# FORENSIC DOCUMENT MANAGEMENT

Reduce Liability Exposures and Strengthen Your Compliance Posture

by

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On every business aircraft in service today, there exists a set of documents that must be on board to guarantee airworthiness, comply with those limitations found in the Aircraft Flight Manual (AFM), and meet all the regulatory requirements for operations throughout the world. Nearly all AFM or Supplemental Type Certificate Limitations contain language that requires that Pilot Operating Handbook (POH), for the XYZ component, Revision 1234-56-XXX, *"be immediately accessible to the pilot in flight."*
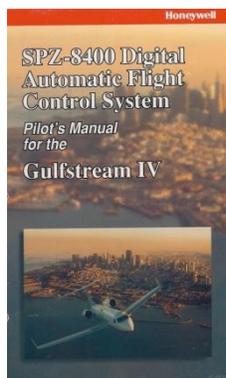
A typically-equipped Gulfstream GIV-SP, as an example, has no less than 17 such handbooks that are required. The –XXX, found in the AFM Limitations, requires that those handbooks be updated to the *latest published* Revision.

We would never think of climbing into an aircraft without a current Registration or an Airworthiness Certificate. But what about the whole host of other documents that can compromise your legal compliance and expose you to the possibility of regulatory infractions, penalties, fines, or the situation where your underwriter finds themselves in a position of questioning why you ….

GIV POH Example

"*Operated an aircraft not in compliance with all appropriate regulations and policies and in less than an airworthy condition*?"   It has been my experience that, somewhere on board the airplane, usually in the cabinet directly behind the cockpit buried on the lower shelves, lurks a collection of shrink-wrapped pilot handbooks, a document binder, a logbook, maybe even a protector with an FCC Radio Station License, and hopefully a Journey Log. In nearly all cases, when those manuals and documents are subjected to careful forensic scrutiny, errors of omission are discovered, essential documents are missing, while the operator is blissfully ignorant that they are seriously exposed to regulatory or liability risks out of negligence.

So how bad can it really be? In one case, an operator of four early serial number business jets, all purchased from the OEM used aircraft sales unit, was flying around unaware that the earliest of those jets was on the US Registry with the original EXPERIMENTAL engines, used to Type Certify (TC) the avionics suite. In another example, the aircraft lease had never been registered and recorded with the FAA and still had the registration number of the aircraft's previous original owner at the top of the document, exposing that operator to a clear breach of FAR 91.23 (c) (1) (2) & (3) and the resultant potential cumulative fines for each movement that occurred under the violation. How big is the problem and what can be done?

Just as a Crime Scene Investigator (CSI) preserves the scene, carefully tags the evidence, and then subjects each clue to forensic examination, operators have a similar obligation to conduct a forensic approach to their aircraft manuals and documentation to lessen any unnecessary liability exposures, comply with a host of global regulatory requirements, and ensure that all revisions are present to ensure basic airworthiness. A good practice would be to develop a checklist, based on your State of registration and your State of operation, and then to comb through the process to uncover those *'clues'* that need further

Flight Assurance Operational Documentation Example

analysis and attention. A good source of reference information, to begin your internal process of developing a comprehensive checklist would be the existing EASA Safety of Foreign Aircraft (SAFA) checklist, the Ramp Inspection checklist (taken from the FAA Flight Standards Information Management System (FSIMS) 8900.1); a careful examination of your State civil aviation regulations, NBAA guidance or ICAO Annex 6, Section II, etc., or seek out the services of knowledgeable industry expert that can guide you and assist you by jump-starting your deep forensic process; guaranteeing that your documentation meets the most stringent of operational requirements.

An elegant way, for today's modern cockpit environment, that the operator may want to handle document management is through the use of electronic document management software, hosted on PC and tablet devices. Documents can be uploaded and managed in such a way that leaves a clear verifiable audit trail that those latest revisions were delivered and organized in a manner that puts information where it belongs - immediately available to the crew and not buried in the bowels of the coat closet behind the Captain's seat. On-Board Data Systems is the industry leader, with its Aviation Docs™ software that delivers revised documents anywhere one the planet where an internet connection exists. Their solution provides a robust audit trail along with data encryption, which will keep your regulator happy and deliver the information you need, at a very reasonable price.

All aircraft are a continuum of compromises, balancing cabin volumes and weight reduction against the owner's use of internal space or increased operational payloads. Cleaning out the closet is a good beginning and being in a posture of hyper-regulatory compliance is just common sense that yields substantial savings while mitigating your exposure to costly unnecessary risks. A modest investment in demonstrating your conformity to *'industry best practices'* pays for itself, by an order of magnitude, while yielding substantial recognizable benefits to your Business Aviation operation.