

Integrated Pilot Project Plan for the Manufacturer's Safety Management System (MSMS) Pilot Project

Revision 31



Purpose:

The purpose of this document is to define the work required to implement and execute a series of pilot projects to introduce a Safety Management System (SMS) with aviation Design and Manufacturing (D&M) organizations. This document outlines the timelines, actions and activities necessary to launch the Manufacturer's SMS (MSMS) pilot project.

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1 Introduction

1.1 Purpose

This Integrated Pilot Project Plan (IP3) is used to describe the proposed implementation of a Safety Management System (SMS) pilot project with aviation Design and Manufacturing (D&M) industry. This document outlines the timelines, actions and activities necessary to launch the Manufacturer's SMS (MSMS) pilot project. This plan is a living document and will be updated when necessary.

1.2 SMS Background

A MSMS pilot project is being conducted to learn more about SMS and how it can be applied to design and manufacturing organizations. The pilot project is voluntary. Several organizations that have volunteered to implement an SMS during the pilot project will implement their SMS with the same FAA requirements that may eventually become mandatory. The implementation phase provides FAA Aircraft Certification Service (AIR) and industry with an opportunity to learn, gain experience, and share information within a voluntary environment. The pilot project will also allow the FAA AIR an opportunity to refine its evaluation and oversight processes before mandating SMS.

The pilot project will enable FAA AIR to initially define SMS applicability to current Type Certificate (TC) and Production Certificate (PC) holders, new applicants for these certificates and it is anticipated that Part Manufacture Approval (PMA) and Technical Standard Order Authorization (TSOA) holders will be included. The pilot project will collect certain information needed to determine the applicability and scalability of a manufacturing organization SMS rule. As we learn more during the SMS pilot project with manufacturing organizations, we will determine the SMS applicability decision for the types of design and production organizations that will be affected.

Many aviation design and manufacturing organizations have existing, mature and effective safety systems/programs and company processes such as Quality Management System (QMS), internal audit quality assurance programs, continued operational safety programs, and certification processes consistent with existing regulations. Implementation of SMS should complement and enhance those effective systems, and not add unnecessary burden that does not have commensurate safety benefit. The scope of SMS requirements should be limited to hazards associated with the design and manufacture of an aircraft or that could affect the safety of aircraft operations. Such a hazard is a condition that can lead to death or serious injury or substantial damage to an aircraft during aircraft operations with the intention of flight. It is not simply any hazard that can lead to injury, illness or death to people; damage to or loss of a system, equipment, or property; or damage to the environment.

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Organizations with the highest risk “should” or will be required to implement SMS first. Subsequent timing of implementation for remaining organizations “should” or will be phased-in based on risk, with the lowest risk organizations required to have their SMS last.

Both industry and FAA must understand whether and how to impose SMS requirements on small organizations, organizations responsible for out-of-production aircraft or small fleet sizes, holders of Restricted Category Type Certificate(s), and aircraft used in commercial vs non-commercial operations.

1.3 Definitions

- MSMS IP3 - Manufacturing Safety Management System Intergraded Pilot Project Plan using Microsoft Office™: Project™ and Word™.
- D&M – design and manufacturing organizations.
- Participants – Type Certificate (TC) and/or Production Approval Holder (PAH), Technical Standard Order Approval (TSOA) organizations, that have volunteered to participate in the MSMS pilot project study.
- D&M SMS Pilot Project Guide (The Guide) – A guide developed by the MSMS team that includes:
 - D&M SMS Framework,
 - Guidance material for the D&M SMS framework,
 - Assessment and oversight processes,
 - Pilot project planning processes
- See Definitions document for a fuller explanation of terms and definitions.

2 Pilot Project Objectives

The MSMS pilot project team, have identified five objectives for conducting the SMS pilot project:

1. Provide feedback to AIR rulemaking activities needed to implement SMS;
2. Develop and validate the draft D&M SMS framework;
3. Develop and validate the draft guidance material;
4. Collected information that will assist in the determination of applicability and scalability [which companies will be required to implement] of a SMS rule for D&M organizations; and
5. Develop draft D&M SMS assessment and oversight processes and tools.

3 Pilot Project Planning

3.1 Schedule and Timeline

The pilot project schedule is to include: start/end dates, tasks with duration and resources (people/costs), checkpoints/interim review dates, due dates and milestones for MSMS project deliverables.

The schedule and timeline are maintained using MS Project™ software (the file is titled “*MSMS IP3_date*”). Specific meeting dates will be maintained in the MSMS Pilot Project Matrix (excel file).

3.2 Pilot Project Duration

The pilot project is currently expected to run for 18 months, from the launch of the first pilot project, in January 2011.

3.3 Project Planning

3.3.1 Tasks

The Pilot Project Planning (PPP) Sub-team has identified several pilot project planning objectives in order to meet the overall FAA AIR pilot project objective. Under each planning objective is a set of tasks required to fulfill the objective. The completion of the planning tasks are identified and tracked in the *MSMS IP3* file.

3.3.2 Deliverables

Task deliverables and milestones to support the pilot project plan are identified and tracked in the *MSMS IP3* file.

3.4 Detailed Participant Schedule and Timeline

A detailed participant schedule and timeline will be maintained on the MSMS Pilot Project Tracking Matrix (Microsoft Excel™ file).

The MSMS Team Lead and/or MSMS Pilot Project Lead (PPL) will coordinate with the participants (companies) to determine their desired interest and commitment.

The launch or kick-off meeting date will be agreed and recorded in the MSMS pilot project tracking matrix, under the participants section of the schedule.

Companies that no longer wish to participate in the pilot project will be removed from the schedule. A substitute participant will be selected from the backup list. They will then be contacted to determine their level of interest to participate and their availability.

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Roles and Responsibilities

3.5 MSMS Pilot Project Team Roles and Responsibilities (FAA)

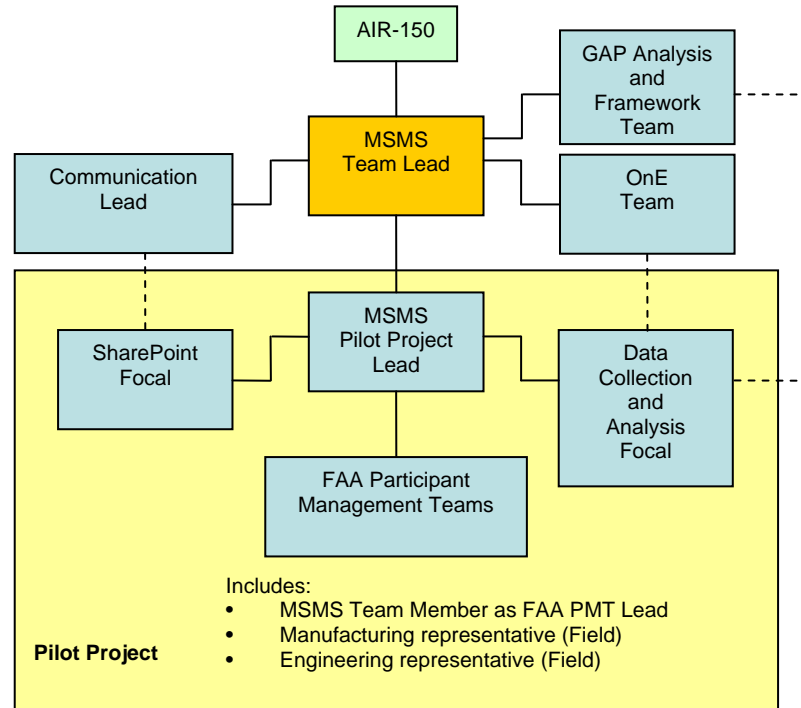


Figure 1 MSMS Team Organizational Chart

3.5.1 MSMS Team Lead

Leader of the MSMS team. Provide vision and direction to the MSMS team.

3.5.2 MSMS Leadership Team

Leadership for MSMS and sub-teams. Provides policy and guidance on SMS requirements and processes.

3.5.3 MSMS Team

Personnel from AIR, DOT, and consultant organizations that helped develop a prototype SMS framework, policy, guidance, and training requirements for D&M organizations.

3.5.4 MSMS Pilot Project Lead (PPL)

Lead and coordinator for the FAA Participant Management Teams. Responsible for the following:

- Coordination and management of the FAA Participant Management Teams (FAA PMT).
- Maintaining the MSMS Pilot Project Tracking Matrix and schedule.

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- Provide feedback to PMTs about decisions made at the MSMS leadership level.
- Updating the MSMS IP3 plan.
- Determine when some PMT Lead responsibilities can be transitioned to FAA Field Office personnel.
- Final acceptance for progression to the next step/level of SMS maturity. Progression recommendations come from FAA PMT members and FAA PMT Lead.
- Development of standardized outreach information for SMS.
- Data Collection and Analysis focal. Develop list of specific data to be collected during the Pilot project. This includes time spent to accomplish specific gals/tasks, costs involved, travel, time spent on site with participant, etc. Development of a database and process to input, store, access and catalog received data. Development of a process for analyzing the data and create output methods (charts/narrative) for users to review the data.
- Provide status/updates to Senior FAA Management throughout the pilot project period of performance.
- The production of the lessons learned report.

3.5.5 FAA Participant Management Team (PMT)

PMT is responsible for participating in the orientation and assessment meetings. Will review the participant's gap analysis, implementation plan, SMS procedures and processes and assess the participant's accomplishment at each level of the SMS implementation.

The PMT consists of the following FAA personnel:

- Two people from the MSMS team - a lead and support member;
- One to two ASI(s) from the geographical MIDO/CMO/MISO; and
- One to three ASE(s) from the geographical ACO/BASOO/GASOO.

3.5.6 FAA Participant Management Team Lead (PMT Lead)

A PMT Lead will be selected from the MSMS Team. The PMT Lead coordinates all formal interaction with the participant, to include: meetings, telecons, reviews for step/level progression, etc.

The PMT Lead will also:

- Provide direction and guidance to the PMT.
- Develop a communication process with participant; determine how communication will take place (telephone, email, letters, etc.).
- Maintain a schedule of meetings / telecons / target / goals.
- Provide assistance, as requested, to the participant.
- Participate in meetings with the participant, if requested.
- Review the participant's implementation plan and other documents and provide objective input.
- Discuss the requirements of exit criteria for all maturity phases of SMS implementation with the participant.

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- Receive pilot project inputs from both the participant and assessment (oversight) organization (include ACO, MIDO, CMO, etc.).
- Collect data required for Pilot Project Data Analysis, document lessons learned.
- Coordinate with MSMS PPL for information, guidance, direction and executive visits.
- Provide status/updates to the PPL throughout the Pilot Project.

3.5.7 FAA Field Office Personnel

The FAA Field Office Personnel include, but are not limited to: ASI, ASE, Flight Test pilot or engineer. Office managers will provide the PPL the names of proposed PMT members. The MSMS leadership team must agree to the names before the names are added to the MSMS Pilot Project Tracking Matrix. The PPL / MSMS team lead will solicit names from office managers.

Personnel assigned to the PMT will receive direction and guidance from the PMT Lead. Initially field office personnel will provide comments only on participant produced processes, procedures, etc. They will have no authority to accept outputs from participants as this task is for the MSMS PMT Lead. Field personnel will review processes and procedures prior to forwarding (with comments) to the FAA PMT Lead. The PMT Lead will review and forward to the PPL (with comments/recommendation). As field personnel experience and confidence increases, they may be granted more authority, by the PPL.

Field office personnel assigned to the PMT are responsible for the following:

- Complete all SMS training requirements;
- Provide status/updates to their office management throughout the pilot project;
- Provide assistance, as requested by the PMT Lead throughout the pilot project;
- Participate in PMT meetings/telecons;
- Participate in participant meetings/telecons and site visits;
- Assist in the review the participant's implementation plan and other documents and provide objective input; and
- When requested by the PMT lead assess the SMS procedures, processes and provide comments to the PMT Lead.

3.5.8 Certificate Management (CM)

SMS pilot project should not interfere with the ASIs CM responsibilities. CM responsibilities will continue to be performed by the ASI assigned to the PAH. Any changes, additions to a PAH's FAA approved QC or FIS system will continue to be processed and approved in accordance with FAA Order 8120.2 and office policies. However, any SMS procedures and processes that come under the FAA approved QC system will also be reviewed by the PMT in accordance with this plan and the D&M SMS Pilot Project guide. Any changes or recommendations to the companies P&P that come under the FAA approved quality system must be equally agreed to between the PMT and PI.

PI audits/ACSEP/TC/STC projects will continue to be managed by the MIDO and ACO personnel per existing procedures.

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Repair station procedures/documents. In addition to the above QC system some participants may include their SMS procedures and processes into FAA approved/accepted documents such as maintenance manuals (e.g. GOM, GMM, etc.). FAA Notice 8900.133, section 5 states: "If an operator desires to include SMS material or content into its accepted or approved company manuals, the [Flight Standards] SMS Program Office recommends the following clarifying statement be placed in either the signature stamp, and/or approval/acceptance letters. The SMS Program Office requests the service provider put the statement on the front cover of the subject manual: *"[Approval/Acceptance] of this [manual/document/procedure] does not constitute approval or acceptance of any part, process, element or component of [the organization's] SMS."*

3.5.9 SharePoint / Web Focal

Pilot Project specific tasking - The SharePoint Focal will develop or co-develop the SharePoint (or similar) data sharing vehicle. They will also manage the system and maintain it to ensure validity, currency and accessibility. The SharePoint site will include at minimum include: FAQ's, lessons learned, documentation, guides, tools, etc.

Share Point revisions - Revisions to guidance material, tools, etc, are uploaded to the Sharepoint site by the Sharepoint focal after revisions are reviewed and concurred with applicable MSMS teams (PPP, OnE, GAF). Changes to the Guide should be limited and each revision will contain bulk changes. The DG was designed to be changed more frequently as lessons and feedback are received. The DG is a living document and can be changed more frequently than the Guide. However the frequent revisions will be uploaded to the Sharepoint site (not the Web site) so the POCs can have the latest information to help develop their SMS system.

FAA SMS Web Site revisions – Revisions to guidance material, tools, etc, are uploaded to the FAA SMS web page by AIR-150 Web focal. MSMS leadership team must review and agree to revisions before they are uploaded to the FAA's SMS Web site. It is anticipated that changes to documents and tools available to the general public will be made in bulk revisions and the frequency of uploading the revisions to the FAA SMS web page will be limited.

Manufacturers SMS Share point will have four levels of workplace navigation tabs for managing the MSMS Pilot Project. A listing of persons having access to share point will be maintained by the PPL.

- Level one tab (top level) is titled "Manufacturers SMS" - Use by the MSMS team for managing the pilot project working files. Access is restricted to MSMS team and is for internal FAA use only.
- Level two tab is titled "Pilot Project" - Use by all the PMTs and the MSMS team for sharing pilot project guidance and tools and other data. Access is restricted to PMT, MSMS team and is for internal FAA use only.

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- Level three tab is titled “D&M SMS Pilot Project General Info” - Use by the PMT and participant POC for sharing pilot project guidance and tools that is not company specific and not proprietary. Access is restricted to PMTs, MSMS team, all POCs and is external to the FAA.
- Level four tab (bottom level) is titled by each “Company Name” - Use by the PMT and participant POC for sharing data between the company and the PMT. This level also contains company specific and proprietary information. Access to each workplace tab is restricted to the participant's POC and the PMT assigned to the company and is external to FAA. Each company has their own workplace tab and they are restricted from accessing another company workplace tab.

If SharePoint system is down for an extended period of time the PMT lead will be responsible to coordinate and manage and maintain data by email and will status the PPL until SharePoint is back on line.

3.5.10 Data Collection and Analysis Focal

The Data Collection and Analysis Focal will be responsible for the:

- Development of a list of specific data to be collected during the pilot project.
- Development and maintaining a database and process to input, store, access and catalog received data.
- Development of a process for analyzing the data and create output methods (charts/narrative) for users to review the data.

3.6 Participants (Industry)

3.6.1 Participant SMS Point of Contact (POC)

This individual represents the participant organization, as SMS Project Manager (or similar) and acts as the SMS Point of Contact (POC) for their SMS activities. This POC will be the primary contact for the FAA and the FAA PMT Lead.

During the initial implementation of SMS, they will coordinate with the FAA PMT to develop a useable and realistic communication process for the FAA PMT. The Participant POC is expected to manage and report on the status and momentum of the participant organizations execution of the SMS Implementation Plan. Difficulties, roadblocks or slowdowns must be reported to the FAA PMT so alternative solutions can be implemented.

4 Pilot Project and Data Management

4.1 Project Management

4.1.1 Introduction

MSMS pilot project tracking matrix (excel file) will be used to track and coordinate the initiation and on going progress of the pilot project. The matrix will include names of participants, names of FAA team members and leads, meeting / site visit dates, exit level dates, etc. At the beginning the log will contain specific categories of information as described above and as the project progresses other categories can be added.

Project information / data will be collected and shared on the MSMS SharePoint site. <https://avssharepoint.faa.gov/air/AIRCert/air1/safemgt/prequal/default.aspx> .

All information / data loaded on share point will be maintained on server i.e. LAACO network drive (O:) Laaco '10.8.48.30\Office' file name MSMS pilot?)

MSMS Share point site and/or FAA website will be setup to allow each industry participant to place deliverable documentation in their own file location protected from viewing from other participants. Only selected FAA users will have access to view all participant information.

4.1.2 PMT

Each PMT lead will follow this IP3 plan and the guidance in the D&M SMS Pilot Project Guide (referred herein as The Guide). A PMT Lead will lead each Participant Management Team (PMT) during the pilot project and during the assessments. Assessments and level progression will be conducted using "The D&M Guide". Progression levels will be recommended by the PMTL and reviewed by the MSMS leadership team before progression to the next level is given.

PMT meetings/telecons - The PMT lead will determine if and when PMT team meetings / telecons are needed. As a minimum the PMT should hold a telecon at least quarterly.

As the pilot project progresses we anticipate that field office PMT members will gain knowledge of SMS processes so PMT Lead responsibilities may be delegated to them. However the PMTL is ultimately responsible to manage the pilot project for this assigned participant until the completion of the pilot project. It is also possible that some PMT Lead responsibilities may not be delegated to field office PMT members depending upon the circumstances and team dynamics. PMTL are to consult with the MSMS leadership before delegating. The PMT members will follow the responsibilities outlined in section 3.5 above.

4.1.3 Configuration Management (CM)

Configuration Management and revision control will be maintained on all data files and documentation used within the pilot project. The PPL will ensure data loaded on share point has revision control.

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4.1.4 Frequently Asked Questions (FAQ)

Frequently Asked Questions (FAQs) will be developed and maintained on the FAA only SharePoint site and industry participant website.

4.1.5 Sustaining Efforts – Post Completion of Pilot Project

It is anticipated that SMS implementation will continue after the pilot project has been completed. Participants will still require continued interaction and guidance from their local assessment/oversight office(s). Until an FAA Order and Advisor Circular (AC) are released, the local Field Offices will continue to D&M SMS Guidance Material to transition the participants through the various SMS levels.

Note: As we learn more this part of the plan will be updated.

4.2 Meetings and Assessments

4.2.1 Orientation Briefings

The following will constitute the launch or SMS kick-off meetings:

1. General D&M SMS briefing to ACO and MIDO Office personnel;
2. Orientation briefing to local FAA Field Office personnel assigned to the Participant Management Team (PMT);
3. Orientation briefing to the industry participant.

4.2.2 Preparation Prior to Orientation Meetings

1. A “pre-pilot-orientation meeting checklist” in appendix A will be used by the PMT lead to plan and coordinate the orientation meetings.
2. The PMT Lead makes arrangements for the PMT pre-brief by making a courtesy call to the ASI and ASE to answer any questions they might have prior to the pre-orientation meeting telecom. Office managers are encouraged to attend the orientation meetings. Other ASIs and ASEs may attend as agreed upon by the PMT Lead and office managers. All CMT questions and concerns should be addressed during the Pre-brief meeting.
3. At least 60 days prior to the pilot project orientation meeting the PMT Lead will send the D&M SMS information package (defined below) to the participant (company) to prepare for attending the orientation meeting. A sample letter / email will be provided by the team lead to the participant. (see appendix B).

D&M SMS Information Package for participants:

- Orientation Briefing materials (Send Executive, Part 1 and Part 2)
- D&M SMS Pilot Project Guide (referred to “The Guide”)
- Developmental Guidance for D & M SMS
- Gap Analysis tool.

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4. At least 60 days prior to the pilot project orientation meeting the PMT Lead will send the D&M SMS information package (defined below) to the new PMT members.

D&M SMS Information Package for PMT members:

- a. Orientation Briefing materials
 - b. D&M SMS Pilot Project Guide (referred to "The Guide")
 - c. Gap Analysis tool.
 - d. System Description Hazard ID process for Mfg Org
 - e. New team member packet
5. The PMT Lead will request the participant to perform the preliminary gap analysis prior to the orientation meeting with the PMT. Participants are to read the material in advance and give their best effort to complete a draft preliminary gap analysis prior to the first meeting.
 6. The PMT Lead will hold a pre-orientation meeting telecom with the local FAA Field Office and participant to explain the following items:
 - Orientation meeting agenda, expectations and outcomes.
 - Ask the participant to review the orientation briefing (PowerPoint™ slides) in preparation of the orientation meeting.
 - Purpose of "The Guide".
 - Use of the preliminary gap analysis tool.
 - Inform the POC that the FAA expects the company to have their executive level management attend the 4 hour SMS briefing on the first day.
 - The company also must have departmental / organizational Subject Matter Experts to participate in the two day preliminary gap analysis meeting. Discuss the company POC, the personnel that are needed to attend the briefing and the preliminary gap analysis meeting.
 - Explain the need for the participant to identify their system description prior to completing their preliminary gap analysis. Go over the System Description material.
 5. After conducting the orientation briefings the PMT Lead will initiate the system description and analysis discussion with the participant. At the completion of the system analysis, the preliminary gap analysis discussion will be conducted. Add a discussion about how to conduct and agree upon a system description.
 6. The preliminary gap analysis orientation session will be facilitated by the PMT Lead. Using the gap tool the PMT lead will explain each component, element and process. The PMT lead will ask the participant where they have documented procedures and processes and then fill in the preliminary gap tool.

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4.2.3 Post Orientation Meeting

The week after the orientation session a MSMS telecon will be scheduled to follow-up on lessons learned and comments received on the feedback form. Actions will be assigned to MSMS team members to address the lessons learned items and feedback. The lessons learned and feedback will be maintained tracked.

Within 14 days the PMT lead will write a Post Orientation letter to the company thanking them for their participation see example in appendix B.

Within 2 weeks the PMT lead and the company POC will develop a schedule of meetings and telecons where the FAA would assist in the Gap analysis and implementation plan development.

4.2.4 Ongoing PMT & Participant Meetings and Assessments

On-going meetings/telecons - It is expected that each PMT will meet / hold a telecon with their industry participant on a monthly or biweekly basis to discuss the progress of the Gap analysis and the Implementation Plan. The PMT should provide assistance to the participant using the Developmental Guidance (DG) for interpretation of the Framework, the SMS Guide, the IP3 plan and guidance received from the MSMS leadership team. Examples of SMS outputs, tools, processes, best practices, that are developed during the pilot project and accepted by the MSMS leadership may be sent to a participant to help them develop an SMS system.

As a minimum a quarterly face to face meeting with the participant to discuss their progress is required. The PMT lead and the participant POC will determine if interim meetings / telecons are needed. The type and frequency of meetings are at the discretion of the PMT lead.

Level assessment meetings -The PMT must visit the company for each of the level assessments.

Assessment visits - The PMT may visit the company to assess of any D&M SMS procedures / processes identified by the company as meeting the SMS framework. Assessment will be done IAW with "the D&M Guide".

Meeting, telecon and site visit preparation - PMT Lead will plan and prepare all SMS site visits, meetings and telecons with the participant POC on behalf of the PMT. PMT lead is to define specific local office and PMT lead interaction points with the participant. This will include but not be limited by the following:

1. Prepare and maintain a Plan/schedule of all face to face meetings, telecons, and site visits with the participant.
2. Coordinate dates, time, location (address) with the participant and PMT members. Email is the preferred communication method;
3. Have an agenda for each meeting, telecon and site visit;
4. Confirm the point of contact at the facility you will be visiting;
5. Determine facility access information (security, safety shoes, eye protection, etc.);
6. Ensure budget for the FAA team members is provided by AIR-150;

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7. Act as, or request a facilitator to support formal D&M SMS site visits and meetings between the participant, and the PMT.
8. PMT Lead will request the capture of lessons learned at each major review and meeting using the MSMS book of questions.
9. Ensure minutes of the meetings are recorded and add a copy to sharepoint under the participant file.
10. Discuss hazard identification and provide examples when available.
11. PMT Lead will identify PMT member interaction points.

4.2.5 PMT Lead Meetings

The PMT leads and the MSMS leadership will have a telecom twice a month to discuss the progress of their companies SMS progress. Standardization and key issues will also be discussed and addressed. Discuss hazard identification and provide MSMS examples in the first several meetings / telecons with the participant.

Key Issues Posted on the MSMS sharepoint site is a listing of Key Issues associated with the SMS pilot project. The Key Issues come from the MSMS team and the list will be revised periodically. It is expected that each PMT will become familiar with the Key Issues and will not make any formal decisions related to these Key Issues until they are brought up to the MSMS team for discussion feedback. Because the MSMS pilot project is being conducted to learn more about SMS and how it can be applied to D&M organizations, standardization, process improvements, etc are the motive for addressing Key Issues throughout the pilot project.

If an issue arises that fall within the categories or topics on the Key Issue listing the PMT is expected to follow these steps:

STEP 1: Discuss with the participant and gain information from the participant's point of contact on the issue and the participant's perspective

STEP 2: PMT doesn't provide a direct answer, but rather moves to the next step

STEP 3: PMT Leader documents the issue and sends to PPL

STEP 4: PPL and other leadership reviews, discusses, and formulates how to address the issue. The responses will be recorded on the key issue listing and if applicable addressed in the other SMS documents.

STEP 5: PPL and other leadership informs PMT Leader on how to respond to the Participant's concern or issue

STEP 6: PMT Leader contacts Participant and provides the response

4.2.6 Quarterly MSMS Team Meetings

As a minimum, the MSMS team will meet quarterly to discuss the progress of the pilot projects. An agenda with meeting expectations and outcomes will be coordinated prior to each meeting.

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4.2.7 Workshop and Focus Group

A D&M SMS workshop or focus group maybe organized and held at least once a year between FAA AIR and participant and industry.

4.3 Communication between the PMT and Participant

The intent of a formal communication process is to maintain a consistent AIR MSMS message. Formal communications / decisions between the participant and the PMT will be through the PMT lead and the participant SMS POC. Formal decisions will be in writing (Email) for standardization and retention purposes. Formal communications are deviations, clarifications (interpretation), improvements concerning the gap analysis/tool, SMS framework, FAA D&M guide will be coordinated though the PMT Lead and the Pilot Project Lead to maintain standardization. The PPL will consult with the MSMS leadership team for an official response.

The MSMS Leadership team provides policy and guidance on internally and externally oriented SMS requirements and interfaces.

Communication between team members and the participant may occur for technical discussions with PMT lead concurrence.

4.4 Training & Briefing Material

4.4.1 PMT Training

It is proposed that all PMT members will have completed the training courses detailed below, prior to their participation in the pilot project.

1. 5-day ICAO SMS training course offered by MITRE, and
2. FAA eLMS SMS training courses.
3. New team member packet
<https://avssharepoint.faa.gov/air/AIRCert/air1/safemgt/prequal/New%20Team%20Member%20Packet/Forms/AllItems.aspx>

4.4.2 Briefing Material Development

The following briefings will require the development of presentations and briefing materials to enable them to be conducted:

1. Train the PMT Leads to the list of tasks – PMT Lead Training Presentation kit on how to deliver orientation material, roles & responsibilities etc.;
2. Orientation and briefing for FAA local Field Office PMT members;
3. Orientation briefing for the launch / kickoff meeting with the participant.

4.5 Tools & References

4.5.1 Tools

The following tools will be developed to enable the pilot project to be conducted and the necessary data collected, stored, tracked and analyzed:

1. Preliminary Gap Analysis tool – A tool used by the participant to conduct a preliminary analysis and assessment of their existing programs, systems, processes, and activities with respect to the SMS *Framework*.
2. Detailed Gap Analysis tool - A tool used by the participant to conduct a detailed analysis and assessment of their existing programs, systems, processes, and activities with respect to the SMS *Framework*.
3. D&M SMS Pilot Project Tracking matrix.
4. Data Collection and Analysis tool – **Excel file in the tracking matrix and Access data base**
5. Participant D&M SMS survey ('s) – **Survey form**
6. Lessons Learned database – **Access Data base and the Gap tool**
7. Pre-pilot-orientation meeting checklist

Integrated Pilot Project Plan for Manufacturer's SMS

4.5.2 References

Design & Manufacturing (D&M) Safety Management System (SMS) Pilot Project Guide (The Guide) is a consolidated document containing the following items:

- Developmental Guidance (DG) for interpretation of the Framework, and
- Information from this IP3 Narrative.

4.6 Information and Data Sharing

4.6.1 Introduction

To enhance aviation safety by using safety risk management, there must be a free flow of safety ideas and information within certificate holders, between certificate holders and the authorities, and throughout the industry responsible for design, manufacture, maintenance and operation of aircraft.

Implementation of a safety management system can only be successful if safety information is protected from inappropriate use. There is no D&M SMS without the development, documentation and sharing of safety information. Protection is essential to ensure the availability of such information to enhance safety.

4.6.2 Purpose

To ensure that FAA AIR employees understand:

- That a regulated entity's participation in FAA AIR's D&M SMS pilot project is completely voluntary therefore safety information they provide under this program should be treated as voluntarily submitted information as long as it meets established disclosure criteria.
- How to address potential violations that may be disclosed under this pilot project, and,
- How to protect voluntarily submitted SMS information from improper disclosure within and outside the FAA.

These protections and procedures will encourage regulated entities to participate in the D&M SMS Pilot Project which is a goal that is consistent with the FAA's safety and security responsibilities.

4.6.3 Disclosure and Enforcement of Violations

Any discovery of an apparent violation arising from the D&M SMS pilot project should be treated as voluntarily submitted information??

In such cases, FAA AIR employees working the D&M SMS pilot project should direct the regulated entity to contact the appropriate principal inspector or other authority and disclose their safety information. The inspector/authority will then address the issue.

Integrated Pilot Project Plan for Manufacturer's SMS

Exclusions to the above findings of apparent violations include scenarios where the:

- Regulated entity informs the FAA of the possible violation during, or in anticipation of, an FAA investigation/inspection or in association with an accident or incident. [AC-00-58B p. 4];
- Safety finding is part of a pattern of repeated violations; and
- Safety finding could cause the safety case to be reopened.

4.6.4 Improper Disclosure of Information by FAA

The FAA will exercise due diligence to ensure that company proprietary or sensitive information is not shared with those who do not have a need to know. However, we are bound by the following policies:

- *Sharing of de-identified information* The FAA may disclose de-identified, summarized information that may help explain the need and approach to developing regulations;
- *Freedom of Information Act.* – SMS information is not protected from disclosure under FOIA (unless it is protected by Part 193);
- *Disclosure within the FAA.* The FAA should only disclose a regulated entities SMS information with others who do not have a need to know the information to address SMS polices or safety issues; and
- *Not Protected Under Part 193.* The information is not designated as protected until it is afforded the protections under Part 193.

Notes: Part 193 Status AVP is working on an ANPRM. Linda has the action item to track status.

4.6.5 Related References

1. 14 CFR Part 193 – Protection of Voluntarily Submitted Information;
2. Voluntary Disclosure Reporting Program, FAA Advisory Circular 00-58B;
3. Designation of Voluntary Disclosure Reporting (VDRP) Information as Protected from Public Disclosure Under 14 CFR Part 193.

5 General FAA and Industry Communications Plan

A separate Communications Plan will be developed by the Communication Focal. It will plan, develop and deliver general SMS briefings to inform FAA offices and industry not included within the pilot project.

Part of the general communication plan is to have an MSMS team member brief SMS to the local ACO and MIDO office personnel who are not participating in the Pilot project. A general presentation will be given to the local ACO and MIDO offices on the day prior to meeting with the PMT and the pilot participant. Specific details are in the MSMS Communication plan.

PMT and participant orientation briefings are addressed separately in this IP3 plan.

6 Data Collection and Analysis Process

The data collection process begins with the identification of data marked for collection. For the D&M SMS Pilot Project the data is to be used to demonstrate that the pilot study objectives are being achieved. A data collection methodology will be developed to determine the type and kind of data to be collected during the SMS pilot project. Specific data will be collected during the course of pilot project to support the pilot project high level objectives. The data collection process will evolve as the pilot progresses and when input is received from FAA and participants. Performance metrics and data will be reviewed periodically to ensure objectives are being achieved. Collection & Storage – spreadsheet/database will be developed and maintained during the pilot project. Data in the context of this section will not be proprietary design and or technical data but more likely qualitative or quantitative measurements / attributes.

6.1 Data Identification

It is proposed to collect data or information during the execution of each pilot project. A data criterion, collection and out process tool will be created to capture the following:

- Establish objectives
- Expectation
- Approach,
- Data collection methods,
- Types of data to be collected,
- Analysis to be conducted,
- Output types,
- Customer for data,
- Recommendations.

6.2 Documentation

- a. Information related to the process and procedures defined within the D&M SMS Framework document:
 - Acknowledgement of pilot project participation;
 - Notification of pilot project acceptance and successful completion of each phase or transition between phases; and
 - Routine correspondence directly associated with a SMSPP information submission.
- b. Documents created by the FAA from information provided by the participant - records directly associated with PMT and FAA local Field Office assessment of a participant's progress associated with the pilot project.

6.3 Performance Metrics

There is also specific performance metric data generated during the execution of the pilot projects. It is anticipated that the performance metrics will be broadly grouped into categories such as:

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1. Dates – start and end dates/duration:
 - Entry of each participant into Program
 - Entry into each phase
 - Length of time to transition between phases
 - Receipt of agreed deliverables
 - etc
2. Progress or percentage complete
 - Status of participant's Implementation Plan
 - Percentage safety training and education completed
 - Percentage of participant polices & procedures hazard identification completed by certain phases.
3. Quality - number of errors or deficiencies identified:
 - Deliverables from participant
 - SMS Process changes from audits/evaluations
 - Receipt of a completed Gap tool and how many changes made after FAA review.
 - Are changes made to procedures and processes after FAA assessments
 - etc
4. Quantity
 - Number of procedure in a large company verses and small one.
 - Number of hazards between companies
 - The number of lessons learned or best practices identified during a given phase and consequences of introducing change
 - The number of new or changed policies & processes issued as a result of SMS Pilot Project participation
 - Improvement in reliability/availability

6.4 Collection and Analysis

The method and frequency of data collection will be based upon the type of analysis performed and the quantity of data required to provide a meaningful metric or indicator.

The collected performance metrics and supporting data should be reviewed periodically (monthly) to ensure objectives are being achieved i.e. processes are becoming more robust and reflect how tasks are performed, enabling safety to be improved.

A spreadsheet or database will be developed to enable the final collection, analysis and storage of data and information. The PPP team created a document called the “book of questions” that will be used throughout the pilot project to gather data. Several delivery methods have been utilized for data collection. These various methods of data elicitation are intended for a broad target audience in order to capture as much feedback as possible during the Pilot Project. Every question directly reflects one or more of the five objectives of the MSMS Pilot Project. The book of questions identifies the What, Who, to Whom, and When the data is collected.

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An analysis of the data collected during the pilot project will be performed and recorded by selected members of the MSMS team. The analytical results will be used to support the pilot project objectives. Recommendations and or changes to rules and guidance will be provided. A report at the end of the project will be written.

7 Lessons Learned Process

It is intended to collect lessons learned throughout the pilot project life-cycle; the lessons learned will hopefully reveal opportunities for improvement. As part of a continuous improvement process, documenting lessons learned will help the MSMS team discover the root causes of problems that occur during the development of the D&M SMS requirements and guidance material, and the use of the SMS documentation by industry to develop their SMS Implementation Plans, and avoid those issues in later applications of the D&M SMS process.

The lesson learned process will:

- Lessons learned are desired to be collected and how the information will be captured, reviewed & dispositioned/actioned, and shared".
- Method/approach to collecting lessons learned.
- Collection parameters for MSMS Assessment process lessons learned.
- Collection parameters for Framework Lessons Learned.
- Collection data for Pilot Project Lesson Learned
- Develop storage and tool for sharing lessons learned.
- Example lesson learned input form.

8 Project Reporting

The MSMS PPL will maintain an “SMS Pilot Project Tracking Matrix” in Microsoft™ Excel. The matrix will track various aspects of the pilot project progress and will track data collection from the pilot study. Each PMT Lead will update the status log by the first Tuesday of each month with the progress of their pilot project(s).

The status log will be accessible from the FAA AIR D&M SMS SharePoint site.

The status log will be named in the following format:

“D&M SMS Status Log_*participant company name_reporting period_date*”

Information collected in the status log will include but not limited to the following:

- Company Name (participant), location, and contact information;
- Company point of contact and contact information;
- FAA PMT Lead and member names, office, and contact information;
- Key milestone dates:
 - Orientation briefing, launch/kick and Preliminary Gap Analysis meetings;
 - Detailed Gap Analysis meeting (start-finish);
 - On-site assessment dates;

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- Transition between SMS levels (0-1, 1-2 etc.).
- Key points/summary of progress against Participant Implementation Plan
- Lessons Learned for this reporting period

Progress of the pilot project will be tracked and periodically reported to management. The frequency of the pilot report may vary (monthly or quarterly) depending on need. Pilot project report format and content are still to be fully determined.

PMTLs will be notified by the PPL when actions are coming due.

The PPL and PITLs will have a monthly telecon to discuss issues and progress of their activities.

A master meeting action log will also be maintained in the status log.

9 Final Report for the MSMS Pilot Study

A final report of the outcome from the MSMS Pilot Project will be written at the end of the pilot project study. The report will include the following:

- Purpose
- Objectives
- Lessons learned
- Analysis of project data
- Recommendations for MSMS framework
- Recommendations for assessment and oversight process
- Recommendations for applicability and scalability
- Outcomes – the achievement of pilot project goals and objectives
- Conclusion / Summary

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Appendix A - PMT Lead (PMTL) Pre-Pilot Project Orientation Meeting Checklist Rev c

	Tasks	# of Days Prior to Orientation Meeting	Completed
1.	Confirm who the POC is at the participant – Call to confirm with participant.	60 days	
2.	Confirm with the PPL about the who from the local office(s) will become PMT members (inspectors and engineers)	60 days	
3.	Prepare letter to send to the participant. (See example in Appendix B) PMTL to send all documentation in paragraph 4.2.2 to the participant.	60 days	
4.	PMTL to send all documentation in paragraph 4.2.2. to the participant and the PMT members. (local Field Office) The latest revisions are located on sharepoint.	60 days	
5.	Coordinate with PPL to see if local AFS Rep can attend Orientation Briefing. (Only required if the participant has an FAA approved repair station)	60 days	
6.	PMTL develop questions about participant work history and ask the local FAA Office(s) to answer. (Suggest Emailing to PI or ASE assigned to company.)	45 days	
7.	Send an invitation by Email to the local FAA office(s) managers (MIDO, ACO, CMO, etc) to attend the participant Orientation Briefing. Also invite the Directorate and MIO mangers.	45 days	
8.	<p>Conduct Pre-Orientation call with local FAA offices personnel that will become PMT members:</p> <ul style="list-style-type: none"> • Briefly discuss the basic purpose of Pilot Project and their roles as PMT members. • Discuss the need to adjust the Orientation Material slides based on the participant's knowledge and experience of SMS. Note: slides can be hidden from view for each presentation. • Talk briefly about the guidance material. • Let the team know that details of the SMS processes will be provided during the orientation sessions. • Ask the PMT members what they know about the participant that will be helpful for pilot project (questions raised in #6). • Confirm meeting logistics; location, date and time. • Confirm that the local office PMT members will participate on the pre-orientation telecon with the participant. 	30 days	

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	<ul style="list-style-type: none"> • Talk about the new PMT training package and their responsibility to read the information and take the Elms training. • Travel budget – confirm it's available! 		
9.	<p>Conduct Pre-Orientation call with participant POC. Local FAA offices should also attend at their discretion. <u>Note: Only the POC needs to attend the telecon.</u></p> <p>Discuss Meeting Logistics</p> <ul style="list-style-type: none"> • Confirm meeting location, dates and times, (3 days total). • Ask about company security & access requirements (where does FAA meet to get badges) – Ask about FAA contractor attending the meeting (i.e. IBM). Contractor will sign nondisclosure agreement. • Discuss need for a facilitator during the meeting (keep meeting on schedule, take notes, etc). • Ask the participant to review the materials sent to them by the PMTL so they are prepared for the orientation meeting. • Request participant to make copies of the FAA Orientation power point slides for attendees. • Ask the participant if they can provide blank (sticky) name tags to use during the meeting to get acquainted with names. • Request to have a room available for the PMT team briefing on morning of day 1. (This is recommended to save time travel time vs meeting at MIDO/ACO) <p>Discuss Meeting Preparation</p> <ul style="list-style-type: none"> • Ask participant to present a 30 minute Hi-level overview of their SMS capability prior to the preliminary gap analysis. • Discuss with participant POC what types of info is appropriate for Exec Sum presentation • Ask participant to identify components of their business model that helps to achieve parts of SMS. • Discuss the preliminary gap meeting and the reason we will be going through it with them. • Suggest they have one of their senior executives attend the preliminary gap meeting, but it is their choice. • Ask the participant to have their Subject Matter Experts (SME) at the preliminary gap meeting to help identify their SMS system during the preliminary gap discussions, (<i>E.g. safety representatives; senior managers from: engineering, quality, manufacturing, product support, flight ops, marketing, etc</i>). • Ask participant to be prepared to identify their system 	28 days	

Integrated Pilot Project Plan for Manufacturer's SMS

	<p>segments prior to the preliminary gap discussion.</p> <ul style="list-style-type: none"> ○ i.e. SMS pilot project scope such as 7X7 product line only; across all product lines; company divisions/organizations; other organizational segments. ● Very “briefly” discuss the materials that will be presented during the orientation meeting. ● Ask participant if they are participating in any other SMS programs in their repair station (e.g AFS, JCAB, EASA). ● Discuss the agenda for the three day orientation ● Ask them if they have any questions. 		
10.	Advise to Pilot Project Lead [PPL](Kurt Krumlauf) the status of participant pilot project.	28 days	
11.	Confirm with PMT members their travel arrangements – flights/hotels/ground transportation etc.	21 days	
12.	Reconfirm with participant that the logistics for Orientation briefing are on track. (<i>prepare for weather, budget or other delays if applicable</i>)	5 days	
13.	Confirm logistics for local FAA office Orientation Briefing. (<i>prepare for weather delays if applicable</i>)	5 days	
14.	Other information?		

Appendix B - Sample letters / email to participants



U.S. Department
of Transportation
**Federal Aviation
Administration**

April XX, 2011

Mr. Preston Henne
Gulfstream Aerospace
PO Box 2206
Savannah, GA 31402-2206

Dear Mr. Henne:

Gulfstream has been an active participant in the Safety Management Systems (SMS) Aviation Rulemaking Committee and we are pleased that your company has volunteered to participate in the FAA's SMS pilot project for Design & Manufacturing (D & M) organizations. This project presents an important opportunity for us to work together in making the next major step forward to improve aviation safety.

In order to start the process, we would like to conduct an orientation meeting with you and your leadership team at your facility **May 24th - 26th**. The primary purposes of the orientation meeting are to gain a common understanding of D & M SMS expectations and discuss how we envision the pilot project working. Although happy to revise to accommodate your normal business hours, our plan for the orientation meeting is as follows:

- **Tuesday, May 24th, 1:00pm – 4:30pm: Overview of SMS and Details on the D&M SMS Pilot Project** - We introduce our team and provide an overview of SMS and the pilot project expectations, processes and tools. Following that, you or a member of your staff is invited to give a short presentation on your existing capabilities that might meet SMS requirements.
- **Wednesday, May 25th, 8:00-4:00pm: Preliminary Gap Analysis** - We begin to assist you in conducting a preliminary SMS gap analysis using a structured tool that will be provided to you. If you've already completed a preliminary gap analysis, we would like to conduct a joint review of your outcomes to align it with our tool.
- **Thursday, May 26th, 8:00-4:00pm: Complete Preliminary Gap Analysis and Discuss Next Steps** – We complete the preliminary gap analysis, and Thursday afternoon we will conclude the meeting by reviewing next steps and soliciting your feedback about the orientation meeting.

Integrated Pilot Project Plan for Manufacturer's SMS

We expect to have Approximately 10 FAA personnel present for the orientation meeting. The team leader is [Mike Reinert](#), of the Safety Management Design and Analysis Branch, AIR-150, mike.reinert@faa.gov, 405.954.4815. Mike will provide you the names and background information of the FAA team via email correspondence and arrange for FAA access to your facility.

Management commitment is essential to having an effective Safety Management System. As such, it would be beneficial to have your senior management attend the beginning of our orientation meeting next month. We recognize that much of our pilot project activity may be delegated across several organizations of your company.

In preparation for our meeting, we will provide you a copy of the Orientation Briefing Materials, the D&M SMS Pilot Project Guide, Developmental Guidance for the D&M SMS Framework, and a Gap Analysis Tool. These materials are fairly comprehensive and detailed. We ask that [Gulfstream](#) become familiar with them and consider how you might complete the Preliminary Gap Analysis spreadsheet prior to the orientation meeting.

For an SMS to be fully effective it must be implemented organization-wide; however, for the pilot project you may want to scale down the project and should consider the company's products, processes and organizations that you would like to include in the project. The scope should be of proper size that you would expect to be able to fully implement SMS within 18 months subsequent to our orientation briefing. We will be contacting your organization over the next few weeks to discuss the possible scope of implementation as well as a more detailed agenda and logistical details prior to our visit in [May](#).

We see the orientation meeting as an important step to ensuring a mutual understanding of D&M SMS requirements. Beyond the orientation, we will work with you to complete your Detailed Gap Analysis and assist you in your implementation activities through the completion of the pilot project.

We look forward to meeting with you and your team.

Sincerely,



Mr. Dorr M. Anderson
FAA Aircraft Certification Service
Manufacturer's Safety Management Systems Team Lead
dorr.anderson@faa.gov
(425) 917-6404 Office
(425) 766-8908 Cell



U.S. Department
of Transportation
**Federal Aviation
Administration**

Transport Airplane Directorate
Aircraft Certification Service
1601 Lind Ave SW,
Renton WA, 98057

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May 16, 2011

Mr. Timothy Mahoney
Honeywell Aerospace
1944 E. Sky Harbor Circle
Phoenix, AZ 85034

Dear Mr. Mahoney:

First of all we would like to thank you and your management team for meeting with us in March in Phoenix. We regret not getting to meet with you personally; however, we did have a very productive discussion with your Senior Director, Chief Engineer, Mr. Chris Eick and Sr. Chief Engineer, Product Safety Programs, Mike Cummins. In addition, we met and worked with Joe Kenney and other executives and members of your Core SMS Team.

We would characterize our discussions as very productive as we mutually explored the basis for SMS implementation at design and manufacturing organizations. Honeywell is a leading provider of aerospace products that can be found on almost every type of aircraft and we are delighted that Honeywell is including a TSO and PMA product in the SMS Pilot Project. We recognize that your company is a leader in the aviation industry and that you have a number of foundational SMS elements in place. We view implementation of SMS within your company as one of incremental adjustment rather than a major change initiative. That is evident from the Preliminary Gap Analysis results. As you review this information you will see that Honeywell has incorporated certain SMS elements across many portions of your value stream.

Over the next 6 months we plan to work closely with your team to: 1) conduct a more detailed gap analysis; 2) prepare an implementation plan; and 3) to draft an SMS safety policy (already in-work within your company). We recognize that both of our organizations will be learning together and we look to work collaboratively with you. We are pleased with the SMS team that you have put in place and believe this exhibits an important commitment to proceed through with a full SMS implementation over the next 18 months.

Sincerely,

Dorr M. Anderson
FAA Aircraft Certification Service
Manufacturer's Safety Management Systems Team Lead
dorr.anderson@faa.gov
(425) 917-6404 Office

Integrated Pilot Project Plan for Manufacturer's SMS

Appendix C - MSMS Team Members and their Role

Specific Roles	MSMS Team	Organization
MSMS Team Lead	Dorr Anderson Replaced by Jeff on 12-1-11 Jeff Duven, current	FAA
MSMS Leadership Team	Dorr Anderson, Replaced by Jeff on 12-1-11 Jeff Duven, current Linda Navarro, current Kurt Krumlauf, current Bob Cook, current Mary Ellen Schutt, current Mike Reinert, current	FAA
MSMS Pilot Project Lead (PPL)	Kurt Krumlauf, current	FAA
MSMS Participant Team Members (PMT)	Kurt Krumlauf, current Bob Cook, current Mary Ellen Schutt, current Mike Reinert, current Steve Slagle, current Ralph Meyer, current Amy Powell, current Bob Anoll, former Barbara Caufield, current Rick Piper, former Michael Alberts, current replaced Rick Dan Kerman, current Eddie Falkushan, former Carmen Alvarez, current replaced Eddie	FAA
Communications Focal	Amy Powell, current Ralph Meyer, current backup	FAA
SharePoint / Website Focal	Kurt Krumlauf, current Steve Bogucki current	FAA
Data Collection & Analysis Focal	Steve Slagle, current Kurt Krumlauf, current backup	FAA
Facilitators	James Stroiney, current	IBM
	Haynes Cooney, current	IBM
	Jonathan Archer, current	Booz Allen Hamilton
Subject Matter Experts	Ruth Hunter, former	Volpe
	Mary Beth Hines, current	Volpe
	Tom McSweeney, former	Booz Allen Hamilton
	Jonathan Archer, current	Booz Allen Hamilton

Integrated Pilot Project Plan for Manufacturer's SMS

	Ken Hollinger, current Alan Stolzer, current	MITRE Embry-Riddle Aeronautical University
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