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Some Truths About SMS (Don't Shoot Me, I'm Just The Messenger)

I have been reading a plethora of articles of late that have been presenting SMS in a candy-coated, cure-all solution to aviation's problems. While I agree that an operational SMS can be an effective brain center for the safe operation of an aviation service provider I think we also need to frame the realities of what could be a bumpy ride enroute to the SMS destination for many companies. What follows is a brief list of some SMS realities and challenges that you are likely to face as SMS slowly becomes a reality for your aviation organization.

Size and Scope

In these preliminary stages of SMS implementation in the United States there seems to be much ado concerning what a fully operational SMS should "look like." The so-called Four Pillars of Safety, the framework of SMS, are based on standards and recommended practices that have been developed and time-tested in some of the more proactive aviation safety cultures (i.e., United Kingdom, Australia, and Canada). Regardless, there have been wide variations of opinions regarding the size and scope of an SMS program. There appears to be much consternation among safety managers of both large and small companies as they try to ensure that their SMS is fitted properly to their operation. Large companies argue that an SMS will create the need for additional departments and human resources in order to manage the myriad of safety data that will need to be collected, analyzed, and acted upon. In turn, these companies may

view SMS as an additional expenditure with difficulty selling the program to the CEO from an ROI perspective. On the other hand, small companies argue that most of the information available for SMS implementation is geared towards large operators and for the most part wholly inapplicable to a small flight department such as a one aircraft, two pilot Part 135 operation. In the case of the latter it's easy to understand this concern. However, it should be kept in mind that the SMS framework that is applicable to the large operator is still applicable to the small operator. The major difference is that there will be fewer people involved in fewer positions related to the SMS. There will also be a much more compact risk management system and data collection/analysis process.

We Already Have an SMS

I hear this all the time. Many companies claim they have an SMS by virtue of the fact that they have a flight operations manual, follow the regulations, provide training, etc. The logic makes sense and to a certain extent these companies do have a quasi-SMS. However, the difference between a quasi and a true SMS is that the latter, in addition to a few extra requirements, ties all of your safety components together to become your *formal* safety management system.

Interface Issues with the FAA

Have you ever experienced a situation where there was a difference of opinion between POI's, PMI's, PAI's or even entire FSDO's regarding a safety or approval issue? An example would be your maintenance company moving from one FSDO jurisdiction to another. Your original FSDO had no problem with the way you conducted your Part 145 repair business yet the new FSDO finds many discrepancies in your paperwork and issues a temporary suspension of your

Certificate. Although this would raise a good fundamental question—was the old FSDO just too lax or is the new FSDO really sharp?—I'll save that topic for another article.

The point is, just like the example above, companies appear to be experiencing interface issues with the FAA regarding their SMS. Invariably there will be different interpretations of SMS requirements across PMI's. In fact, there can be significant amount of variance. This lack of standardization can be frustrating but it likely will not get better any time soon. Venting your anger at your PMI or FSDO will not help to implement your SMS any quicker. You should work closely with your PMI to fully understand his or her requirements and expectations and develop your SMS accordingly.

<center>An SMS Manual Makes Not an SMS</center>

Many operators appear to developing the mindset that an SMS is simply a manual that sits on the shelf. In fact, I recently saw an aviation association promoting its SMS manual template that just needs to have some blanks filled in and names inserted. This manual was being touted as "shelf ready and supported by the FAA." But this brings up another good fundamental question; is the industry insinuating that simply having an SMS manual is an actual SMS? It's not, but many operators are trying to rationalize it that way. This myopic approach may due to a number of reasons such as:

• Lazy—using the SMS manual as your SMS is an easy way out. Tempting, but that's just not going to work.

• Attitudinal—the safety manager's attitude towards SMS is one of "who needs this? or what's the point?" This attitude may be exacerbated by the manager viewing SMS as another (soon-to-be) regulatory requirement that will just tie up human and financial resources. Or, the perceived importance is diminished by other, seemingly more important issues.

• Lack of knowledge—the well-intentioned safety manger simply does not have all of the facts and information regarding the overarching framework and underlying components of a real SMS (as opposed to a paper SMS). In this case the manger may have the right attitude or mindset but simply does not have all the required information or guidance. When it comes to SMS, knowledge is definitely power.

Whichever the case, we need to clearly understand that an SMS is *not just a safety manual*. The manual itself should be regarded as the main "go to" document where all of the components of the working SMS can be referenced. You cannot just buy a generic manual, fill in the blanks, and call it an SMS, regardless of the size of your company. The proper order of precedence is to conduct your GAP Analysis first and then develop your SMS manual concurrently with your actual SMS. Doing it any other way may be putting the cart in front of the horse.

Conclusion

Hopefully this article has shed some light on some of the less-discussed elements of SMS implementation. As you might imagine, there are many other issues I could have discussed but space does not allow such inclusion. However, the issues that were mentioned seem to be some of the most problematic, at least at this point of SMS implementation in the United States. Oh, and remember, I am just the messenger!