SOC

Safety Oversight Circular

U.S. Department
of Transportation

SOC **07-01**
DATE: June 1, 2007

**Federal Aviation
Administration**

**Air Traffic Safety
Oversight Service (AOV)**

Subject: **Acceptance of the Air Traffic Organization (ATO) Baseline**

1. PURPOSE: This safety oversight circular (SOC) provides information on what is meant by the Air Traffic Safety Oversight Service's (AOV) acceptance of the National Airspace System (NAS) Baseline. Additionally, it provides guidance on defining the March 14, 2005, baseline with regards to managing NAS changes.

2. BACKGROUND: FAA Order 1100.161, Air Traffic Safety Oversight, Paragraph 5-1, states that "At the time of original implementation of this order [March 14, 2005], the current status of the National Airspace System (NAS) was accepted as the baseline." Divergent interpretations of this section have been raised by those working on changes to the NAS. This SOC provides guidance on how to interpret what constitutes the accepted baseline. It also provides guidance on how to manage future changes to the NAS during the transition period and thereafter.

3. DISCUSSION:

a. On March 14, 2005, FAA Order 1100.161 accepted the NAS as the baseline for safety oversight. The following items were considered part of that acceptance: all safety standards contained in written orders, directives, and procedures; airspace, and surface areas under the control of Air Traffic Organization (ATO), and current navigational and air traffic control systems. Acceptance of the baseline did not imply or state that the NAS was or was not inherently safe as configured on that date, nor did it imply that the NAS had no existing high risks. The acceptance of the baseline simply meant that, henceforth, compliance with the Safety Management System (SMS) is required for all changes to the NAS. Thus, from that point forward, the use of Safety Risk Management (SRM) to assess all changes to the NAS was established, with the goal of full SMS implementation by March 14, 2010.

b. The intent of the order was to set a starting point from which to begin deliberately tracking and documenting changes to the NAS. From a practical standpoint, it was not feasible for AOV to inventory or assess each item, area, or element of the NAS for risk. The magnitude of such an effort would have overwhelmed ATO and AOV and might never have been possible. However, FAA Order 1100.161 directs AOV and the ATO to make and approve changes to the baseline on the basis of an approved SMS. Documented legacy processes were accepted during the transition, as part of the baseline, with the understanding that once SRM training had taken

place[1], personnel involved with NAS changes would make subsequent changes using the documented SRM processes approved in the ATO SMS. This means that hazards contained within the March 14, 2005, accepted baseline are not grandfathered in any way and, if detected or identified as high risk, must be mitigated to an acceptable level[2] and as low a level as reasonably possible in accordance with SMS requirements.

4. DISPOSITION: This guidance does not constitute a change to any requirement contained in FAA orders, manuals, etc. However, appropriate standard operating procedures should be changed to reflect the processes defined in this SOC. Adherence to this guidance will facilitate AOV approvals.

5. GUIDANCE:

a. Baseline The acceptance of the baseline did not imply or state that the NAS was or was not inherently safe as configured on March 14, 2005, nor did it imply that the NAS had no existing high risks. The baseline for oversight simply indicated that, thereafter, changes to the NAS would need to be SMS-compliant. Thus, the use of SMS to assess all changes to the NAS was established, with the goal of full SMS implementation by March 14, 2010.

b. NAS Changes

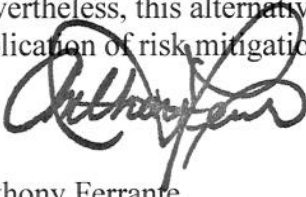**(1)** For major and infrequent changes to the NAS, follow the SRM process in the approved SMS manual.

(2) For NAS changes that are frequent and already described in applicable directives (e.g., yearly air show waivers, routine maintenance, etc.), it may or may not be practical to undergo the full SRM process for each change. In those instances, the ATO may, prior to March 14, 2010, perform the following:

(a) Ensure that directives concerning changes to procedures, airspace, waivers, and the like are revised to include a chapter or section on how to make changes to those processes and ensure that safety risk is meaningfully considered in accordance with the requirements in the approved ATO SMS manual. Once the revision is approved, as long as the process is followed, there is no need for a Safety Risk Management Document (SRMD) or Safety Risk Management Document Memorandum (SRMDM) for each individual change. Instead, the basic directive needs to go through the SRM process and a determination made that the order is SMS-complaint. Thereafter, so long as the order is followed for each change and approved controls to known hazards are implemented as necessary, those changes are considered SMS-compliant and do not require additional documentation.

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[1] This training should be provided as soon as possible to enable all of ATO to fully implement SMS by March 2010.
[2] Nothing is this statement changes the requirements in the AOV-approved ATO SMS manual for SRM documentation to identify and evaluate hazards and for the appropriate authority to accept any residual risk.

(b) Such approved directives constitute an extension of ATO's approved SMS program and require AOV approval for initial compliance and all subsequent changes. Nevertheless, this alternative can significantly enhance efficiency and ensure consistent application of risk mitigation across the NAS.

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