



Guidance Material for the Documentation Management System

CAAT-GM-OPS-DMS

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Approved by



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0 Administration

0.1 Introduction

Guidance Material (GM) is intended to assist the operators in administrative matters. The administrative requirements and processes will facilitate liaising with the Civil Aviation Authority of Thailand (CAAT). It is to be considered a tool for operators to ease processes of obtaining required and defined approvals and authorisations issued by the Civil Aviation Authority of Thailand (CAAT). Using the GM will be conducive to establishing compliance with CAAT requirements and will lead through the respective certification or variation process regarding administrative tasks.

0.2 Foreword

- 0.2.1 TCAR OPS Part ORO.GEN and ORO.MLR requires the operator to establish an Operations Manual and provides the format and minimum contents of the Operations Manuals Part A–D. It should be noted that this encompasses the documentation of the Management System.
- 0.2.2 This Guidance Material aims to cover aspects of Documentation Management System requirements. It shall assist the operator in implementing the Documentation Management complying with the requirements and integrated with the Flight Safety Documents System (FSDS) by operators conducting operations under Part CAT to ensure compliance with the appendix of ICAO Annex 6 Part 1, and Part 3.
- 0.2.3 An operator shall establish a flight safety documents system for the use and guidance of operational personnel as part of its safety management system).
- 0.2.4 A flight safety documents system is a set of interrelated documentation established by the operator, compiling, and organising information necessary for flight and ground operations, and comprising, as a minimum, the operations manual and the operator’s maintenance control manual.

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0.3 Table of Contents

0	Administration.....	0-1
0.1	Introduction	0-1
0.2	Foreword.....	0-1
0.3	Table of Contents.....	0-3
0.4	List of Effective Pages.....	0-4
0.5	Record of Revision	0-5
0.6	Revision of Highlight	0-6
0.7	Distribution List.....	0-7
0.8	Control of Manual.....	0-8
0.9	Abbreviations	0-9
0.10	Definitions.....	0-12
0.11	Purpose	0-13
0.12	Applicability.....	0-13
0.13	Scope.....	0-13
0.14	CAAT’s Obligations	0-13
1	The Management System and its Documentation.....	1-1
1.1	Processes and Procedures	1-1
1.2	Language	1-2
2	Documentation and Flight Safety Documents System (FSDS)	2-1
2.2	General.....	2-1
2.3	Structure of the Management System Documentation	2-1
2.4	Organisation.....	2-2
2.5	Design.....	2-2
2.6	Format of Manuals and Documents	2-4
2.7	Contents and elements of manuals and documents.....	2-5
2.8	Validation	2-5
2.9	Control of Amendment	2-5
2.10	Amendment	2-6
2.11	Document Control of external / Documents	2-12
2.12	Changes / Elements requiring prior Approval.....	2-13
2.13	Changes / Elements NOT requiring prior Approval.....	2-14
2.14	Deployment.....	2-14
2.15	Communication Change Information.....	2-15
2.16	Compliance of Quality System	2-15
2.17	Electronic Data Processing (EDP)	2-16

0.4 List of Effective Pages

Page	Issue	Revision	Effective Date
0. Administration			
0-1	01	00	05 Jan 2024
0-2	01	00	05 Jan 2024
0-3	01	00	05 Jan 2024
0-4	01	00	05 Jan 2024
0-5	01	00	05 Jan 2024
0-6	01	00	05 Jan 2024
0-7	01	00	05 Jan 2024
0-8	01	00	05 Jan 2024
0-9	01	00	05 Jan 2024
0-10	01	00	05 Jan 2024
0-11	01	00	05 Jan 2024
0-12	01	00	05 Jan 2024
0-13	01	00	05 Jan 2024
0-14	01	00	05 Jan 2024
1. The Management System and Its Documentation			
1-1	01	00	05 Jan 2024
1-2	01	00	05 Jan 2024
2. Documentation and Flight Safety Document System (FSDS)			
2-1	01	00	05 Jan 2024
2-1	01	00	05 Jan 2024
2-2	01	00	05 Jan 2024
2-3	01	00	05 Jan 2024
2-4	01	00	05 Jan 2024
2-5	01	00	05 Jan 2024

Page	Issue	Revision	Effective Date
2-6	01	00	05 Jan 2024
2-7	01	00	05 Jan 2024
2-8	01	00	05 Jan 2024
2-9	01	00	05 Jan 2024
2-10	01	00	05 Jan 2024
2-11	01	00	05 Jan 2024
2-12	01	00	05 Jan 2024
2-13	01	00	05 Jan 2024
2-14	01	00	05 Jan 2024
2-15	01	00	05 Jan 2024
2-16	01	00	05 Jan 2024
2-17	01	00	05 Jan 2024

0.5 Record of Revision

This version of the Guidance Material of Documentation Management System is issue no. 01, revision no. 00. The valid pages are listed in the List of Effective Pages distributed with every revision.

Issue	Revision	Effective Date	Revised by

0.6 Revision of Highlight

Area of Changed	Amendment Summary
New Issue	Entire Manual

0.7 Distribution List

Type of Document	Distributed to
Electronic Document	Air Operator by CAAT Website

0.8 Control of Manual

The Guidance Material for the Documentation Management System is established to facilitate the understanding and implementation of CAAT requirements. Utilising this guidance will contribute to establishing compliance and guide the certification or variation process for administrative tasks.

0.8.1 Amendment and Revision

Whenever there is a significant change, a new procedure issuance is required. Minor amendments shall be issued in the form of revisions, with effective pages being reviewed no later than the effective date. A vertical black line is required on the left-hand side of the page to identify the change to this revision.

Significant changes are extensive revisions necessitating a complete re-issuance when involving significant changes in organisation, responsibility, guidelines, policy, or procedures, including substantial format changes.

Minor changes are affected some contents in the provision, a revision can be made to the corresponding page.

The manual custodian shall record the details of the revision and indicate their name with their initial last name in the Records of Revision.

0.8.2 Users feedback

If you have any recommendations for improvement regarding this guidance material, please provide your valuable feedback to the Operations Management Inspection Division (OM) by sending an email to ops_om@caat.or.th

0.9 Abbreviations

Abbreviations	Meaning
A	
<i>ABB</i>	Abbreviation
<i>AM</i>	Accountable Manager
<i>ADMIN</i>	Administration
<i>AIP</i>	Aeronautical Information Publications
<i>ALARP</i>	As low as reasonably practicable
<i>AltMoC</i>	Alternative Means of Compliance
<i>AMC</i>	Acceptable Means of Compliance
<i>AOC</i>	Air Operator Certificate
<i>APP</i>	Approval – Element Requiring Prior Approval
<i>Art.</i>	Article
C	
<i>CAAT</i>	The Civil Aviation Authority of Thailand
<i>CC</i>	Cabin Crew
<i>CEO</i>	Chief Executive Officer
<i>Ch.</i>	Chapter
<i>CISM</i>	Critical Incident Stress Management
<i>CMC</i>	Crisis Management Centre
<i>CMM</i>	Compliance Monitoring Manager
<i>CMS</i>	Compliance Monitoring System
<i>CP</i>	Cover Page
D	
<i>DEF</i>	Definition
<i>DG</i>	Dangerous Goods
<i>DMS</i>	Documentation Management System
<i>DOC</i>	Document
E	
<i>ERP</i>	Emergency Response Planning
F	
<i>FSDS</i>	Flight Safety Documents System
<i>FTL</i>	Flight and Duty Time Limitation

Abbreviations	Meaning
G	
GEN	General
GM	Guidance Material
H	
HF	Human Factors
I	
ICAO	International Civil Aviation Organisation
ISS	Issue
L	
LOC	List of Effective Chapters
LEP	List of Effective Pages
LOR	List of Revisions
M	
MEL	Minimum Equipment List
MLR	Manuals, Logs and Records
MMEL	Master Minimum Equipment List
MOC	Management of Change
MS	Management System
N	
NCC	Non-Commercial Air Operations with Complex Motor-Powered Aircraft
No.	Number
NP	Nominated Person
NPA	Notice of Proposed Amendment
NPAW	Nominated Person Airworthiness Management
NPCT	Nominated Person Crew Training
NPFO	Nominated Person Flight Operations
NPGO	Nominated Person Ground Operations
O	
OM	Operations Manual
OM-A	Operations Manual Part A, General / Basic
OM-B	Operations Manual Part B, Aircraft Operating Matters
OM-C	Operations Manual Part C, Route, Role, Area and Aerodrome Operating Site Instructions and Information

Abbreviations	Meaning
<i>OM-D</i>	Training
<i>OMM</i>	Organisations/operators Management Manual
<i>ORO</i>	Organisation Requirements Air Operations
P	
<i>Para.</i>	Paragraph
<i>PRA</i>	Proposed Revision / Amendment Form
<i>RA</i>	Risk Assessment
<i>Ref.</i>	Reference
<i>REV.</i>	Revision
<i>ROR</i>	Record of Revisions
S	
<i>SE</i>	Safety Experts
<i>SEC</i>	Security
<i>SMM</i>	Safety Manager
<i>SMS</i>	Safety Management System
<i>SOP</i>	Standard Operating Procedures
<i>SPO</i>	Specialised Operations
T	
<i>TC</i>	Third Country
<i>TM</i>	Training Manual
<i>TR</i>	Temporary Revision
<i>TOC</i>	Table of Content

0.10 Definitions

Term	Meaning
<i>Air Operator</i>	This term addresses AOC holders, NCC- and SPO Operators.
<i>AOC holder</i>	Air Operator Certificate holder.
<i>could</i>	This term expresses a possibility.
<i>ideally</i>	This term expresses a best possible means of compliance and/or best experienced industry practice.
<i>may</i>	This term expresses a positive permission.
<i>may not, must not</i>	These terms express a prohibition.
<i>NCC or SPO; or NCC / SPO</i>	This term is meant to address both Non-Commercial operator of complex motor-powered aircraft and Specialised operations Operators.
<i>need not</i>	This term expresses a negative permission.
<i>shall not, will not</i>	These terms express an obligation, a negative command.
<i>shall, must, will</i>	These terms express an obligation, a positive command.
<i>should</i>	This term expresses an obligation when an acceptable means of compliance should be applied.
<i>SPO Authorisation holder</i>	SPO Operator who holds an (or several) authorisation(s) for high-risk commercial specialized operations. Such operators are sometimes referred to as authorized operator in the regulation.

0.11 Purpose

The purpose of this GM is to provide:

- 0.11.1 An overview of the general requirements of the Documentation Management System.
- 0.11.2 guidance on the possibility of developing an operators Documentation Management System.
- 0.11.3 guidance on the possibility of developing an operators Flight Safety Documents System.
- 0.11.4 a self-assessment tool for operators to verify compliance with the relevant legal requirements; and
- 0.11.5 a certification tool for CAAT to conduct document evaluation regarding compliance with the relevant legal requirements.

0.12 Applicability

- 0.12.1 In this publication, the word 'should' be used to indicate that the Operator has a degree of latitude in adhering to the requirement, particularly where the nature of the operation or proposed operation affects their ability to achieve the necessary degree of compliance, provided that an acceptable level of safety is achieved.
- 0.12.2 If the operator response is deemed to be inadequate by the Director General, a specific requirement or restriction may be applied as a condition of the appropriate instrument to be issued under Thailand Civil Aviation Regulations. This publication includes associated means of compliance and interpretative material wherever possible, and unless specifically stated otherwise, clarification will be based on this material or other relevant CAAT documentation.

0.13 Scope

- 0.13.1 The material on hand covers aspects of documentation management system requirements and should assist the operators in implementing The Documentation Management and complying with the requirements.
- 0.13.2 Definitions, when necessary, are outlined and explained within reference [paragraph 0.10](#).
- 0.13.3 A separate list of definitions is not provided.

0.14 CAAT's Obligations

- 0.14.1 When considering whether a manual is acceptable/approval, CAAT has 2 primary obligations:
 - a) The manual contains the information that is required by regulations or that is required to be included in the manual.
 - b) The manual should present information in a manner that the processes and procedures can be understood and complied with by the operator's key personnel, crew members, and other operational safety-critical personnel.
- 0.14.2 If CAAT is not satisfied regarding these 2 matters:
 - a) When the manual is being reviewed as part of the assessment of an application for a certificate and variation, CAAT may refuse to grant the certificate unless the manual is modified.
 - b) When the manual is being reviewed as part of a surveillance event, CAAT may issue directions to the operator to amend their manual.

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1 The Management System and its Documentation

1.1 Processes and Procedures

The content of the operators' documentation – independent of the activity of an organisation – consists of philosophies, principles, policies, processes, procedures, tasks, and subtasks.

TCAR OPS: Parts-ORO require, amongst others, that the lines of responsibility and accountability throughout the organisation and the key processes of the operators are defined and documented.

To be complete and meaningful, the processes and procedures defined in the manuals should as a minimum, provide information to answer the following questions:

- a) What should be done?
- b) Who does it?
- c) How, when, and where must it be done?
- d) Which tools / forms should be used?

1.2 Language

The operator should ensure that all personnel are able to understand the language in which those parts of the operators' documentation, which pertain to their duties and responsibilities – are written. The content of the documentation shall be presented in a form that can be used without difficulty and observes human factor principles. A respective requirement can be found for TCAR OPS: Parts-ORO.MLR.100(k) Operations Manual – general.

Consequently, the operator should not only designate a primary language to establish documentation but also consider common language for collaboration with other persons and operators (e.g., contractors). This can lead to the use of different languages in different parts of the operators' documentation (Management System).

2 Documentation and Flight Safety Documents System (FSDS)

2.1.1 Reference

- a) ORO.GEN.125
- b) ORO.GEN.130
- c) ORO.GEN.200
- d) ORO.GEN.220
- e) ORO.AOC.115
- f) ORO.MLR.100

2.2 General

- 2.2.1 A flight safety documents system is a set of inter-related documentation established by the operator, compiling, and organizing information for flight and ground operations and including, as a minimum the operations manual and the maintenance control manual for an air operator. However, it is not specific only to an air operator, but may be used by any organization that uses inter-related documents in its operation. It is important for operational documents to be consistent with each other, and consistent with regulations, manufacturer requirements and human factors principles.
- 2.2.2 It is also necessary to ensure consistency across departments as well as consistency in application. Hence the emphasis on an integrated approach, based on the notion of the operational documents as a complete system.
- 2.2.3 The development of a flight safety documents system is a complete process, and changes to each document comprising the system may affect the entire system.
- 2.2.4 The guidelines in this chapter address the major aspects of an operator's flight safety documents system development process, with the aim of ensuring compliance with ICAO Standards.
- 2.2.5 As stated in the Annex of Regulation of The Civil Aviation Authority of Thailand No.26, the operators shall implement and maintain a Management System to ensure compliance with the essential requirements, to provide safe services, and to aim for continuous improvement of this system.
- 2.2.6 The operators shall implementation and maintenance of the Management System means that:
- a) Philosophies, policies, procedures, and tasks including responsibilities, accountabilities and course of action should be documented in an appropriate set of manuals and implemented.
 - b) Employees should be educated based on Management System Documentation.

2.3 Structure of the Management System Documentation

- 2.3.1 The operators should illustrate the hierarchy and interrelationships of the manuals, developing the operator's Management System.
- 2.3.2 The operators' Management System Documentation may be included in a separate manual or in (one of) the manual(s) as required by the applicable Subpart(s).
- 2.3.3 It is not required to duplicate information in several manuals. The information may be contained in any of the operator manuals, which may also be combined, and

- 2.3.4 The operator's organisation may also document some required information in separate documents (e.g., procedures). It is necessary to ensure that manuals contain adequate references to any separate records. These documents are considered an integral element of the Management System Documentation of the operator's organisation.

2.4 Organisation

2.4.1 Ease of Access Information

A flight safety documents system should be organised according to criteria which ensure easy access to information required for flight and ground operations contained in the various operational documents comprising the system. The system should also be organized to facilitate effective management of the distribution and revision of operational documents.

2.4.2 Group of Information

Information contained in a flight safety documents system should be grouped according to the importance and frequency of use of the information, as follows:

- a) Time critical information, e.g., information that can jeopardise the safety of the operation if not immediately available.

Note: Time critical information should be placed early and prominently in the flight safety document system and should be placed in cards and/or quick-reference guides.

- b) Time sensitive information, e.g., information that can affect the level of safety or delay the operation if not available in a short period.

Note: Time sensitive information should be placed on cards and/or quick-reference guides.

- c) Frequently used information.

Note: Frequently used information should be placed in cards and/or quick-reference guides.

- d) Reference information, e.g., information that is required for the operation but does not fall under Time sensitive information or frequently used information; and

- e) Information that can be grouped based on the phase of operation in which it is used.

- 2.4.3 The operator should define the total amount of time allocated to each category of information to ensure that the operational person receives any information that may affect their duties and/or tasks within a reasonable timeframe. This should include the process timeframe after receiving the information, validation, amendment, and deployment of the relevant document to the related personnel.

2.5 Design

2.5.1 Terminology and Meaning

- a) A flight safety documents system should maintain consistency in terminology and in the use of standard terms for common items and actions.

- b) Operational documents shall include a glossary of terms, acronyms, and their standard definition, updated on a regular basis to ensure access to the most recent terminology. All significant terms, acronyms and abbreviations included in the flight documents system shall be defined.

2.5.2 Format and Style

A flight safety documents system shall ensure standardisation across document types, including:

- a) writing style, terminology.
- b) use of graphics and symbols; and
- c) formatting across documents.

Note: This standardization includes a consistent location of specific types of information, consistent use of units of measurement and consistent use of codes.

2.5.3 Front End

Where appropriate, each document should contain a consistent presentation in the front that including:

- a) A record of revisions.
- b) Listing of effective pages.
- c) Table of contents, contain the titles of no more than 2 levels of headers.
- d) Index of not more than 3 levels indexing to the important words and phrases within the manual.
- e) An explanation of manual purpose, construction, availability, revisions, and distributions.

Note: The table of contents index should have separate tables to enable the user to have immediate access to the portions of the document.

2.5.4 Master Index

- a) A flight safety documents system should include a master index to locate, in a timely manner, information included in more than one operational document.
- b) The master index should be placed in the front of each document, and it should consist of no more than 3 levels of indexing.

Note: Pages containing abnormal and emergency information should be tabbed for direct access.

2.6 Format of Manuals and Documents

- 2.6.1 In selecting the format of the Operations Manual, the primary criteria are that the manual should be easily useable and understood. The volume size should make the manual easy to handle in the aircraft, at least for those volumes that are required to be carried on the aircraft.
- 2.6.2 The quality of paper and printing reproduction of text and diagrams should be readable under all operating conditions. The manuals should also be in a format which is easily amendable. Electronic versions of the Operations Manual are acceptable, provided they meet all the requirements of TCAR OPS.
- 2.6.3 In selecting the make up the Operations Manual, if possible, should be to make each part complete. For example, different aircraft types should be in separate sub- sections or chapters.
- 2.6.4 The Operations Manual should have its own contents page. There should be a table of contents at the beginning of each manual and for each section or chapter. Appendices and additional headings and procedures should be included as required in suitable locations within the manual, considering the need for usability and readability. Very large manuals should include an index.
- 2.6.5 The operator should ensure the quality of the operator’s documentation. In particular, the internal processes associated with validating, amending, distributing, and controlling this documentation are essential in determining the operator’s ability to ensure consistent adherence by its employees and to demonstrate effective compliance with CAAT.
- 2.6.6 Explanations and definitions of terms and abbreviations for the use of the document should be directly available in the manual concerned.
- 2.6.7 The Operations Manual shall be presented in a format that can be used without difficulty:
- a) The format of the manual should be uniquely identifiable, and the page layout explained.
 - b) The manual / layout should be designed in a form that is easy to revise.
 - c) Dividers should be separated for each section or chapter.
 - d) Each section or chapter should represent an area of document development and should be divided into sub-sections or sub-chapters which are chronologically numbered.
 - e) On each page of the manual, the effective date and revision status should be indicated.
 - f) The pages should be numbered.
 - g) References should be comprehensible and correspond to the wording used in the different manuals. For example:
 - Refer to the Operations Manual Part B, Chapter 4 Performance (En-Route climb limits, etc.)

2.7 Contents and elements of manuals and documents

- 2.7.1 A description of the documents that constitute the complete manuals and documents should be included in a table of contents at the beginning of each manual and document and for each section or chapter. The use of appendices and annexes should be included as required in suitable locations within the manuals and documents, considering the need for usability and readability.
- 2.7.2 Manuals or Documents, as applicable, are required to include matters relating to governance, organisational structure, administration, personnel duties, responsibilities, and accountabilities. These organisational elements should offer a level of detail about supervision and control that is satisfactory to CAAT and sufficient for its personnel to use as a reference to support normal and abnormal operations.

2.8 Validation

- 2.8.1 A flight safety documents system shall be validated before deployment, under realistic conditions.
- 2.8.2 The validation shall involve the critical aspects of the information use, to verify its effectiveness. Interactions among all groups that can occur during operations shall also be included in the validation process.

2.9 Control of Amendment

- 2.9.1 Each manual should have a control of pages identifying page numbers, dates of issue and effective date to ensure validity of the contents. Each amendment/revision and/or additional page should be recorded on a page specially provided in manual for that purpose and signed for by the person making the amendment. All such amendments or revisions shall be issued to all personnel that are required to use this manual. To ensure adequate control, each section or chapter of the Operations Manual should be numbered individually.
- 2.9.2 The operators executive responsible for control of the contents of the Operations Manual/Document should also be responsible for the issue of volumes to operations personnel and for dispatching amendments as needed. This task may be delegated to another person or business unit that reports to the responsible manager.
- 2.9.3 Amendments to the Operations Manual/Document should be produced as new or replacement pages. Handwritten amendments to manuals are not acceptable.
- 2.9.4 Amendments to the Operations Manual/Document should be easily identifiable through use of a vertical amendment line or similar marking (for example, highlighting the text).
- 2.9.5 Amendments to the Operations Manual/Document should be accompanied by a cover letter identifying the reason for changes. This is particularly important when changes are made to any safety-related information.
- 2.9.6 A revision to the list of effective pages should be included with any amendments.

2.10 Amendment

2.10.1 External Source Revisions

The operator's information gathering, review, distribution, and revision control system to process information and data obtained from all sources relevant to the type of operation conducted, including, but not limited to the:

- a) State of the Operator.
- b) State of Design.
- c) State of Registry; and
- d) Manufacturers and Equipment Vendors.

Note 1: Aircraft manufacturers provide information for the operation of specific aircraft that emphasises the aircraft systems and procedures under conditions that may not fully match the requirements of operators. Operators shall ensure that such information meets their specific needs.

Note 2: The operator's system should be capable of responding to this information in a timely manner and in accordance with CAAT requirements.

2.10.2 Internal Changes

The operator's an information gathering, review and distribution, and revision control system should be adequate to process information resulting from changes that originate within the operator, including:

- a) Changes resulting from the installation of new equipment.
- b) Changes in response to operating experience.
- c) Changes in an operator's policies and procedures.
- d) Changes in an operator certificate; and
- e) Changes for the purpose of maintaining cross fleet standardisation.

Note: The operators should ensure that coordination philosophy, policies, and procedures are specific to their operations.

2.10.3 Amendments, revisions, and additions to the Operations Manual/Document should be approved by the document responsible/owner of the Operations Manual/Document or applicable section or chapter. In some cases, this will involve ensuring changes made by the originator of the manuals are correct and appropriate to the Operations Manual. For example:

- a) When the aircraft manufacturer changes the aircraft operating manuals that would affect the company's operations.
- b) When amendments issued by a contractor providing aircraft performance data would affect the aircraft performance, aircraft operations, and perhaps the policy and procedures in the Operations Manual.

2.10.4 It is important for operational documents to be consistent with each other and consistent with regulations, manufacturer requirements, and Human Factors principles.

- 2.10.5 The operator should develop a process or system that manages all document changes to the Operations Manual/Document and any consequential effects it may have on other volumes of the Operations Manual/Document. If the Policy and Procedures volume are changed, it may also require changes to the Aircraft Operations volume or the Aerodrome and Route Guide, therefore, the development of a flight safety documents system is a complete process, and changes to each document comprising the system may affect the entire system.
- 2.10.6 The amendment procedure shall enable the operator to determine and ensure that unforeseen changes leading to the content amendment are following the applicable requirements and should be notified at the earliest opportunity to CAAT to amend the certificate and related terms of approval if necessary. This procedure should also consider the development process as part of the flight safety document system.
- 2.10.7 The amendment procedure should consider all interactions with CAAT and effective distribution:
- a) revisions and amendments are to be processed and concluded entirely before new changes are initiated and submitted to CAAT.
 - b) submissions to CAAT shall only take place after internal compliance verification.
 - c) statement that the documentation sent to CAAT has been verified and found in compliance with the applicable requirements.
 - d) insertion of effective date after acceptance/approval.
 - e) provision of final edition to CAAT.
 - f) effective distribution of manual without delay to employees concerned.
 - g) ensuring awareness of personnel regarding the changes that are relevant to their duties.
 - h) ensuring that all personnel have easy access to the operation's manual parts relevant to their duties.
 - i) A clear reference to the applicable system of amendment and revision for each part/manual/document is necessary.
 - j) The document responsible/owner shall be clearly defined. The distribution of owners and responsibilities is ideally shown in a simple matrix (Table 1: Example Responsibility Matrix).

Document	Content	Format	Document responsible/owner				
			Nominated Person Flight Operations (NPFO)	Nominated Person Ground Operations (NPGO)	Nominated Person Crew Training (NPCT)	Compliance Monitoring Manger (CMM)	Safety Manager (SMM)
OM-A	Flight Procedures	Electronic/Paper	X				
	Operational Control Procedure	Electronic/Paper	X				
	Ground Operations Procedure	Electronic/Paper		X			
OM-B	Operating Procedures	Electronic/Paper	X				
OM-C	Route and Aerodrome	Electronic/Paper	X				
OM-D	Flight Crew Training	Electronic/Paper			X		
	Cabin Crew Training	Electronic/Paper			X		
	Dispatch Training	Electronic/Paper			X		
	Ground Handling Operation Training	Electronic/Paper		X			
	Management System Training	Electronic/Paper				X	X
OMM	Safety Management	Electronic/Paper					X
	Occurrence Reporting	Electronic/Paper					X
	Complete Organisation Documentation	Electronic/Paper				X	
	Compliance Monitoring	Electronic/Paper				X	
	Documentation Management System	Electronic/Paper				X	

Table 1: Example Responsibility Matrix

2.10.8 Types of Revisions

Depending on the situation, the revisions may be carried out as:

a) Normal Revision or Standard Revision

Regularly and permanently performed changes on specific subjects in Parts, Chapters, and/or Subchapters.

b) Temporary Revision (TR)

Time limited changes or amendments, published additionally to the revision in effect.

- i) Temporary Revisions are to be cancelled after expiration or if no longer valid, appropriate, or applicable. Temporary revisions are ideally issued in yellow. The start and end date of the temporary revision should be indicated on each page.
- ii) When amendments or revisions are required in the interest of safety, the operators may be published and implemented immediately, provided that any required approval has been applied for and CAAT is supplied with the intended revision.
- iii) If such communication means as a circular or bulletin, is equivalent and have same purpose to the use of Temporary Revisions (TR) to facilitate timely updates the operation manual procedures in accordance with TCAR OPS, the following actions should be complied with.
 - The procedure to apply the TR procedure of equivalent shall be initially approved by CAAT before implement of this procedure.
 - For those subjects which require prior approval, the issued document shall be granted approval by CAAT before implementing such revised procedure in organization.
 - For those subjects which do not require prior approval, the issued document shall be notified to CAAT before implementing such revised procedure in organization.
 - These approved or accepted documents should be inserted under a tab immediately following the list of effective pages.

2.10.9 Example Revision/Amendment Process

Step	Action	Responsibility
Monitoring and Change Identification.	<ul style="list-style-type: none"> ▪ Collection of suggestions and discrepancies Findings, corrective and preventive actions. ▪ Changes in relevant standards and Requirements. ▪ Management of Change. 	Document Owner or designated person
Identification of elements requiring prior approval or not requiring approval.	<ul style="list-style-type: none"> ▪ Identify elements requiring prior approval/acceptance. ▪ Select administrative requirements for submission accordingly. ▪ Ensure Compliance Check prior to CAAT submission. 	Document Owner or designated person
Change Initialisation	<ul style="list-style-type: none"> ▪ Identify/define the type of revision: <ul style="list-style-type: none"> - Revision or new edition? - Normal/Standard Revision? - Temporary Revision? ▪ Ensure that no actual revision/amendment is in process and/or pending by CAAT. 	Document Owner or designated person
Establish a draft of revision/amendment	<ul style="list-style-type: none"> ▪ Edit and establish change. ▪ Mark any changes to the previous version by a vertical line on the border of the page. ▪ Eliminate change indicators from the previous revision of that page. 	Document Owner or designated person
Compliance Check	<ul style="list-style-type: none"> ▪ Verify compliance, compatibility, and completeness with standards, requirements, and regulations, harmonisation with other documents, viability & appropriateness. ▪ Conduct an assessment of risks, if required. ▪ Verify the requirement for a detailed audit. ▪ Ensure traceability of changes. ▪ Check completeness. ▪ In case of changes not requiring prior approval, ensure that no element requiring prior approval is included. 	Compliance Monitor Manager or designated person and Document Owner
CAAT Submission with elements requiring prior approval	<ul style="list-style-type: none"> ▪ Prepare submission in accordance with the administrative requirement. ▪ Changes requiring prior approval/acceptance: 	Nominated Person of the Department/Division

Step	Action	Responsibility
	<ul style="list-style-type: none"> - Submit revised pages as drafts within a reasonable time before the date of the intended changes. ▪ In case of a planned change of a nominated person: <ul style="list-style-type: none"> - Inform CAAT within a reasonable time before the proposed change date. ▪ In case of unforeseen changes: <ul style="list-style-type: none"> - Inform CAAT at the earliest opportunity. 	
CAAT Submission without any element requiring prior approval	<ul style="list-style-type: none"> ▪ Prepare submission in accordance with the administrative requirements. ▪ Confirm that no elements requiring prior approval are included. ▪ Submit revised pages within a reasonable time before the date of the intended changes. ▪ In case of unforeseen changes: <ul style="list-style-type: none"> - Inform CAAT at the earliest opportunity. 	Nominated Person of the Department/Division
Document Evaluation	<ul style="list-style-type: none"> ▪ Apply corrective actions. ▪ Agree on implementation or conditions with CAAT. ▪ Implement CAAT-prescribed conditions under which the organisation may operate during the implementation. ▪ Agree effective Date with CAAT. 	CAAT
Distribution	<ul style="list-style-type: none"> ▪ If approval or acceptance by CAAT is required, initiate distribution and implementation only after receives formal approval or approval/acceptance by CAAT. ▪ Add effective date. ▪ Complete List of Highlights of Revision. ▪ Up-date list of alternative means of compliance / flexibility provisions (if applicable). ▪ Distribute new edition/revision/amendment (including CAAT) together with the Letter of Revision. ▪ Ensure withdrawal of old version documents if necessary ▪ Instruct / inform employees. 	Assigned Employee

Step	Action	Responsibility
Up-date document / manual	<ul style="list-style-type: none"> ▪ Enter revision/amendment correctly. ▪ Sign and date the change in the Record of Revision. 	Document Owner
Ensure document/manual received	<ul style="list-style-type: none"> ▪ Send the signed/acknowledge Letter of Revision to the document owner. 	Document user
Monitor	<ul style="list-style-type: none"> ▪ Collect signed/acknowledge Letter of Revision. ▪ Monitor the reception and completion of the revision of each document holder. 	Compliance Monitor Manager and Document Owner or designated person

2.11 Document Control of external / Documents

- 2.11.1 Third parties establish and amend external documents (e.g., law, international standards, manufacturers' documents, etc.). They have an impact on the operators' activities and, therefore, often also on the operator's standards.
- 2.11.2 The amendment process should ensure that new issues and revisions of external documents are identified.
- 2.11.3 The process should specify who is responsible for identifying changes in external documents and who oversees identifying the impact on the operators' activities and specific standards. Major elements of such processes are:
- a) Identify new issues and changes in external documents.
 - b) Verify the impact on the company processes.
 - c) Trigger the amendment process; and
 - d) Ensure that old versions of documents are stored to ensure traceability within a reasonable time.
- 2.11.4 Examples of external documents are Aircraft Flight Manuals, MMEL, Airworthiness Directives, Service Bulletins, commercially produced manuals, or any kind of legal documents.
- 2.11.5 If the operators decide to use material from another source for its Manual System, the organizations/operators should either copy the applicable material and include it directly in the relevant part of the Manual, or the Manual should contain a statement that the specific Manual(s) (or parts thereof) may be used instead.

2.12 Changes / Elements requiring prior Approval

2.12.1 Element requiring prior Approval.

- a) The elements of the operator management system shall require prior approval by CAAT.
- b) The scope of the certificate or the terms of approval of an operator requiring prior approval.
- c) There shall be a description of the types of activities conducted by the organisation: e.g. CAT operations, NCC Operations, commercial high-risk SPO, continuing airworthiness management organisation, maintenance organisation, approved training organisation, etc.
- d) The respective manuals should define a detailed list of activities (e.g., specific approvals, type of training provided). Consequently, a respective cross-reference to the respective manual should be established.
- e) Any changes to the accountable manager specified in ORO.GEN.210(a).
- f) For SPO Authorisation holders the changes affecting the scope of the authorisation operations shall require prior approval.
- g) Any aspect of the Management System requires prior approval by CAAT for all AOC holders. This is likewise applied to SPO Authorisation holders. Elements of the Management System are defined as Lines of Responsibilities and Accountability;
 - i) Lines of Responsibilities means a graphic representation of the structure of an organisation showing the relationships of the positions also referred to organisation chart.
 - ii) Responsibility indicates the duty assigned to a position or the condition or fact of having an obligation to deal with an aspect or having authority over a particular individual.
 - iii) Accountability is the liability created for the use of authority. Authority is the right or power assigned to an executive or a manager to achieve certain organisational objectives. Responsibility may be delegated, but accountability is not.

2.12.2 Changes requiring prior approval may only be implemented by the organisation upon receipt of formal approval by the CAAT.

2.12.3 To provide an overview of the elements requiring prior approval, the process should include a reference to the list of Acceptance and Approvals or Compliance List.

2.12.4 The process should include the step that the compliance monitoring manager checks compliance with the valid regulations and the CAAT-published alternative means of compliance, certification, and/or guidance material, as applicable.

2.12.5 The organisation should integrate the handling of changes/elements requiring prior approval into the amendment and revision process system, which describes the administrative procedures with CAAT.

2.12.6 The amendment procedure should specify that the application is submitted before any changes take place.

2.12.7 The operator shall ensure that the relevant administrative procedure in terms of forms and checklist are included within the amendment process.

2.12.8 The application for the amendment of a document/manual should be submitted to CAAT within reasonable time before the date of the intended changes.

2.12.9 The amendment procedure shall ensure that in the case of a planned change of a nominated person, the operator should inform the CAAT within reasonable time before the proposed change date.

2.13 Changes / Elements NOT requiring prior Approval

- 2.13.1 CAAT shall approve procedures concerning changes that do not require prior approval.
- 2.13.2 For operators all changes not requiring prior approval shall be managed and notified to the CAAT as defined in the procedure approved by CAAT.
- 2.13.3 The organisation should integrate the handling of changes/elements not requiring prior approval into the amendment and revision process system, which describes the administrative procedures with CAAT.
- 2.13.4 Processes related to the handling of changes not requiring prior approval should include at least the following steps:
 - a) that the compliance monitoring manager checks compliance with the valid regulations and the CAAT published alternative means of compliance, certification, and/or guidance material as applicable;
 - b) verification that no element requiring prior approval is included; and
- 2.13.5 In order to identify the elements not requiring prior approval, the procedure should include a reference to the list of Acceptance and Approvals or Compliance List. Such revisions/amendments are to be submitted to within reasonable time to the planned publication accompanied by:
 - a) The Proposed Revision / Amendment Form (PRA);
 - b) The compliance list appropriate to the concerned revision/amendment;
 - c) A statement by the Accountable Manager (AM) and the respective responsible nominated person for the planned revision/amendment that the content of the revision/amendment is in accordance with:
 - i) the operational need;
 - ii) the general compliance statement; and
 - iii) the AM's and the respective nominated person's releases of the revision/amendment.

2.14 Deployment

- 2.14.1 Operators shall monitor deployment of the flight safety documents system, to ensure appropriate and realistic use of the documents, based on the characteristics of the operational environment and in a way, which is both operationally relevant and beneficial to operational personnel.
- 2.14.2 This monitoring shall include a formal feedback system for obtaining input from operational personnel.
- 2.14.3 Records of the distribution of the Operations Manual/Document to aircraft libraries, operational offices and individual personnel should be kept.

2.15 Communication Change Information

2.15.1 Methods for Communication

- a) The operator should have standardisation methods of communicating new information to their personnel.
- b) The specific methods should be responsive to the degree of communication urgency.

Note: A frequent change diminishes the importance of new or amendment procedures, it is desirable to minimise changes to the flight safety document system.

- c) New information should be reviewed and validated considering its effects on the entire flight safety documents system.

2.15.2 Tracking of Distribution of Changes Information

- a) The method of communicating new information should be complemented by a tracking system to ensure currency by operational personnel.
- b) The tracking system should include a procedure to verify that operational personnel have the most recent updates.

2.15.3 A flight safety documents system should be reviewed:

- a) On a regular basis (at least once a year);
- b) After major events (mergers, acquisitions, rapid growth, downsizing, etc.);
- c) After technology changes (introduction of new equipment); and
- d) After changes in safety regulations.

2.16 Compliance of Quality System

A flight safety documents system should comply with the requirements of the operator's quality system, where applicable.

2.17 Electronic Data Processing (EDP)

2.17.1 Reference

- a) ORO.GEN.220
- b) ORO.MLR.100

2.17.2 If an organization decides to present the relevant documentation in an electronic system or Electronic Data Processing (EDP) used to retain records related to the management system, the accessibility, usability, and reliability, including the backup system, should be described. The concept should be documented with specific procedures and responsibilities.

- a) Accessibility:
 - i) User should have access to hardware, software and data whenever needed within a reasonable time;
 - ii) User should be supplied with controlled hardware together with the required software and data for operations.
- b) Reliability including Back-Up System:
 - i) Data mirroring (data saved onto two separate hard drives) and a periodically;
 - ii) It is recommended to include data recovery with periodic spot checks to verify the effectiveness of the back-up;
 - iii) The EDP solution should be tested, functional and well implement.
- c) Usability:
 - i) Ensure that it can be applied/executed without difficulty. Either established with standard software solutions or specific training needs to be implemented for all users. Information/files/data should be easily and quickly downloaded and/or updated, e.g., specific online tools accessible via the internet.
- d) Physical Security:
 - i) A description of the EDP security policy;
 - ii) A description of the handling and exposure of hardware/software components in general;
 - iii) Instructions in the handling of access rights;
 - iv) The provision of a Software Protection;
 - v) Information concerning Data alteration and theft;
 - vi) Explanation on preventive use of dedicated Hard Disk Drive partitions.