)</b>
6. Operations Specifications	<b>Yes</b> <b>No (explain)</b>
7. Carriage of Cargo	<b>Yes</b> <b>No (explain)</b>
8. Safety Program	<b>Yes</b> <b>No (explain)</b>
9. Station Facilities	<b>Yes</b> <b>No (explain)</b>
10. List any additional interfaces identified:	<b>Yes</b> <b>No (explain)</b>
11. Are there written procedures for the use of air carrier personnel in the application of these interfaces?	<b>Yes</b> <b>No (explain)</b>
12. Are there controls to ensure that interfaces occur?	<b>Yes</b> <b>No (explain)</b>
13. Are the interfaces between the Carry-on Baggage/Cargo process and other processes treated consistently in the Manual(s)?	<b>Yes</b> <b>No (explain)</b>