



PART 139 SMS IMPLEMENTATION PILOT STUDY FINAL REPORT

AUGUST 16, 2011

INTRODUCTION

A “Safety Management System” (SMS) is a systematic, comprehensive, and organized approach to managing safety that includes the necessary organizational structures, accountabilities, policies and procedures. An SMS will:

- Identify safety hazards.
- Ensure that remedial actions necessary to mitigate the risk/hazards are implemented, monitored and regularly assessed to enhance overall safety in the Air Operations Area (AOA).

The SMS, therefore, is a data driven, business oriented approach to managing safety. The SMS program sets goals, implements policies, develops processes, then tracks and measures performance. It focuses on organizational safety, rather than strictly conventional health and safety issues. Hartsfield-Jackson Atlanta International Airport is taking a proactive approach to establishing a general SMS framework with the Federal Aviation Administration (FAA) by participating in the SMS pilot studies. This document will present the Airport’s pilot study findings from three safety risk assessments that were conducted, the tasks required by the FAA under the study, and the benefits and challenges an SMS program will bring to the Airport.

The use of SMS can help airports detect and correct safety problems before they result in accidents or incidents. At Hartsfield-Jackson Atlanta International Airport (ATL) the SMS initiative will support the strategic priorities of *enhancing the customer experience* and *optimizing operational efficiencies*.

SMS PILOT STUDIES BACKGROUND

The FAA has adopted the principles of SMS for aviation safety, and the agency’s Airports Division are working to develop SMS guidance for airports. As part of this effort, ATL and other airports initiated pilot studies to determine the appropriate scope and detail of said guidance. The pilot studies encouraged and assisted airports in developing an SMS program, and to share their experiences and practices with other airports and the FAA.

Part 139 Implementation Study

The FAA’s Office of Airport Safety and Standards conducted a Part 139 SMS Implementation Study, as a follow-on to the Airport SMS Pilot Studies. The intent of the implementation study was to examine how airports implement the elements of the Safety Risk Management and Safety Assurance components throughout their airfield environment (movement and non-movement areas). The implementation study evaluated the validity of original SMS deliverables developed during the airport pilot studies. Airport sponsors shared the results of all tasks with the Office of Airport Safety and Standards. Results of the implementation study assisted the FAA in the development of standards and guidance related to Airport SMS throughout the nation.

SMS Pilot Study Benefits

The use of SMS at ATL can contribute by increasing the likelihood that Airport tenants will detect and correct safety problems before resulting in an aircraft incident or accident. The SMS will allow the Airport to achieve a realistic and efficient balance between safety and operations. Perhaps most importantly, ATL will be at the forefront of the upcoming mandatory FAA SMS requirement for all airports.

ATL participated in the first FAA Airport SMS Pilot Study that assisted the FAA with the data collection necessary to develop the SMS framework for rulemaking. ATL currently has a Draft SMS Manual that explains how to conduct the SMS program, an Implementation Plan that explains the phased approach of implementing the SMS program, an SMS Logo, and an SMS Working Group.

The Department of Aviation completed the six tasks outlined in the SMS Pilot Study Participant Guide. Below is an explanation of how ATL accomplished each of the study tasks. Refer to the Safety Risk Assessment Reports and Data Collection Report previously submitted to the FAA SMS Program Office for more detail.

PART 139 IMPLEMENTATION PILOT STUDY TASKS

TASK # 1:

Implement Safety Risk Management (SRM) procedures, processes or policies as formulated under the Airport's SMS Manual or other documentation developed for the Airport under the first pilot study.

The Air Traffic Organization Safety Assurance Group Eastern Region assisted ATL with facilitating two Safety Risk Management (SRM) panels: Vehicle Traffic on the Ramp, and Taxiway Dixie Conversion-NLVR Crossing. The Safety Assurance Group provided their expertise throughout the safety risk assessment process. The Safety Assurance Group provided resources that were used in the risk assessments, the Preliminary Hazard Lists (PHL) and the Preliminary Hazard Analysis (PHA). These SRM tools and resources were incorporated into our SMS program. The Safety Assurance specialist provided SRM Training to panel members to familiarize them with the safety risk management process.

The SRM panel is an important resource for an external risk assessment, with experts available to conduct a risk assessment. By involving panel members with varying experience and knowledge, it results in a broader, more comprehensive and balanced consideration of safety issues than an individual assessment. The following is a recommended process for the SRM Panel:

- a. Individuals use the group session to generate ideas and undertake a preliminary assessment only (perhaps identifying factors that are important, rather than working through the implications in detail).
- b. A subset of the panel, with sufficient breadth of expertise to understand all the issues raised and a good appreciation of the purposes of the assessment, will collate and analyze the findings after the session. The person who facilitated or recorded the session often is most able to perform this task.
- c. The individuals who collate and analyze the results present them to the group to ensure that the input has been correctly interpreted. This also gives the group a chance to reconsider any aspect once they can see the whole picture.

ESIS Insurance facilitated the second risk assessment, data analysis, and provided the Preliminary Hazard Analysis (PHA) Tool. ESIS introduced a new concept and approach to conducting a Safety Risk Assessment, while still following the FAA five-step SRM process. ESIS introduced a sixth step in the risk assessment process, which is Risk Management and is discussed in more detail later in the report. A representative from ESIS, Inc. Health, Safety and Environmental Services, provided a three-hour SRM training session for members of the ATL FOD Committee in preparation for the formal risk assessment meeting on August 12, 2010. The SRM training was provided to further assist with Safety Management System program goals.

The following revisions were applied to the SMS Manual SRM Section:

- a. Risk Matrix with the severity and likelihood tables overlay.
- b. Added sections for SRM panel.
- c. Added sections for internal and external risk assessments.

- d. Incorporated ESIS's risk assessment process with the hazard categories, hierarchy of controls, and control validation.
- e. Added an appendix with SRM resources and tools.
- f. Added the Preliminary Hazard Analysis (PHA) and Preliminary Hazard Lists (PHL) brainstorming tools in an appendix.

Risk Matrix Revision

The following revisions were applied to the risk matrix:

- The risk matrix was improved to provide a more comprehensive picture for analyzing and assessing risk. The likelihood table had the qualitative column added to provide a more accurate picture of assessing frequency of a particular event. ATL learned there does not need to have a large amount of historical data to validate frequency. If no historical data is available, another way to estimate risk is to gather a group with expertise in the relevant areas to independently rate the risk through a qualitative process.
- The risk matrix in the SMS Manual was separate from the severity and likelihood tables, required more work in analysis and assessment. The idea of overlaying the severity and likelihood tables on the risk matrix provided a greater ease of readability. This allowed ATL to analyze and assess the risk more effectively with one figure to examine the big picture.
- Terms and definitions were changed to provide more clarity and appropriate understanding when analyzing and assessing risk. The SMS expert from ESIS Insurance identified that the Risk Matrix had some gaps, which did not capture the big picture. With these changes, the risk matrix provided a comprehensive analysis and assessment process to evaluate risk more effectively.
- Definitions to the "Airport Reputation" were made to include stakeholders and businesses that were not considered in the previous Risk Matrix.
- The risk ratings were changed to Low (Mitigation may not be necessary), Moderate (Mitigate on a priority basis), and High (Mitigation is required) because these were more appropriate, in part, for legal liability reasons. Examples were added to provide more clarity as to what actions would be required with risk rating in regards to controls.

TASK # 2:

Conduct at least three safety risk analyses/assessments within 6 months of AIP grant award or study start. These analyses/assessments should not include those required under FAA Air Traffic Organization SMS. The analyses/assessments can address hazards in the movement or non-movement areas of the airport.

A. Vehicle Traffic on the Ramp External Risk Assessment

The SMS Working Group conducted the first external risk assessment with an SRM Panel that addressed vehicle traffic on the ramp. The Air Traffic Organization Safety Assurance Group Eastern Region assisted with facilitating the SRM Panel. The panel convened on April 5, 2010 for a six-hour session. The panel reconvened on May 17, 2010 for a three-hour session to complete the risk assessment process.

The intention of the risk assessment was to learn from the process, find gaps in the process that might not have been discovered, improve the documented process, and increase the tools and resources to be used for future risk assessments.

The SRM Panel members stated that sufficient data is needed for effective decision making when evaluating risk and establishing strategies to mitigate risks. The panel members also stated a need for a process/protocol to be developed for the Airport and its business partners to share responsibility in

decision-making, evaluation, and acceptance or mitigation of risks. This is not documented in the Advisory Circular or in the Airport Cooperative Research Program (ACRP) SMS guidebook.

B. Foreign Object Debris (FOD) External Risk Assessment

The SMS Working Group and FOD Committee conducted a second external risk assessment with an SRM Panel that addressed Foreign Object Debris (FOD) in fulfillment of draft Advisory Circular 150/5210-23, Airport Foreign Object Debris Management.

In preparation of the FOD SRM Panel, ATL identified several data resources to evaluate major issues and hazards that would be used in the preliminary hazard analysis tool. The following data resources were needed or available to complete the risk assessment.

Documents/Data Needed or Available:

- FAR Part 139 daily inspections by Department Of Aviation (DOA) Airside Operations
- Frequency of repair of paved areas
- FOD inventory (not easily available)
- FOD walks (collection from Friday July 23, 2010 Concourse A FOD walk)
- Air Traffic Control call logs to Airside Operations on FOD reports
- FOD Damage – Provided by Air Tran and Delta Air Lines based the previous 5 years
- FOD Injuries
- “FOD Boss” Schedules/Frequency of Use/Locations - (Other vacuum/sweeping schedules would be helpful as well.)

The above data provided the basis for analysis in determining the hazards related to FOD accumulation. The data was used to populate the hazards in the Preliminary Hazard Analysis Tool for the SRM Panel. The data was used by the SRM Panel to conduct an analysis of the hazards to determine risk.

During the FOD SRA, ESIS introduced a sixth step to the SRA process which is Risk Management-Validate/Control Implementation (Inspect, Test, and Observe; Measure success and/or failure) and Risk Reduction (Continually improve via hierarchy of controls). This step provides the comprehensive process for measuring the effectiveness of the mitigated controls.

C. Taxiway Dixie Conversion-NLVR Crossing Risk Assessment

An SRA was identified with the new Concourse F international terminal. Delta Air Lines proposed a vehicle crossing between Ramps 6 and 8 for baggage transport and other ground vehicle traffic. A portion of Taxiway Dixie would need to be converted to a taxilane between Ramp 6 North and Taxiway Lima. A safety risk assessment was conducted by the Airport to identify the potential hazards and risks for the Taxiway Dixie conversion to a taxilane and the addition of a non-licensed vehicle road (NLVR) crossing for the proposed taxilane.

The SRA was conducted by a principal stakeholder panel on May 5, 2011 in a six-hour session. The Panel reconvened on Thursday, May 26, 2011, for a three-hour session. The objective of the meetings was to achieve a consensus from panel members on the corrective actions of the seven hazards and the associated risks that were previously outlined in the Preliminary Hazard Analysis Tool.

Refer to each risk assessment report for more detailed information.

TASK # 3:

Implement a safety reporting and/or data collection system or applicable processes in conformance with the Airport's SMS Manual or other documentation developed for the Airport under the first pilot studies.

For the purpose of this study, ATL used the existing data collection systems such as mandatory incident reports, the wildlife hazard tracking database, the FOD Database, Clean Sweep documentation and the self-inspection program, which is mentioned in the SMS Manual. The SMS Working Group collaboratively worked with Airport Operations in sharing their safety data to fulfill the requirements of task # 3.

The Department of Aviation purchased a compliance database program that became operational September 1, 2010. The Airport Security and Operations Compliance System (ASOCS) is a computer-based program, which will allow multiple divisions of the Operations, Maintenance and Security team to manage operational information. ASOCS will provide a computer-based means to document all airport inspections and incidents, manage the Part 139 compliance process, document calls for service, issue Notices to Airmen (NOTAM), and store operational and activity data for the facilities. This program is used on a 24/7 basis, and serves as the official log of activities occurring at the Airport. ASOCS will also allow for a simple means of data research, and report generation as well as provide an easily accessible and searchable, yet secure, server-based database of information.

With the implementation of ASOCS, team members will be able to complete daily activity logs in a more streamlined way. Due to the server-based nature of the program, an unlimited number of users can be logged into the system at one time, all inputting separate data. This same feature, also allows an unlimited number of groups to keep separate duty logs, thus increasing the amount of data captured. All information input into ASOCS is easily searchable, and can be put into customized report formats. Being able to do quick and precise searches will reduce the time used to search the current form of log entries and provide more accurate data. The search and reporting features can also be accessed remotely through a secure internet connection.

Because ASOCS has a built-in forms designer, each group can create their own forms, customizing them to their specific needs. All forms designed have the ability to allow attached pictures or other documents. Each created form also has the capability to utilize a built-in GIS based map, allowing accurate location tracking trend analysis at such locations. This will help the Operations, Maintenance and Security team members to better identify where a problem is or may occur.

The ASOCS web solution currently provides:

- Tracking of unlimited amounts information through a common interface
- Forms designer - allows flexibility in adding any future data elements
- Information portal to present summarized data to management
- Trend analysis capabilities utilizing graphs and reports to show recurring issues
- Custom report writing
- Data mining capabilities - used to search for occurrences to common words/phrases
- News and event feeds for data within ASOCS and on the Internet

Development of a new ASOCS SMS module offers:

- Custom alerting (email and text) for special events within the system
- Tracking events from start to finish
- Custom alerting when specific words are inputted into the system
- Custom checklist for routing tasks to individuals with additional alerting
- Ranking events for SMS priorities
- Additional reporting capabilities for SMS routines

- Custom web page for tenants to anonymously report events within ASOCS

TASK # 4:

Collect hazard reports, incident and accident reports and other safety related data and information under the Airport's SMS Manual or other applicable documentation within two months of AIP grant award or study start.

The Airport Operations Division uses a variety of existing data collection systems such as mandatory incident reports, the wildlife hazard tracking database, the FOD Database, Clean Sweep documentation and self-inspection program, which is mentioned in the SMS Manual. The Ramp Safety Program is a new safety enhancement program that is mentioned in the SMS Manual. The Ramp Safety Program was introduced to the SMS Working Group to obtain their approval of the program. Refer to Exhibit 1 for a FOD Form, Exhibit 2 a for Wildlife Form and Exhibit 3 for a Ramp Safety Inspection Form.

In fulfillment of task # 4, Airport Operations provided the data sources from ASOCS to ESIS Insurance to process into an SMS Dashboard, which is a performance measurement tool. The data sources used in the study were:

- Incident reports
- Wildlife hazards
- FOD
- Clean Sweep
- Self-Inspections on non-movement area
- Ramp Safety
- Hazmat
- Air tenant incidents
- Aircraft Emergency Alerts
- Headlights OTS
- FOD Risk Assessment

A number of data points from each report mentioned above were utilized to compile the dashboard for analysis. Many of these data sources require immediate action. An example would be using pyrotechnics to disperse wildlife from the airfield. Another example is FOD generation, which requires an individual to immediately remove FOD on the movement and non-movement areas. These are reflected in the ASOCS reports that were provided for the SMS Dashboard. ESIS conducted a sample comparison of December 2010 versus January 2011 to develop the Pareto charts for the dashboard. The goal of the SMS Dashboard is to identify trends that might lead to a specific area of concern and require further analysis to develop possible actions. This particular dashboard was designed to examine the occurrences based on location such as a runway, taxiway, ramp or gates in relation to how it would impact the airport operation.

A data collection report was developed to represent our efforts to date under task # 3, which includes:

- Collect hazard reports, incident and accident reports, and other safety related data/information under the Airport's SMS Manual
- Analyze the information collected through the reporting and/or data collection system or applicable processes
- Implement a safety reporting and/or data collection system or applicable processes in conformance with the Airport's SMS Manual

As such, a sampling of these reports were collected and collated. It can be expected that the list of documents where SMS data is derived can change over the years, where data sources are added and deleted, depending on their value to the SMS data analysis. In addition, data fields were standardized based on the analytical expectations of SMS data review. Finally, a sample “Dashboard” was created, using actual data, demonstrating a potential analytical approach to the data.

In terms of “implementing a safety reporting system,” the ASOCS will have an SMS Module developed into the system.

Data Sharing Issues

With stakeholder data, only a few reports were received from tenant companies, which were sanitized to protect their identity. The challenge was that most of the companies were concerned about data protection and Freedom of Information Act (FOIA) laws. Airline concerns are as follows:

- a. Incompatibles between an airport SMS and air carrier SMS,
- b. Lack of ownership of data in control of external sources, and
- c. Company data subject to FOIA laws at a public airport.

Most of the companies believe data sharing could result in an unintended lack of protection for employees by the companies, and potential non-compliance with regulatory issues that affect the companies’ reputation.

Most companies would require clarity in the following:

- a. Ensuring their documents and data are maintained as confidential documents, not subject to release to the public under the FOIA.
- b. Possession and control of the data acquired.
- c. Use of accident and incident data in tenant risk assessment exercises, and
- d. Use of stakeholder data, for creating and/or modifying, processes for all tenants at an airport.

TASK # 5:

Analyze the information collected through the reporting and/or data collection system along with the applicable processes within 5 months of AIP grant award or study start.

For the purpose of this study, we used existing data collection systems to fulfill the requirements of task # 5. ESIS developed an SMS Dashboard that was presented on March 31, 2011 to the SMS Working Group. Below is an explanation of the SMS Dashboard.

SMS DASHBOARD

How is any of the information currently being measured (trending, dashboard, etc.)? ATL analyzed data to be incorporated into a SMS Dashboard, which provided a learning forum of how the data can be used to develop strategies for trend analysis and performance metrics.

The SMS Dashboard will provide an overview of airport operations and a baseline on the type of occurrences, frequency and causality to develop corrective actions.

Recommendations

ATL will be working with ESIS, GCR Consulting (the ASOCS developer) and other Airport users to standardize the data forms and develop comprehensive SMS Dashboard programs to incorporate all elements of Part 139 and other data points. This SMS Dashboard program and refinement data process

will provide an efficient and effective trend analysis tool. Overall, this will enhance safety initiatives at ATL.

TASK # 6:

Conduct an internal audit/evaluation following the methods and procedures prescribed under the Safety Assurance component of the Airport's SMS Manual or applicable documentation within eight months of AIP grant award or study start.

The SMS Performance Assessment focused on the implementation of this study plan that exercises certain elements of the SMS program such as Safety Risk Management and Safety Assurance components. ATL used the ESIS Insurance assessment to complete task #6 with the FAA ADO and Risk Management to participate in the SMS Performance Assessment. ESIS developed an SMS Performance Assessment Tool based on the SMS NPRM requirements. Although ATL is in the early phases of SMS Implementation, it was hard to conduct a comprehensive assessment since several initiatives are still in development. Since the SMS Program is not in a full implementation yet, this assessment provided an overview of several elements that are under development. This SMS Performance Assessment provided a baseline of measures to be considered into the SMS Implementation Plan.

In the Safety Assurance section of the SMS Manual, the following revisions were applied to the following:

- Removing some redundancies in the ramp safety program
- Incorporating the Airside Incident Investigation procedures, the SMS Performance Assessment procedures, and the confidential reporting procedures

Refer to the SMS Performance Assessment Tool for more detailed information.

SRA SIXTH STEP: Risk Management

Risk Management is the process of taking the information from a Risk Assessment and applying management systems principles of integration and continuous improvement. From an integration standpoint, risk management verifies that controls are in place and effective by integrating them into the inspection process, tracking and accountability of safety issues, and management of change.

In addition, risk management is the process where continuous improvement results in further risk reductions and abatement based on incident analysis, developments in control technologies, etc. As a result, there are two further components of risk management: Control Verification and Ongoing Risk Reduction.

Control Verification

Control Verification includes evaluation of worksite conditions through the written records of inspection reports of hazards, employee reports of hazards, and incident/accident investigations. The Control Verification items on the organizational inspection checklists are intended to be targeted on the controls the safety committee feel may not be consistently implemented. It is intended that the controls on the checklists may change, and that if controls are not consistently in place, the committee will report these to the Business Leads and record their corrective actions to help improve the overall performance of the control implementation. Once controls are consistently reported at over 95%, that control can remain on the checklist, but additional high-risk controls should be added.

Risk reduction efforts should be measured periodically, to include:

- a. Implementation of elimination/substitution controls;
- b. The number of Risk Assessments performed; and
- c. Trending the number of controls in place/practiced versus not implemented.

Metrics are intended to help the organizations communicate the status of their safety and health responsibilities, goals and targets. In the long term, it is expected that the metrics will change every year, and become more progressively aligned with leading metrics, risk reduction targets, etc. For example, action plan status resulting from any category not achieving “Acceptable” (green) could be an additional metric (objective or target). The following are possible metrics:

- a. ID Risk Reduction Targets: Ensure targets have been established and documented in meeting minutes for either prioritized risk activities or hazard categories based on a risk assessment. Typically, this is based on the highest numbers on the "Prioritization" of the risk assessment.
- b. Concurrence on Targets: Leadership endorses the targets and communicates this endorsement to the general workforce.
- c. Target (Objective) Status: Targets are those identified by the risk assessment for risk reduction or and/or injury and illness statistics, or other safety data. This data is typically monitored as part of committee minutes.
- d. Critical Control Verification Rate: Safety is notified and performs risk assessments for changes in facilities, process, tools and equipment. Safe work procedures are developed prior to operation.

Leading metrics are developed to measure factors of critical safety programs, which identify hazards and fixes. Metrics are collected to measure the closure rate of the hazard fixes and controls. All critical programs are included in each of the above metrics, such as employee reports of hazards, inspections, investigations, hazard analysis, special surveys, etc. In Figure 1 below, the flow chart depicts how risk control and risk management relate to each other in both the SMS process and Part 139 mandates.

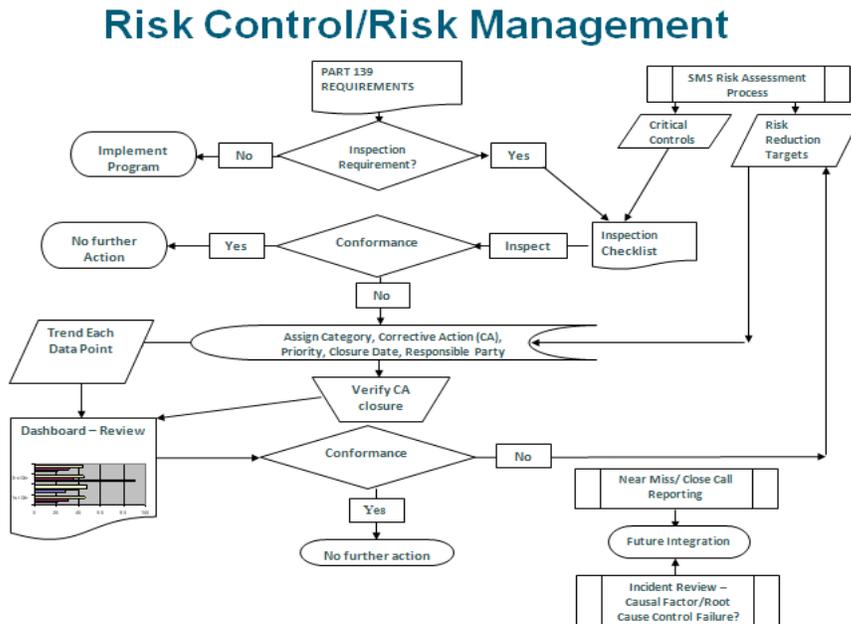


Figure 1: Risk Control / Risk Management

Risk Reduction Efforts

Although the absence of safety-related events (accidents and incidents) does not necessarily indicate a “safe” operation, some operations are considered “safer” than others are. Risk reduction is an ongoing and continuous process of implementing more aggressive hierarchies of controls, in order to reduce both severity and likelihood. As an organization undergoes changes, they continue to add defenses. However, lessons learned from incident analysis yield additional opportunities to refine and abate risk controls and risks, respectively. Figure 2 outlines the sixth step of Risk Management in the Preliminary Hazard Analysis Tool.

Step 6 Risk Management and Risk Reduction					
Critical Control (Y if Residual Severity is Catastrophic or Serious, or if Residual Risk is High)	Describe the Critical Control. (Add to inspection, testing or observation)	Critical Control Owner (by Title)	Control Category (Based on Corrective Action)	Hierarchy/Defense in Depth Met If No, then add additional controls via CAs is Step 5	Risk Reduction Target

Residual Severity	Residual Probability	Residual Risk Total	Critical Control	Describe the Critical Control. (add to inspection, testing or observation)	Critical Control Owner (by Title)	If Residual Severity is S = Serious or C=Catastrophic If Residual Risk is High Then Control is “Critical” (Other Controls may be Critical, based on Assessor’s judgment)
M	L	M	N	Enclosure of electrical junctions	Maintenance	
C	L	H	Y	Training	Security	
S	L	H	Y	Flight Path. Clearance areas	Tower	

Figure 2: Preliminary Hazard Analysis. Require “Failure Rate Metrics” from Critical Control Owners periodically. Validate through inspections and observations. Hold Owners accountable for maintenance & long-term controls.

These hazards must have critical controls implemented, based on the team performing the risk assessment. Residual risks remain that have controls, yet the severity of that risk is still significant and requires a critical control owner.

For these reasons, the sixth step of the risk assessment process -risk management was added to the SMS Manual.

CHALLENGES

ATL identified the following challenges in the SMS Part 139 Implementation Pilot Study:

- Safety Risk Management: FAA guidance material does not address which entity (airport, air carrier, service provider, etc.) is responsible for accepting any known risks for shared responsibilities/areas. In addition, FAA guidance material should address safety risk assessments regarding airport construction projects.
- Develop a documented process/protocol for the Airport and its business partners ensuring acceptance and harmonization of the decision making process and defining responsibilities to evaluate, accept and mitigate risks. These items will need to be addressed in each operator's particular SMS (i.e. MOUs MOAs, Lease Agreements).
- The time required to conduct an SRM Panel can be substantial depending on the nature of the scenario. After three risk assessments, none were completed within a six-hour, one-day session. Most panel members agreed two four-hour sessions would be more effective to complete an external risk assessment.
- Safety Assurance: The FAA should provide an example of an SMS assessment table that airports could use when conducting an assessment. The ACRP SMS Guidebook and ICAO provide examples of SMS assessment tables.
- The FAA should provide resources to assist airports in creating a training curriculum. ICAO has provided a ten-module presentation and handouts on the ICAO website for the industry to use. This would provide a uniform and consistent set of standards for initial and recurrent training that would meet the goals and expectations of SMS. More guidance documents on SMS training material are desired.
- The FAA should provide guidance on how the airport, air carrier and FAA Air Traffic SMS programs would interface. There are concerns related to responsibilities, auditing processes and interests regarding ramp/gate areas that may be exclusively leased by an air carrier or other entity. The FAA should also provide guidance on how these issues should be addressed with regards to notification and data sharing requirements.

BENEFITS OF SMS PILOT STUDIES

ATL identified the following benefits in the SMS Part 139 Implementation Pilot Study:

- The use of SMS at ATL can contribute by increasing the likelihood that airport operators will detect and correct safety problems before those problems result in an aircraft incident or accident.
- The SMS will allow ATL to realistically and efficiently balance safety and operations. Perhaps most importantly, ATL will be at the forefront of the FAA mandated SMS requirement for all airports in the future.
- The Safety Risk Assessment process is helping to effectively evaluate, hazards with construction projects and changes on the airfield.
- Establishing an SMS Working Group with tenant involvement has provided cohesive business relationships in the development and refinement of the ATL SMS Program. The SMS Working Group will become the Safety Committee, as directed in the SMS Program.
- The ASOCS database system is very beneficial for Part 139 reporting and being able to fulfill SMS reporting requirements. The SMS Dashboard will supplement the ASOCS data with trend analysis and tracking capability.
- This Part 139 Implementation Study provided ATL a robust SMS program with more resources and tools, a refined SMS Manual, and an informed staff on the Safety Risk Management and Safety Assurance components of SMS. Overall, this will enhance safety initiatives at ATL.
- As a result of partnering with ESIS Insurance and the Air Traffic Organization, the following have been successfully developed: a robust Safety Risk Assessment process, a conceptual SMS Dashboard/SMS Module to be incorporated into the ASOCS system for SMS reporting, a through SMS Manual and Implementation Plan, and an effective SMS Performance Assessment Tool

In conclusion, ATL would like to thank the FAA for allowing the airport community to participate in the SMS Part 139 Implementation Pilot Study, and contribute to the Part 139 SMS rulemaking. Overall, these actions will enhance our safety initiatives at Hartsfield-Jackson Atlanta International Airport.