



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

**NOTICE
N 8300.123**

Effective Date:
8/3/06
Cancellation Date:
8/3/07

**SUBJ: EVALUATION OF AIR CARRIER MANAGEMENT DURING OFF-HOUR
ACTIVITIES**

1. PURPOSE.

a. This notice provides guidance concerning oversight of activities conducted by all Title 14 of the Code of Federal Regulations (14 CFR) part 121 air carriers (both Air Transportation Oversight system (ATOS) and non-ATOS) during off-hour periods. Off-hour periods include those times that are outside normal FAA duty hours, including weekends.

b. This notice contains procedures for evaluating a part 121 air carriers' ability to manage activities conducted during off-hour periods and provides guidance on the actions the FAA should take if moderate or severe risks are identified. The information in this notice provides instructions for determining off-hour surveillance requirements of non-ATOS air carriers. This notice also provides means of complying with the off-hour surveillance requirements in Federal Aviation Administration (FAA) Order 8400.10, Air Transportation Operations Inspector's Handbook, Appendix 6, "Air Transportation Oversight System" (ATOS).

2. DISTRIBUTION. This notice is distributed to the division level in the Flights Standards Service in Washington headquarters; to the branch level in the regional Flight Standards divisions; to the Flight Standards District Offices; and to the Regulatory Standards Division at the Mike Monroney Aeronautical Center. This notice is also distributed electronically to the division level in the Flight Standards Service in Washington headquarters and to all regional Flight Standards divisions and district offices. This information is also available on the FAA's Web site at <http://fsims.avr.faa.gov/fsims/fsims.nsf/> and on the FAA Web site at http://www.faa.gov/library/manuals/examiners_inspectors/8300/.

3. BACKGROUND. Oversight of part 121 air carriers requires insight into the entire range of activities performed by the air carrier. Since much of that activity is conducted during times that are not normal duty hours for FAA inspectors, the certificate-holding district office (CHDO) must make a conscious effort to ensure that the air carrier has the means and methods to ensure that procedures are being followed and that the air carrier continues to be in regulatory compliance at all times. Potential factors that could contribute to problems during off-hour activities include the possibility of diminished FAA presence, less-than-effective air carrier managerial oversight, non-availability of "expert" advice or other supporting resources (help desks, vendor support, etc.), incomplete exchange of information during shift change, personnel fatigue, and a range of other potential problems.

a. CHDO surveillance planning must result in a program that is capable of detecting deficiencies in air carrier performance no matter when the activity is conducted. Sufficient off-hour surveillance must occur to:

- Know what types and levels of activity are conducted during off hours
- Determine if the air carrier's processes and controls are sufficient to detect and correct any risks inherent with off-hour activities
- Determine if the off-hour activities present a greater risk than activities done during normal FAA duty hours

b. Based on information gathered during surveillance, the CHDO will be prepared to address identified risks.

4. ACTION. CHDO managers of 14 CFR part 121 certificates must require appropriate personnel to identify and record how much and what kind of activity the air carrier performs during off hours. Based on this information and the decision aid provided by this notice, CHDOs must evaluate an air carrier's ability to adequately manage its off-hour activities. The CHDO must take appropriate action to address any identified hazards, to include retarget/adjust the surveillance program, or other actions designed to address a specific, significant risk. Appendix 1 describes a process that can be used to prepare this evaluation.

a. Assessments of Specific Conditions. Appendix 2 contains a decision aid to help the CHDO assess the ability of the air carrier to address the hazards associated with off-hour activities. To properly complete the decision aid, CHDO personnel need to apply their own knowledge of the carrier along with their assessment as to the prevalence and magnitude of the issues. The decision aid is designed to assist in these assessments and subsequent action planning.

b. Recording Actions. CHDOs must record how much and what kind of activities are done off hours by or for the air carrier. ATOS Certificate Management Team (CMT) should follow the procedure and Order 8400.10, Appendix 6. Other CHDOs must record this information in Performance Tracking and Reporting Subsystem (PTRS).

c. Feedback. AFS-900 will solicit feedback from office managers and PIs after this notice has been in effect long enough to be used in the planning and execution of off-hour surveillance. The survey will address the effectiveness of this notice, the process it describes, and the decision aids it contains. If you want to make comments prior to the survey, please provide your comments via e-mail to the Flight Standards Safety Analysis Information Center (FSAIC) Manager at don.arendt@faa.gov.

5. INQUIRIES. Questions pertaining to this notice may be referred to Don Arendt, Manager, FSAIC, Flight Standards Certification and Surveillance Division, AFS-900 at (703) 661-0516.

6. DISPOSITION. The notice will be incorporated into Order 8400.10, Air Transportation Operations Inspector's Handbook, Appendix 6, for ATOS, and into the National Program Guidelines (NPG) Order 1800.56 for 2007.

ORIGINAL SIGNED BY
CAROL GILES for

James J. Ballough
Director, Flight Standards Service

APPENDIX 1. EVALUATION OF AIR CARRIER MANAGEMENT OF OFF-HOUR ACTIVITIES PROCESS

1. Purpose. This appendix provides guidance to CHDO managers on when to require use of the Off-Hour Surveillance Decision Aid, and how to process the results. There does not need to be an hour-for-hour correlation between the amounts of work the air carrier does off hours and the off-hour surveillance. However, the emphasis needs to be on identifying potential issues related to the air carrier's management and oversight of off-hour activities. This process and the associated decision aid will assist CHDO managers in answering the following questions concerning off-hour activities.

a. What types of air carrier activities are occurring during off hours and where are they occurring?

b. How is the air carrier managing and supervising off-hour activities, especially the interface with outsource maintenance and other contracted activities?

c. What problems may exist that are specific to off-hour activities, such as the coordination between shifts?

d. Does the existing surveillance program address these concerns?

This process is depicted in the process map on the following page.

2. Process Participants.

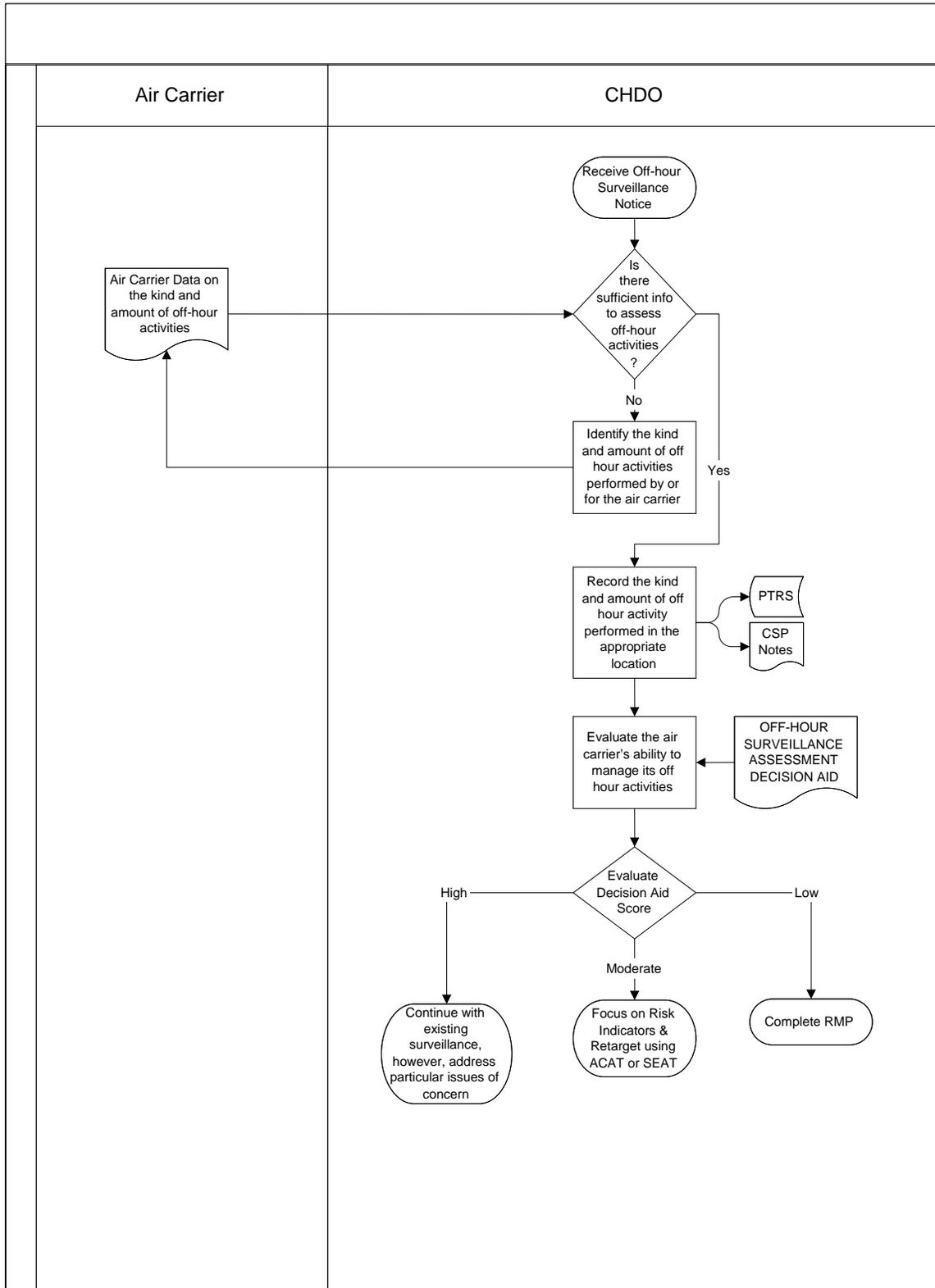
a. CHDO Manager and Principal Inspector (PI). The key participants in the Off-Hour Surveillance Assessment Process include the office manager and the PI charged with the oversight of an air carrier. These people are responsible for deciding how to anticipate or respond to air carrier risks, and to identifying what information they need to make these decisions. When faced with a potential problem associated with off-hour activities, these participants must decide if there is a critical problem that must be handled immediately and if these problems warrant adjustment of surveillance to allow the CHDO to focus on the most critical risks.

b. Air Carrier. The air carrier is a participant in this process as the overseen entity, but also as a potential source of information that feeds the evaluation process.

3. Process Procedures.

a. Initiate Process. Upon receipt of this Notice titled: Evaluation of Air Carrier Management During Off-Hour Activities, the CHDO will evaluate whether or not there is enough information about the type and amount of off-hour air carrier activities to make an assessment of the risks.

Off-hour Surveillance Air Carrier Oversight Process



(1) Evaluate Available Off-hour Information. CHDOs should review the Off-Hour Surveillance Decision Aid to identify what information they need to use the tool. PIs and Office Managers are also encouraged to use their experience with the air carrier and other data sources to evaluate the adequacy of information about off-hour activities. If there is not sufficient information about the amount and type of activities being conducted off hours by or for the carrier, then it is necessary to collect that information to make an informed decision about whether or not a significant problem exists. Depending on the type of certificate and the oversight system that applies, the CHDO should obtain the information using existing systems. Examples include:

- An ATOS CMT might consider using Element Performance Inspection (EPI) 1.3.7 for Outsource Maintenance and/or Element 1.3.4 for Required Items of Inspection (RII), and include in the special instructions the requirement to identify the amount and type of activities going on off hours at the repair station (or other outsource maintenance facility). A Constructed Dynamic Observation Report (ConDOR) may be needed to collect specific information about the carrier.
- Other CHDOs could use PTRS activities codes 3617, 5617, 3640, or 5640, as appropriate, to collect the needed information on outsource maintenance. Other PTRS activities may also be appropriate to review RII or other off-hour related activities.
- An ATOS CMT or a Surveillance Evaluation Program (SEP) CHDO may also contact the specific air carrier for information regarding their off-hour activities. This may include the types of activities occurring during off hours, location of off-hour activities, management and supervision of off-hour activities, and interface with outsource maintenance and other contracted activities.

(2) Reporting. For Non-ATOS CHDOs, the amount and type of activities being performed off hours should be recorded per National Flight Standards Work Program Guidelines, Order 1800.56F, Appendix 1, Section 6(3), page 23 use “OFFHOUR” in the “National Use” field. If other guidance requires use of “National Use”, place “OFFHOUR” in the “Miscellaneous Use” field. ATOS inspections that are performed off hours should have the term “OFFHOUR” in the National use block. This will allow a national look at the amount and type of inspections being conducted off hours.

(3) Recognize and Communicate Concerns. If a significant concern is discovered in the off-hour activities being performed by or for the air carrier, this must be communicated to the CHDO office manager or PI immediately. Once sufficient information is gathered to make the assessment, proceed with the process.

b. Evaluate the Air Carrier’s Off-hour Activities. All CHDOs are encouraged to use the Off-Hour Surveillance Assessment Decision Aid to evaluate the effectiveness of air carrier activities conducted off hours (see Appendix 2). This Decision Aid asks the user to match the capabilities of the air carrier to manage its off-hour activities or programs with a series of word pictures that address several dimensions. Each dimension results in a score, that when taken together, produces a scoring range that indicates the effectiveness of the operator’s off-hour activities.

c. Evaluate Decision Aid Assessment Scores. The score of the Off-Hour Surveillance Assessment Decision Aid reflects the relative ability of the air carrier to operate successfully off hours. The decision aid scores are used to determine the action to take to prompt the air carrier to manage the risk appropriately and whether or not retargeting of surveillance is necessary to validate air carrier performance in identified areas of risk.

(1) Initiate Risk Management Process. A low decision aid (8-40) score reflects an inadequate capability to manage off-hour activities, and requires the initiation of the SEP or ATOS Risk Management Process (RMP) that targets the specific off-hour hazards and creates an action plan to address the related risks. The action plan generated by the RMP will be tracked and closed by PIs.

(2) Retarget Surveillance. A moderate decision aid (41-56) score indicates that the air carrier has only a moderate ability to manage off-hour activities, and surveillance plans should be retargeted to closely monitor this condition. Complete an Air Carrier Assessment Tool (ACAT) or Surveillance Evaluation Assessment Tool (SEAT) to develop a surveillance plan that concentrates on the elevated risk areas.

(3) Continue Current Surveillance Program. A high decision aid (57-80) score indicates the air carrier's ability to manage off-hour activities is considerable, and the existing surveillance program should be continued. However, if particular issues of concern exist, then they must be addressed.

4. Decision Aids. The Off-Hour Surveillance Assessment Decision Aid is attached as Appendix 2.

APPENDIX 2. OFF-HOUR SURVEILLANCE ASSESSMENT DECISION AID

1. Introduction. The following conditions or events may be indicators of need for additional off-hour surveillance. Particularly where multiple indicators or multiple examples of single indicators are observed, inspectors should consider more in-depth inquiries with air carrier management or targeted off-hour surveillance to determine possible impacts on affected programs or air carrier systems.

The Off-Hour Surveillance Assessment Decision Aid evaluates the effectiveness of air carrier activities conducted during off hours. This Decision Aid asks the user to match the air carrier’s activities or programs with a series of word pictures that address several dimensions. Each dimension results in a score that when taken together produces a scoring range that indicates the effectiveness of the operator’s off-hour activities.

2. Instructions. For each of the eight questions below, rate each question based on information available and your knowledge of the certificate holder. Once all questions have been answered, utilize the table on the last page to determine the results of this assessment.

a. Amount, Complexity and Type of In-House Activities (includes operations, maintenance and ground).

1. Amount of activities conducted at off hours.
2. Complexity of activities conducted at off hours.
3. Type of activities conducted at off hours.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder’s off-hour activities are acceptable.

b. Amount, Complexity and Type of Outsourced Activities (includes operations, maintenance and ground).

1. Amount of outsourced activities conducted at off hours.
2. Complexity of outsourced activities conducted at off hours.
3. Type of outsourced activities conducted at off hours.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder’s off-hour outsourced activities are acceptable.

c. Facilities.

1. Adequacy of off-hour in-house maintenance facilities (e.g., lighting, HVAC, working on ramps, etc.).
2. Adequacy of off-hour ground handling and servicing facilities.
3. Adequacy of off-hour outsource maintenance facilities (e.g., lighting, HVAC, working on ramps, etc.).

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder has adequate facilities (both in-house and outsource).

d. Supervision and Maintainers (In-House).

1. Reduction of off-hour supervisors.
2. Qualifications and expertise of the off-hour supervisors.
3. Reduction of non-supervisory off-hour personnel.
4. Qualifications and expertise of non-supervisory off-hour personnel.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three or more of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder has a very stable and qualified off-hour workforce.

e. Supervision and Maintainers (Outsourcing).

1. Effective oversight of off-hour outsourced activities.
2. Adequate oversight of off-hour outsourced activities.
3. Adequacy of the number of off-hour contracted personnel.
4. Qualifications and expertise of off-hour contracted personnel.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three or more of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder has a stable and qualified off-hour contracted personnel. Additionally, the certificate holder has adequate and effective oversight of outsourced activities.

f. Air Carrier Management and Oversight.

1. Adequacy of the operator's off-hour maintenance inspection department/system.
2. Adequacy of the operator's maintenance of its Continuing Analysis and Surveillance System (CASS) Audit and Performance Monitoring System.
3. Effectiveness of changeover procedures.
4. Effective management of off-hour maintenance controlled through supervision, training, shift change over and RII.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three or more of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The air carrier management and oversight processes are stable.

g. Current Compliance Status.

1. The level of operator's cooperative relationship with the FAA certificate management team.
2. Compliance culture of the operator.
3. Number of airworthiness regulatory enforcement actions.
4. The results of Safety Performance Analysis System (SPAS) indicators.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three or more of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder is compliant.

h. Training.

1. Adequacy of air carrier's training provided to off-hour maintenance, operations and ground personnel.
2. Effectiveness of air carrier's training provided to off-hour maintenance, operations and ground personnel.
3. Adequacy of air carrier's outsourced training provided to off-hour maintenance, operations and ground personnel.
4. Effectiveness of air carrier's outsourced training provided to off-hour maintenance, operations and ground personnel.

Score	Word Picture
1-2	Concerns exist about the certificate holder regarding three of the above issues.
3-5	Concerns exist about the certificate holder regarding two of the above issues.
6-7	A concern exists about the certificate holder regarding one of the above issues.
8-9	A minor concern exists about the certificate holder regarding one of the above issues.
10	The certificate holder is adequate and effective off-hour training program.

3. Overall Score. After all the questions have been answered, add all the scores to obtain the overall score. Using the table below, determine what actions are necessary to ensure adequate surveillance is being planned for the operator.

Overall Score	Actions
8-40	The operator seems to have major issues with off-hour activities. Begin a Risk Management Process immediately and closely track all issues of concern.
41-56	The operator seems to have some issues with off-hour activities. Utilize an ACAT or SEAT to further determine a course of action.
57-80	The operator does not seem to have any issues with off-hour activities. However, if particular areas of concern exist, then those must be addressed.