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Ministry of Land, Infrastructure, Transport and Tourism

Japan Civil Aviation Bureau

### Question & Answer (Q&A)

The Technical Standard to Prevent Objects Falling off Airplanes and The Detailed Regulations of the Technical Standard to Prevent Objects Falling off Airplanes

No.	Question	Answer
1	When will the standard be applicable to alteration of the operation plan?	Japanese Airlines: From January 15, 2019 Foreign Airlines: From March 15, 2019 However, it is supposed to apply for alteration of the operation plans within two weeks from the effective date. Therefore, for foreign airlines, it is actually applied from the summer schedule in 2019.
2	Do we need to apply in case that there is no alteration of the operation plan for application of summer schedule in 2019?	The Ordinance for Enforcement of the Civil Aeronautics Act was revised, and matters regarding preventing falling objects have to be described in the operation plan. In accordance with the standards, airlines that have obtained permission will have to submit contents related to falling objects prevention. In addition, for foreign airlines, it will be necessary to apply for alteration of the operation plans separately for the summer schedule in 2019 due to the effective date.
3	How can we review the revised regulations?	We distributed electronic data through e-mail to Japanese airlines and foreign airlines. You can also view it on our website.
4	In consulting with our authorities, we would like to ask JCAB to provide detailed materials to be distributed to each authority.	We have also prepared related regulations in English to distribute to the authorities in foreign countries.

5	Can you hold a briefing session for experts from now on?	We think that persons responsible for confirming to the standards are those of the quality assurance department and engineering department of the headquarters. We would like you to develop information in relevant departments of your headquarters. We are thinking of holding further briefing sessions if requested.
6	Are these technical standards ICAO standards? Or is it a Japanese original one?	It's our own in Japan.
7	We would like to ask JCAB to explain in the International Conference such as ICAO.	Including the ICAO and other international conferences, we will explain the establishment of the standards for the relevant countries to gain their understanding.
8	For an aircraft that are not subject to the standards, will it be unable to operate?	We understand that it takes time to modify, etc., and we believe that a certain grace period is necessary. However, we would like to ask you to prepare a maintenance plan in order to complete modifications and other corrective actions as soon as practicable in consideration of your production control, etc.
9	Is the form of the declaration form set in the standards?	For foreign airlines, it is exemplified in Form 1 of "Instruction Notice of Safety Review for Approval for International Air Transport Services by Foreign Nationals and Transport of Passengers and Cargos Departing from or Arriving in Japan (Related to safety)". For Japanese airlines, we have informed the examples in the same manner as the foreign airlines.
10	In the standard, "When delegating the implementation of the countermeasure to the outside, we must take measures necessary for the subcontractor to implement the countermeasure properly". Is it correct by understanding as follows? ▪ "Implement properly" means that the worker of the subcontractor recognizes that the work is a countermeasure against falling objects and carries out	As you understand, workers at contractors must recognize that they are measures to prevent falling objects and perform the work.

	<p>the work.</p> <ul style="list-style-type: none"> <li>▪ "Take measures necessary for the subcontractor"</li> </ul> <p>means that the worker should be made aware that the work is a countermeasure against falling objects.</p>	
11	How often is the SB list updated?	<p>Basically, we consider the international summer schedule / winter schedule every period.</p> <p>However, when the SB is issued as an effective countermeasure for serious cases, we plan to add it to the list every time, and will not be limited to every period.</p>
12	Which of the following is required when both SBs conducting repetitive inspections and SBs implementing refurbishment are issued?	Each operator should adopt and implement SBs that the operator thinks is more effective after conducting technical evaluation and examination.
13	Is it necessary to report to JCAB every time when it is impossible to repair due to the delay in parts supply, or if it is necessary to deal with beforehand without modifications?	If the cause of the problem is a common issue with the same aircraft type, you should share the information. However, if it is a rare individual case, it is not necessary.
14	When accomplishing the SBs in the list, is it acceptable to carry it out by the Compliance Time specified by the manufacturer?	<p>Technically, we would like to respect the Compliance Time specified by the manufacturer in the technical evaluation.</p> <p>However, since we believe that it is necessary to deal with this matter as soon as possible, we would like you to understand that you need to accomplish the SBs and operate as soon as possible.</p>
15	<p>Regarding the accomplishment of technical documents, if aircraft manufacturers and model aircraft are not listed in Appendix A-1 to A-6, how do airlines deal with it?</p> <p>When an aircraft manufacturer does not clearly specify technical documents effective for preventing falling</p>	<p>As you understand, it is not an obligation.</p> <p>However, as the technical evaluation of SBs received from the manufacturers, we would like you to aggressively adopt SBs that you believe are effective for preventing falling objects and provide us with the information.</p>

	objects in the list, does it mean that it is not necessary for the airlines to confirm whether all technical documents such as SB issued by the manufacturer comply with the purpose of this standard or not (not an obligation)?	
16	Our company operates airplanes not listed on the SB list. Do we have to individually ask the manufacturer and check SB, etc.?	We got responses from some aircraft manufacturers that there are no SBs, etc., effective to prevent falling objects. You do not necessarily confirm it individually, but if there are countermeasures to be considered as effective to prevent falling objects, we would like you to provide us with the information.
17	Although it is assumed that manufacturers approve alternative measures in the case of not adopting SBs, it is considered that it is substantially difficult to obtain manufacturer's approval as an alternative measure for the SBs. What should we do?	Since it is an alternative measure to technical documents (SB and SL, etc.) issued by the manufacturer, in principle, it is necessary for the manufacturer to approve or give some technical comments that an alternative measure is equivalent. We would like the operators to confirm the equivalence of a measure evaluated and examined as an alternative measure with the manufacturer and seek an approval or technical comments.
18	Will PMA parts be acceptable as alternative measures when SB is not accomplished?	An alternative measure for the accomplishment of the SBs shall be accepted by the manufacturers. Regarding the handling of PMA parts, we believe that they are prescribed in the maintenance manuals of each operator, and there is no hindrance in managing them properly according to the manuals.
19	As far as the SB is not specified as AD by the aviation authority, it seems that the operator will evaluate and decide whether to adopt it or not. Will JCAB not approve the alteration of the operation plan unless it is adopted?	The position of SB is as you recognized. However, it is necessary to accomplish the SBs listed or implement equivalent measures. If you don't adopt the SBs and implement equivalent measures, alteration of the operation plan will not be approved.

20	Is there a designation for inspection intervals of "other measures" prescribed in Appendix B?	We think that each operator reviews the intervals that it can inspect. There is no designation from the JCAB.
21	How often should I report on the analysis of Category III concerning actual dropout cases? If we analyze statistically, we need one year at least.	The frequency of occurrence is different for each operator, so the period cannot be treated in the same way. As a result of the analysis, if the cause determination and recurrence prevention measures are developed, we would like you to make a report at regular meetings, etc., every time.
22	Please clarify the scope of education and training, detail of contents, etc. (education and training especially for flight crews).	We assume something like class training or E-learning regarding countermeasures against parts departing from aircraft and ice blocks falling. We think that the areas prone to depart from airplanes should be checked with particular attention during Walk Around Check of your pre-flight check by flight crews.
23	Do persons who receive the education and training include cabin crews?	Since we assume that education and training for flight crews is during Walk Around Check, education and training for cabin crews is unnecessary.
24	Does the education and training apply to persons engaged in fuel refueling?	As for fuel refueling workers who operate refueling panels for servicing, we believe that it is necessary to implement education and training as ground handling staff.
25	We would like JCAB to clarify the scope of "person engaged in ground handling operations". Example: Water Service, Lavatory Service, Fuel Refueling, Cargo Loading, Catering Companies, etc.	Those who actually work by touching the aircraft are subjects. Education and training for persons who make the final confirmation after completion of the work is required at least.
26	Is the education and training only for employees at each station in Japan?	No, it is not only for the employees. It is also necessary for employees at the airport of departure to Japan.
27	Regarding education and training, is it correct for an understanding that recurrent training is not required under the new standards?	We believe that day-to-day enlightenment is important for countermeasures against falling objects; however on that standard, it is not essential to have regular training.
28	Does it need to include effect measurement (evaluation)	Under the technical standards, effect measurement (evaluation) is unnecessary.

	on education and training?	
29	Although it is enforced from January 2019 for Japanese operators, does education and training need to be completed by the date?	It is desirable that education and training for persons applicable can be completed as much as possible.
30	Regarding education and training, is it required to also carry it out on destinations of overseas charter flights and flights to overseas airports afterwards?	We believe it is desirable to implement it, but it is difficult to implement. Basically, it seems that the certified mechanic or engineer will be onboard charter flights, so we think that education and training should be implemented for the mechanic or engineer.
31	Is it required to implement education and training for airports where divert is expected?	We believe it is not realistic to conduct comprehensive education and training to persons who are in alternative airports. Basically, we think that certified mechanics or engineers will be dispatched to take off airplanes, so we think that education and training should be provided for the mechanic or engineer.
32	In carrying out education and training to a contractor who has consignments from multiple airlines, is it necessary to provide education and training to each operator?	Because the parts which tend to drop out are different from each types, we ask you to develop syllabus of education and training suitable for each. If types to be entrusted are the same, we believe that it is unnecessary to conduct the same training for each trustee as long as you can submit materials for the same type.
33	Is education and training necessary for heavy maintenance contractors? After heavy maintenance, the inspector of the operator carries out receipt inspection, so can't we substitute for that confirmation?	If the inspector of the operator carries out receipt inspection after heavy maintenance and it can be confirmed that there is no indication of PDA at that time, we believe that it is unnecessary to conduct education and training for heavy maintenance contractors.
34	Is the statement necessary for summer and winter seasonal alteration of the operation plan in applications?	For the statement, we don't think it is necessary to submit each summer or winter schedule applications. However, please be aware that it will be necessary to submit again when there is a change in the matters stated.
35	When will the foreign airlines that has already obtained a license for international air transport services apply for alteration of the operation plan regarding the	Foreign airlines must apply for alteration of the operation plan relating to falling objects prevention measures within two weeks from effective date (March 15, 2019).

	contents of the measures to prevent falling objects?	
36	When can application and pre-adjustment of approval for alteration of the operation plan be made?	<p>You can apply for approval of alteration of the operation plan from March 15, 2019, as detailed in the Supplementary Provisions.</p> <p>Regarding preconditioning, as soon as your application documents are ready, we do not mind at all times, so please contact the Air Transport Safety Unit.</p>
37	Is the statement required in the new standards necessary for each type of aircraft?	<p>Unnecessary.</p> <p>Create one document per operator and submit it.</p>
38	Do we need a statement every time we apply for permission under Article 130-2 of the Aeronautics Act?	Yes, you have to submit the statement.
39	<p>The signature of the application so far was made by a person belonging to the Japanese branch office.</p> <p>Does the statement under the new standards have to be signed by the headquarters (e.g., maintenance department)?</p>	You have to be responsible for signing (such as the president of the head office or the head of the quality assurance department) the content to be declared.
40	Is it possible to create multiple signatures of the statement if it straddles multiple departments?	<p>There is no problem with creating multiple.</p> <p>Please inquire about the statement of fragmentation in advance.</p>
41	<p>There are pilot licenses in the attached documents, but due to the handling of personal information, the judgment of the headquarters is necessary.</p> <p>We do not know if we can make it at the time of the application. Do we still have to submit them?</p>	If you do not make any special changes at the time of applying for alteration of the operation plan to prevent falling objects, you can submit only the matter related to measures against falling objects. It is not necessary to submit the pilot license section.
42	Although attached documents in the standards describe "a system to collect information on countermeasures against falling objects regarding Service Bulletins (SB LIST)", may we notify the headquarters via Japanese branch office?	We do not deny that the Japanese branch office collects information on technical documents, but we believe that the department that handles the whole will become the proper department of the headquarters.

43	What kind of criteria do you judge concretely "according to its shipping frequency?"	A numerical criterion is set according to operational performance of an operator who has obtained permission under Article 130-2 of the Civil Aeronautics Act for a certain period.
44	How do we count the number of flights in case of exceeding 103 charter flights per year?	The sum total of the following (a) and (b). (a) Number of flights to be scheduled in an application (b) Number of flights operated within 12 months before the application date, back from the scheduled final shipping application
45	Business charter companies contract with several agencies. As an agent, I don't know if it is exceeding 103 revenue flights per year or not.	Please contact the airline company and confirm the number of flights.
46	Our business permission is only seat sales (code share). Is it necessary to submit alteration of the operation plan for the new standards?	The standards apply to operators. If your business permission is only seat sales, it is not necessary.
47	Does the standard apply to foreign international air carrier the same as Japanese air carriers?	Exactly. There is no difference. The same standard is applied whether it is Japanese air carrier or foreign air carrier. However, a numerical criterion is set according to the operational performance of an operator who has obtained permission under Article 130-2 of the Civil Aeronautics Act for a certain period.