

industry



SAFETY ALERTS

for operators and information for operators

WHEN THEY MATTER TO MAINTENANCE ORGANIZATIONS

STORY BY LINDSEY MCFARREN

Safety alerts for operators (SAFOs) and information for operators (InFOs) were introduced by the Federal Aviation Administration in the mid-2000s.

SAFOs were announced in FAA Order 8000.87A in 2005, while InFOs were announced in FAA Order 8000.91 in 2006. Both are meant to provide aircraft operators, owners, repair stations, and others in the aviation industry with information the agency feels is important but does not rise to the level of rulemaking or other more formal forms of communication. SAFOs were also meant to replace air carrier operations bulletins, which phased out in mid-90s, and allow information from air carrier operations bulletins to be reintroduced.

It's important to note that while both methods of communication have "operators" in the title, it's a bit of a misnomer. Other organizations including repair stations,

training providers, and even manufacturers are intended audiences, specifically noted in the "audience" section of some SAFOs and InFOs.

SAFOs and InFOs are assigned a number with the last two digits of the year published first, then the consecutive number of the document within that year. For example, the third SAFO of 2020 will be identified as 20003.

What is the impetus for a SAFO or InFO?

SAFOs and InFOs are published for a number of reasons. They may be generated as part of a response to a National Transportation Safety Board recommendation. Some are developed in conjunction with FAA/industry working groups to report on these efforts or promote safety recommendations.

Some SAFOs call out recent enforcement action against specific certificate holders to ensure affected parties receive

important information. For example, many SAFOs advise aircraft operators and owners of improper maintenance work or parts control. Three SAFOs issued in 2019 warn aircraft owners, operators, air agencies, and maintenance technicians of possible improper maintenance performed by three separate repair stations. These parties were instructed to inspect their aircraft, records, and parts inventories for any articles approved for return to service by two of the repair stations and to inspect the propellers serviced by the third repair station.

Are SAFOs or InFOs enforceable?

Are certificate holders or others named in the FAA's audience required to comply with SAFOs and InFOs? Actions recommended in the SAFOs and InFOs may or may not be regulatory in nature or enforceable, depending on whether they advise the audience of an existing regulatory requirement, in which case the action may be enforced, or provide information outside of existing regulation, in which case the action may be considered voluntary or administrative in nature.

Some of these communications tools advise of statutory requirements or upcoming regulations, while others are purely informative or voluntary in nature – particularly InFOs.

InFO 19002, "Human Trafficking Recognition and Response Training for Flight Attendants, Ticket Counter Agents, Gate Agents, and Certain Customer Service Personnel," advises certain air carriers of a statutory requirement to provide training regarding identifying and reporting potential human trafficking victims. InFO 19003, "Revisions to Application Requirements for Operations in Reduced Vertical Separation Minimum Airspace," in contrast, is an example of a purely administrative InFO.

However, the introduction in the SAFO template states:

"A SAFO contains important safety information and may include recommended action. SAFO content should be especially valuable to air carriers in meeting their statutory duty to provide service with the highest possible degree of safety in the public interest. Besides the specific action recommended in a SAFO, an alternative action may be as

effective in addressing the safety issue named in the SAFO."

InFOs explicitly excuse inspectors from responsibility but place responsibility for compliance on aircraft operators, stating, "Significantly, InFOs do not burden FAA inspectors with responsibilities additional to those in their work programs and are not processed in accordance with the agreement between the FAA and its inspectors' bargaining unit. The responsibility to implement any action recommended in an InFO rests with the operator."

Consider the SAFOs mentioned above that alert parties to possible improper maintenance activities. While complying with a SAFO to the letter may not be a regulatory requirement, ensuring your aircraft is airworthy and ensuring maintenance was properly conducted is a regulatory requirement.

Air carriers should be particularly diligent about reading SAFOs and completing recommended actions, as appropriate to their organization, considering the warning in the fine print about "meeting statutory duty" and providing "service with the highest possible degree of safety."

Further, in the event of legal action against your organization or you as an individual, information from SAFOs or InFOs could be used to bolster the other party's case.

While many SAFOs and InFOs share voluntary or administrative

information, it's wise to appoint someone in your organization to receive new SAFOs and InFOs as they're published, review the information to determine relevance to your organization, and take action as appropriate. The FAA requires certain certificate holders to appoint an individual to receive SAFOs and InFOs through operations specification or management specification A007, but other parties can subscribe to receive updates via the SAFO and InFO webpages.

SAFOs can be found at https://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/safo/all_safo/.

InFOs can be found at the following website:

https://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info/. □

SAFOS AND INFOS ARE PUBLISHED FOR A NUMBER OF REASONS. THEY MAY BE GENERATED AS PART OF A RESPONSE TO A NATIONAL TRANSPORTATION SAFETY BOARD RECOMMENDATION. SOME ARE DEVELOPED IN CONJUNCTION WITH FAA/INDUSTRY WORKING GROUPS TO REPORT ON THESE EFFORTS OR PROMOTE SAFETY RECOMMENDATIONS.