# ADVISORY CIRCULAR AC 09-004

# PREPARATION OF ACCEPTABLE DIRECTIVE CONFORMANCE CHECKLISTS

#### SECTION 1 GENERAL

#### 1.1 Purpose

This Advisory Circular (AC) provides guidance for acceptable completion of the directive conformance checklists that are required for certification of organizations seeking approval as an—

- Air Operator Certificate (AOC)
- Aerial Work Operator Certificate
- Approved Training Organization Certificate
- Approved Maintenance Organization Certificate

#### 1.2 STATUS OF THIS ADVISORY CIRCULAR

This is an original issuance of this AC.

#### 1.3 BACKGROUND

- A. An organization seeking approval by the GCAA will be required to demonstrate conformance with Ghana legislation and directives during the certification. A proven method of demonstrating conformance is the submission of a conformance checklist listing each Section and subparagraph and how the applicant will comply with those directives.
- B. This AC has been developed to assist these organizations to demonstrate their conformance with Ghana aviation directives by referencing, using a standardized presentation, where the regulatory requirements are found as policy and procedure in the company manual system.
- C. The GCAA will use the conformance checklists submitted by the organization seeking approval as a key reference document to review the organization's manual system to confirm that all applicable regulatory requirements are included.
- D. Organizations that conform to the legislation and directives will be in compliance with the international aviation standards.

#### 1.4 APPLICABILITY

This AC is applicable to organizations that submit an application for certification as an aviation organization under GCADs—

- 1) Part 6 as an approved maintenance organization;
- Advisory Circulars are intended to provide advice and guidance to illustrate a means, but not necessarily the only means,
  of complying with the directives, or to explain certain regulatory requirements by providing informative, interpretative and
  explanatory material.
- Where a directive contains the words "prescribed by the Authority," the AC may consider to "prescribe" a viable method of
  compliance, but status of that "prescription" is always "guidance" (never a directive).

- 2) Part 3 as an approved training organization;
- 3) Part 11 as an aerial work certificate holder;
- 4) Part 09 as an air operator conducting commercial air transport; and
- 5) Part 18 as an operator approved for transportation of dangerous goods by air.

#### 1.4.1 **DEFINITIONS & ACRONYMS**

- A. The following definitions are used in this advisory circular—
  - Conformance Checklist. A checklist to prepared by an applicant to demonstrate awareness of and compliance with the applicable directives for their proposed functions and operations in aviation.
  - 2) Repository Paragraphs. A term used to describe paragraphs that tend to have more than 10 lines and contain long unbroken discussions.
- Similar checklists used by mature aviation oversight organizations are referred to as "compliance statements," "letter of compliance," "conformance reports."
- All of these documents perform the same function during the certification process which is to verify that the applicant is in compliance with applicable directives when the certification is
- B. The following acronyms are used in this advisory circular—
  - 1) AC Advisory Circular
  - 2) AOC Air Operator Certificate
  - 3) CPC Certification Project Coordinator
  - 4) FAC Formal Application Checklist
  - 5) GCAA Ghana Civil Aviation Authority
  - 6) GCADs Ghana Civil Aviation Directives
  - 7) PASI Pre-Application Statement of Intent
  - 8) SRR Specific Regulatory Requirement

#### 1.5 RELATED DIRECTIVES

The following directives are directly applicable to this advisory circular—

- Part 6, AMO Certification and Administration
- Part 7, Instruments and Equipment
- Part 3, ATO Certification and Administration
- Part 08, Operations of Aircraft
- Part 09, AOC Certification
- Part 09, Passenger Carrying
- Part 02, AOC Personnel Qualification
- Part 09, AOC Flight, Duty and Rest Limitations
- Part 09, AOC Operational Control
- Part 09. Aircraft Mass and Balance and Performance
- Part 18, Transportation of Dangerous Goods

#### 1.6 RELATED PUBLICATIONS

For further information on this topic, organizations are advised to review the following publications and regulatory requirements—

- 1) Ghana Civil Aviation Authority
  - ♦ Ghana Civil Aviation Directives
  - ♦ AC09-001, AOC Certification
- International Civil Aviation Organization (ICAO)
  - Doc 8335. Manual on Operations Certification
- 3) Federal Aviation Administration (FAA)
  - Order 8900.1, Flight Standards Information Management System (FSIMS)

Copies may be obtained from the Safety Regulations Department.

Copies may be obtained from Document Sales Unit, ICAO, 999 University Street, Montreal, Quebec, Canada H3C 5H7.

Copies may be obtained through the Internet address of www.fsims.faa.gov.

#### Section 2 General Information

#### 2.1 PRIMARY METHOD

A. The conformance checklists are the <u>primary</u> <u>method</u> used by the GCAA to ensuring that

the applicant has-

- Considered all safety directives applicable to its operations; and
- $\wedge$
- The applicant should ensure that these documents are as accurate as possible.
- It is important to be meticulous in the development and cross-referencing of these documents with the manual system.
- Established policy and procedures for conformance of its personnel with those requirements.
- A. These checklists are the most critical documents in the certification process.

#### 2.2 APPLICANT COMPLETION OF CONFORMANCE CHECKLISTS

The applicant should complete the Conformance Checklists as its personnel are putting together its system of policies and procedures for operations and maintenance to ensure that the proper safety standards have been addressed.

 Past experience has found that most applicants will wait until they believe that they have a complete system developed and ready for submission.

The applicant should complete the conformance checklists at the beginning of the development of the manuals and formal application package.

- In the rush to complete the formal application, the applicant's personnel tend to view the completion of the Conformance Checklists as an inconvenience or a slight to their vast knowledge and experience.
- The result is that they will not usually take the time to fully consider the requirements and implications of specific directives in the rush to complete the document for submission.

#### 2.3 AVAILABLE CONFORMANCE CHECKLISTS

- A. The following Conformance Checklists are available for applicants—
  - Part 6 Conformance Checklist Required for AMO

Digital MS Word copies of these conformance checklists may be obtained from the GCAA.

- Part 09 Conformance Checklist Required for AOC
- Part 03 Conformance Checklist Required for ATO
- Part 09 Conformance Checklist Required for AOC
- Part 18 Conformance Checklist Required for carriage of Dangerous Goods
- B. Electronic Copies During the preapplication meeting, the GCAA will provide the applicants with an electronic copy of the applicable blank Conformance Checklists.

Applicants may submit their completed reports either in paper or electronic format.

#### Section 3 Instructions for Completion

The first page of each Conformance Checklist form (see blue box) contains the general instructions regarding the form which are further amplified in this Section.

#### 3.1 GENERAL GUIDANCE

The first 4 instructions are explanations of the handling of the completed conformance checklists-..

- 1) This document will be the primary record of applicant conformance. This document must be completely correct in order for the GCAA to issue the appropriate approval, authorization or certificate that is the goal of the specific certification process.
- 2) The applicant's conformance checklist must address all requirements at a subparagraph level (see examples). No requirement of the applicable directive may be deleted or left out of the document.
- 3) Each conformance checklist required for a particular certification must be submitted with the original formal application.
- 4) This document, when audited by the GCAA, becomes one of the official records that the applicant was certificated in compliance with international safety standards.



Failure to submit the applicable conformance checklists will result in the



immediate return of the formal applica-

These checklists provide the most effi-

cient means of ensuring conformance with the required directives both in

- Preparation of the applicant's manual system; and
- Subsequent conformance review by the GCAA.

#### 3.2 PROVIDING DIRECTIVE REFERENCES

A. The each directive conformance checklist will have 6 columns.

Part 15 SRR #	Requirement of the Regulation	AOC Manual Paragraph#	AOC Applicant Comments (If appropriate)	Status	Inspector
15.023	EXCEEDING FLIGHT TIME				
(a)	The Authority will consider a person in compliance with prescribed standards if he or she exceeds the prescribed flight time limitations when—				
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1) From the left, the first column will contain the specific regulatory requirement (SRR).

- 2) The second column will provide the specific text of the requirement.
  - The text of a directive requirement may be separated into 2 or more rows when additional requirements are embedded in the text. This ensures that all requirements have been addressed.
  - Headers that appear in directives, such as Subpart and directive headers, are provided as they appear in the directives.
- 3) The two center columns *color-coded (yellow)* where the GCAA expects the applicant to indicate how they will comply with the specific regulatory requirement by either—
  - (a) Entering a reference from a company manual in the "Manual Paragraph" column; and/or
  - (b) Entering a explanation in the "Applicant Comments" regarding the compliance or why compliance is not required.

More detailed guidance on making these entries is provided in the next paragraph.

4) The two far right green columns are reserved for the GCAA.

#### Section 4 Manual References are the Best

#### 4.1 EXAMPLE OF MANUAL REFERENCES

A. When possible, the applicant should provide a reference from his policy and procedure manuals.

Part 15 SRR #	Requirement of the Regulation	Manual Reference	Applicant Comments (If appropriate)	Status	Inspector
15.023	EXCEEDING FLIGHT TIME				
(a)	The Authority will consider a person in compliance with prescribed standards if he or she exceeds the prescribed flight time limitations when—	OMA 5.6.8 CSM 7.2.8			
(a)(1)	The flight is scheduled and normally terminates within the prescribed limitations; but	OMA 5.6.8 CSM 7.2.8			
(a)(2)	Due to circumstances beyond the control of the AOC holder (such as adverse weather conditions) are not expected at the time of departure to reach the destination within the scheduled time	OMA 5.6.8 CSM 7.2.8			

- B. In the example above, the applicant provides SRR references for the—
  - Operations Manual, Paragraph 5.6.8
  - Crew Scheduling Manual, Paragraph 7.2.8

#### 4.2 CORRESPONDING SRR CITES

- A. The applicant should ensure that it is possible for the reviewing GCAA inspector to find those references in the applicant's manuals system.
- B. This is accomplished by inserting SRR cities in the manuals.

Including the SSR cites in the manuals simplifies the—

- Development of a conformance checklist, and
- The GCAA review.

#### 4.2.1 EXAMPLE REFERENCE AT THE BEGINNING OF PARAGRAPH

- A. The following is an example of a SSR cite that may be inserted in a manual on the line above the beginning of the applicable paragraph.
  - "Reference: GCADs Part 09"
  - .....Start of Paragraph.....
- B. This method is recommended, but other methods (if accurate) will be acceptable.

#### 4.2.2 EXAMPLE REFERENCE INSIDE OF THE PARAGRAPH

The following is an example of a SRR cite within the applicable paragraph.

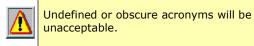
• "....end of paragraph. (GCADs Part 09)"

#### 4.2.3 EXAMPLE REFERENCE IN THE TITLE

- A. The following is an example of an SRR cite in the title—
  - "Header Title (GCADs Part 09)"
- B. The directive reference cite may be on the same line as the title or located directly below it.

#### 4.3 SUGGESTED MANUAL ACRONYMS

A. The use of acronyms in the "Manual Reference" column of the conformance checklists is recommended, provided those acronyms are defined and consistent.



B. Specific acronyms may be developed by the applicant, but must be defined in the applicant's application.

#### 4.3.1 OPERATIONS ACRONYMS

Examples of possible operations acronyms include—

- FOM Flight Operations Manual
- GOM General Operations Manual
- OMA Operations Manual, Part A
- CCM Cabin Crewmember Manual
- DPH Dispatch Procedures Manual
- CSM Crew Scheduling Manual
- FOTM Flight Operations Training Manual
- OMD Operations Manual, Part D
- RTG Route Guide
- OMC Operations Manual, Part C
- TPM Training & Procedures Manual
- DIM Deicing Program Manual
- WOM Winter Operations Manual

#### 4.3.2 AIRWORTHINESS ACRONYMS

Examples of possible airworthiness acronyms include—

- MCM Maintenance Control Manual
- MOPM Maintenance Organization Procedures Manual
- MTM Maintenance Training Manual

#### 4.3.3 AIRCRAFT TYPE-SPECIFIC ACRONYMS

Examples of acronyms associated with aircraft type-specific manuals and documents—

- AFM Aircraft Flight Manual
- OMB Operations Manual, Part B
- SOP Standard Operating Procedures
- CCC Condensed Cockpit Checklists
- QRH Quick Reference Handbook
- ACS Aircraft Systems
- ACP Aircraft Performance
- MEL Minimum Equipment List
- MBM Mass & Balance Manual

- MP Maintenance Program
- JTC Job Task Cards
- PBC Passenger Briefing Card

#### 4.4 PAGE VS PARAGRAPH NUMBERING

- A. Numbering of the chapters and paragraphs within a manual system is important. As much as practical, the manuals should be consistently numbering throughout the system.
- B. The applicant should carefully consider the use of consistent paragraph numbering in their manual system.
- A conformance checklist is generally better referenced when the manual system has consistently numbering.
- As much as possible, the conformance checklist should direct the user to the specific paragraph(s) where the SSR is embedded in the text.

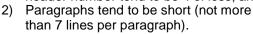
- C. Paragraph numbering—
  - 1) Is important in a flight safety documents system; and
  - 2) Provides for user-friendly access to the contents.
- D. Having an inconsistent numbering system from manual to manual within a company manual system makes it difficult for the—
  - 1) Users to access and use these aviation safety manuals; and
  - 2) GCAA to review and determine that the manual system is acceptable.

#### 4.4.1 TRIPLE HEADER PARAGRAPH NUMBERING

- A. Triple header paragraph numbering similar to that used in this advisory circular are the most acceptable numbering methodology.
- B. This type of header numbering provides a more specific accessing of the contents by the user.
- C. It also enables the applicant to be very specific in the conformance checklist as to where the policy/procedures regarding an SSR is located in the company manual system.

#### 4.4.2 SINGLE HEADER PARAGRAPH NUMBERING

- A. Having chapter numbers and single-level numbering within the manual system will be acceptable provided the—
  - 1) Total number of paragraphs under a
    - header number tend to be 4 or less; and





Manuals that have "repository" paragraphs (long, unbroken paragraphs) will not be acceptable.

B. The line and paragraph numbers cited here are goals, not absolute limitations.

#### 4.4.3 No Paragraph Numbering

- A. Some applicants may choose to use manuals that have only chapter numbers (no paragraph numbering).
- B. In these cases, the inclusion of SSR cites within the document will be very important to the GCAA review, because the only possible conformance checklist entries will have to be page numbers.



- It is difficult to review manuals without paragraph numbering
- Such manuals will be rejected if they do not include the manual reference

  sites

 Without the directive cites inserted in the document, it will be impractical to attempt to check the conformance.

#### Section 5 Organization Comment Entries

- A. The applicant should include a comment in the "Applicant Comments" column when the SRR is—
  - 1) Applicable, but no manual reference is provided, or
  - 2) Determined to be not applicable to the applicant.
- B. For maximum clarity, a comment in the "Applicant Comments" when the SSR is applicable, but the organization is requesting an exemption, waiver or special approvals.

## 5.1 Applying for Exemption, Deviation or Waiver?

Where an exemption, deviation or waiver to an SSR is being requested, the applicant should—

Part 15 SRR#	Requirement of the Regulation	Manual Reference	Applicant Comments (If appropriate)	Status	Inspector
.,	No person may schedule any flight crew member and no person may accept an assignment for flight time in commercial air transport, if that flight crew member's total flight time will exceed 1000 hours in any consecutive 12 calendar months period	OMA 5.6.7d CSM 7.2.7d	Anywhere Airlines has applied for an exemption to allow the total flight time of its flight crews not to exceed 1200 hours in any consecutive 12-month period		

- Insert the manual references which outline the proposed alternative requirements to the SSR;
- Insert an explanation in the Applicant Comments column advising that the alternative requirement is requested; and
- Where using the color-coded MS Word version of the conformance checklist provided by the GCAA, change the background color in those two cells to a distinct color, to emphasize the request.

Above example reads: "...Anywhere Airlines has applied for an exemption to all the total flight time of its flight crews not to exceed 1200 hours in any consecutive 12-month period..."



The Exemption request, completed as outlined in GCAD Part 1 must be filed with GCAA no later than the submission of the formal application.

#### 5.2 APPLYING FOR SPECIAL APPROVAL:

A. Where the GCAA will be expected to conduct a special review, such as a requests for computer record keeping as the primary method of record keeping, the applicant should—

Part 15 SRR#	Requirement of the Regulation	Manual Reference	Applicant Comments (If appropriate)	Status	Inspector
(a)	The AOC holder shall ensure that the required records for tracking flight and duty times and rest periods are maintained in a manner so that an updated record is available before a person begins their duty day or their first flight of the day	CSM 5.6a OMA 5.6.6 CCM 7.2.6	Anywhere Airlines is applying for use of computer recordiceping software and procedures as the primary method of tracking flight, duty and rest periods.		

1) Insert the manual references which outline the proposed special methodology to meet the SSR;

 Insert an explanation in the "Applicant Comments" column advising that the proposed is requested; and

The alternative methodology must be clearly outlined in the applicant's policies and proce- dures (manual reference).

Where using the color-coded MS Word version of the conformance checklist provided by the GCAA, change the background color in those two cells to a distinct color, to emphasize the request.

#### 5.3 Decision regarding Permissive Requirement?

- A. There are "permissive" requirements included in the directives. These are color-coded yellow in the MS Word conformance checklists provided by the GCAA. The applicant should their intentions regarding these types of directives.
- B. If the decision is not to take advantage of the permissive requirement, the applicant should—

Part 15 SRR#	Dequirement of the Degulation		Applicant Comments (If appropriate)	Status	Inspector
(b)	The Authority may approve a special flight duty scheme for an AOC holder		Anywhere Airlines does not intend (at this time) to apply for a special flight duty scheme.		

- 1) Insert an "NA" in the "Manual Reference" column; and
- Insert a statement in the "Applicant Comments" column indicating that this provision will not be requested by the applicant; and

Above example reads: "...Anywhere Airlines does not intend to apply for a special flight duty scheme..."

- 3) Where using the color-coded MS Word version of the conformance checklist provided by the GCAA, change the background color in those two cells to grey.
- C. If the decision is made to take advantage of a permissive requirement, the applicant should complete the SSR in the conformance checklist as outlined in paragraph 5.2 of this AC.

#### 5.4 DIRECTIVE NOT APPLICABLE?

Where an SSR is not applicable to the organization, that fact should be annotated in the conformance checklist in the following manner—

Part 15 SRR#	Requirement of the Regulation	Manual Reference	Applicant Comments (If appropriate)	Status	Inspector
APPENDIX 2 TO 15.033	ALLOWABLE FLIGHT DUTY PERIOD - SINGLE PILOT				
(a)	The maximum allowable FDP may be extended for single-pilot operations as provided in the following table—	NA	Anywhere Airlines does not plan to conduct single pilot operations.		

- 1) Insert an "NA" in the "Manual Reference" column; and
- 2) Insert a statement in the "Applicant Comments" column explaining the reason that SSR is not applicable; and

Above example reads: "...Anywhere Airlines does not plan to conduct single pilot opera- tions..."

 Where using the color-coded MS Word version of the conformance checklist provided by the GCAA, change the background color in those two cells to grey.

The color change will allow the GCAA to quickly review the "not applicable" answers for accuracy.

#### 5.5 A-1 = ACKNOWLEDGEMENT OF APPLICABILITY REQUIRED

Where the SRR outlines the applicability of the requirement and there are yellow color-coded cells, the applicant is expected to acknowledge that applicability by—

 Inserting "A-1" in the manual reference column (this indicates to the GCAA that the applicant is aware of the applicability); and

Part 15 SRR	Regulation Text	A P
SUBPART A	GENERAL	
15.001	APPLICABILITY	
(a)	This Part prescribes the requirements of the Republic of Ghana for the maximum duty periods, maximum fight time and minimum rest periods to ensure that fight drew and cabin drew members do not experience fatigue during AOC-related duties.	

2) Insert an acknowledgement statement in the Applicant Comment column, such as "...Anywhere Airlines, its crews and flight instructors are subject to the maximum duty, flight and minimum rest periods of Part 15...."

#### 5.6 A-2 = ACKNOWLEDGEMENT OF AN APPLICANT RESPONSIBILITY

Some SRRs provide specific information that is not necessary to include within the manual system, but should be acknowledged by the applicant. The following provides the method for that type of acknowledgement—

Part 12 SRR#	Requirement of the Regulation	Manual Re
	Amendments proposed by the AOC holder shall be made at least 30 days prior to the intended date of any operation under that amendment.	

- 1) Insert "A-2" in the manual reference column; and
- 2) Insert an acknowledgement statement in the Applicant Comment column, such as "...Anywhere Airlines understands that they must propose an amendment to the AOC operations specifications at least 30 days prior to the intended date of any operation under the amendment.."

# 5.7 A-3 = ACKNOWLEDGEMENT OF A REQUIRED GCAA ACTION

- A. On those requirements which state that an action by the Authority is necessary, such as "approval" or "acceptance," the applicant's answer must show that they understand the need for compliance with the SRR.
  - 1) Insert "A-3" in the manual reference column; and
  - Insert an acknowledgement statement in the Applicant Comment column, such as "...Anywhere Airlines understands that when we request an amendment, we cannot

Part 12 SRR#	Requirement of the Regulation	Manual Ref
	No person may perform a commercial air transport operation for which an AOC amendment is required, unless it has received notice of the approval from the Authority.	

begin operations under that ammendment until we received notice of approval from the GCAA.."

- B. A second example is provided for clarity of making this acknowledgement.
  - Insert "A-3" in the manual reference column; and
  - Insert an acknowledgement statement in the Applicant Comment column, such as "...Anywhere Airlines understands that when we rmay not operate a variant of an aircraft that has not been approved by the GCAA for our operations.."

	Part 12 SRR#	Requirement of the Regulation	Manual Re
ı	12.033	SUBSEQUENT CERTIFICATION REQUIRED	
	(a)	Unless addressed in the initial certification, subsequent requests for the following amendments to AOC operating authority for the following require completion of a full certification process prior to operations.:—	
	(a)(1)	Adding variant aircraft;	

#### 5.8 NR-PEL = REQUIRED FOR LICENCE KNOWLEDGE & SKILL TEST?

- A. Some directives require knowledge that is basic to the holder of a PEL licence. It may not be necessary for that information to be included in the organization's manual system, if it is clear that the employees, as holders of PEL licenses, should be aware of the requirement.
- B. In some cases, this will be obvious, such as a a basic airworthiness or operations requirement that applies to the PEL license holders involved— .

Part 10 SRR#	Requirement of the Regulation	Manual Reference	Applicant Comments (If appropriate)	Status	Inspector
10.017	AIRWORTHINESS CERTIFICATE: OPERATIONAL RESTRICTIONS				
(a)	No person may operate an aircraft except as provided in the terms of the airworthiness certificate or equivalent document issued by the State of Registry.	NR	This SRR is basic knowledge required for original qualification of the PEL license holders involved.		

Part 10 SRR#	Requirement of the Regulation		Applicant Comments (If appropriate)	Status	Inspector
10.220	CHANGES TO A FLIGHT PLAN				
(a)	When a change occurs to a flight plan submitted for an IFR flight or a VFR flight operated as a controlled flight, the pilot shall report that change as soon as practicable to the appropriate ATC facility.	NR	This SRR is basic knowledge required for original qualification of the PEL license holders involved.		

#### C. For these SSRs—

- 1) Insert an "NR-PEL" in the "Manual Reference" column; and
- Insert a statement in the "Applicant Comments" column explaining that the the SRR is basic knowledge for the PEL license holder involved; and
- Where using the color-coded MS Word version of the conformance checklist provided by the GCAA, change the background color in those two cells to grey.

Example above reads: "...This SRR is basic knowledge required for original qualification of the PEL license holders involved.

The color change will allow the GCAA to quickly review the "not applicable" answers for accuracy.

D. In individual cases, however, the GCAA may determine that some requirements, designated by the applicant as basic knowledge that should be known by the PEL license holder, must be included in the manual system. This decision will necessitate revision of the document to conform.

The applicant should consider meeting with the CPC early in the process of developing the conformance checklists to discuss the SRRs that may to possible to treat as prescribed in this paragraph.

#### 5.9 SPECIAL CITES: AIRCRAFT INSTRUMENTS & EQUIPMENT

- A. Normally manual references provided in Conformance Checklists are provided by paragraph number. (Page number will be acceptable where there is a bold header on the page which indicates the proper subject or the specific regulatory reference cites are properly located.)
- B. Part 6 (Instruments & Equipment) requires manual reference cites that can be taken from the—
  - Minimum Equipment Lists ATA numbers where these numbers show numbers installed (preferred method)
  - Aircraft Equipment List by page and paragraph number
  - Operations manual by page and/or paragraph number

#### 5.10 CONFORMANCE CHECKLIST EDITORIAL ISSUES

- A. When a conformance checklist is started, be sure to view the header and insert the business name of the applicant.
- B. Before submitting the conformance report, the applicant should insert the—
  - 1) Business name,
  - 2) Printed name of the accountable manager;
  - 3) Signature of the accountable manager; and
  - 4) The date the document was completed.

<ul> <li>THE MANAGEMENT OF THE AOC APPLICANT HEREBY CERTIFY THAT THIS IS AN ACCURATE AND COMPLETE RECORD DEMONSTRATING THE CURRENT CONFORMANCE WITH APPLICABLE PART 15 SECTIONS:</li> </ul>	
Air Operator Certificate Applicant:	Anywhere Airlines
Accountable Manager's Name:	James Johnson James Johnson
Date Submitted:	20/07/2009

C. After rejection/revision, the date of the revision on the re-submitted conformance checklist should appear in the date submitted" line.

#### Section 6 GCAA Review

#### 6.1 COMPLETELY ACCURATE CROSS-REFERENCES

- A. The goal is to have a completely accurate cross-reference of the SRRs that provides the applicant's—
  - 1) Manual system primary references for the applicable SRRs:
  - 2) Acknowledgments of applicability;
  - 3) Acknowledgements of responsibility;

- 4) Alternate proposals for exemptions and/or deviations; and
- 5) Special approval requirements.
- B. These conformance checklists, when completely accurate, are included in a Completed Certification Report that is retained by the GCAA to demonstrate that the applicant was in compliance with the applicable SRRs when they were issued the certificate of approval.

#### 6.2 REJECTED & REVISED CONFORMANCE CHECKLISTS

- A. The submitted conformance checklists will be audited for compliance with each SRR.
- B. Submitted conformance checklists that have inaccurate or insufficient references will be returned to the applicant and the conformance review will be terminated.



The GCAA document conformance review will not be conducted in the absence of accurate conformance checklist that correctly cross-reference the applicant's manual system.

- C. When the revised conformance checklists, and supporting manual revisions are resubmitted, the conformance review will begin again.
  - The conformance checklists will remain "In-Work" throughout the document conformance phase.
- D. Throughout the certification process, with emphasis on the document conformance phase, these checklists will ensure that, when the certification process is completed, the applicant and its manual system are in conformance with the applicable GCAD Parts.

#### 6.3 GENERAL GCAA APPROACH

- A. Assuming the applicant submitted a complete package of conformance checklists and documents, the certification team will use the following methodology—
  - 1) As early as possible in the document conformance phase, all of the regulatory conformance checklists will be evaluated in detail to ensure that the applicant's manual references and comments are correct.
  - 2) If not, these documents will be rejected and returned to the applicant. At this point the document conformance phase (and entire certification process) will be suspended pending the necessary revisions by the applicant.
  - The remainder of the document conformance phase cannot be accomplished in a timely manner until the manual system is determined to be in conformance with the applicable directives.



The GCAA document conformance review will not continue the document conformance phase if the regulatory conformance checklists are not correct!

- 4) After the Regulatory Conformance Checklists references and comments are found to be acceptable, the GCAA will continue to be alert for potential changes to the references as addition revisions to the affected manuals are necessary.
- B. The Regulatory Conformance Checklists are only considered to be acceptable as in-final for inclusion in the GCAA certification file after all manual revisions required in the document conformance phase have been finalized as acceptable.

At all points in the certification process where the conformance checklists is rejected or found

to be fully acceptable, a copy will be printed as

a PDF file and retained in the certification

### 6.4 FILING OF EACH SUBMITTED CONFORMANCE CHECKLIST

- A. The GCAA will retain a digital file copy of each conformance checklist that is submitted by the applicant, including those which are returned for revision.
- B. The copy that is accepted by the GCAAas an accurate copy will be retained a special certification "book" as evidence to international aviation authorities that the applicant completed a complete certification under the applicable aviation directives.

End of Advisory Circular