

**Charter Communications**  
**Flight Department**  
**Safety Management System**

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## RECORD OF AMENDMENTS

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## LIST OF EFFECTIVE PAGES

Page No.	Amendment No. Effective Date	Page No.	Amendment No. Effective Date
1	Original, [Date]		
2	Original, [Date]		
3	Original, [Date]		
4	Original, [Date]		
5	Original, [Date]		
6	Original, [Date]		
7	Original, [Date]		
8	Original, [Date]		
9	Original, [Date]		
10	Original, [Date]		
11	Original, [Date]		
12	Original, [Date]		
13	Original, [Date]		
14	Original, [Date]		
15	Original, [Date]		
16	Original, [Date]		
17	Original, [Date]		

# **Charter Communications Flight Department Safety Management System**

## **1. SAFETY POLICY AND OBJECTIVES**

### **1.1 Safety Policy and Objectives**

The safety policy of the flight department is to prevent accidents and injuries through proper use and participation of this Safety Management System (“SMS”) program, proper planning of tasks, diligent execution of tasks, constant vigilance, a professional attitude, and an open and just culture in the work place. We will actively seek out hazards with their associated risks, as well as latent defects within our rules and processes, that threaten the safety and well-being of our personnel and travelers, aircraft and property, and flight and maintenance operations. These hazards with associated risks and latent defects will be analyzed and will then be avoided, eliminated, or mitigated to as low a level as reasonably practicable. The mitigation actions taken against identified hazards and defects will be tracked and tested for effectiveness.

For safety performance objectives, the flight department will:

- a) Produce a requisite number and quality of Safety Reports reflective of the flight department’s sincere commitment to the SMS process.
- b) Hold the requisite number of SMS Safety Committee meetings as outlined in this SMS.
- c) Hold the requisite number of internal and external safety audits as outlined in this SMS.
- d) Conduct the requisite training for the safety manager, members of the safety committee, and all members of the flight department.
- e) Have measurable improvement in safety in successive years through fewer and less severe reportable events and close-calls.

### **1.2 Management Commitment and Safety Accountabilities**

Mr. Robert Quicksilver, in addition to all other functions, has ultimate responsibility and accountability for providing the resources and working conditions for the safe operation of company aircraft and to actively support the safety management system. Mr. Quicksilver, acknowledges this commitment by the cover letter enclosed and signature contained herein.

Mr. Gary Ashley, Chief Pilot ensures that flights are conducted in compliance with all applicable safety regulations, makes the final decision for any recommendations from our SMS Safety Committee, and is responsible for approving any exceptions to our operations manual following a risk assessment. The flight department manager will also review the safety policy periodically to ensure it remains relevant and appropriate to our operations. Mr. Dave Thompson, Director of Maintenance ensures that all maintenance and compliance issues with the FAA are carried out in a timely and compliant manner.

The success of this SMS depends on the safety consciousness and co-operation of everyone in the company. All flight department personnel are responsible for following our flight operations manual, following all safety rules, remaining vigilant to hazards, and proactively participating in the SMS.

Except for intentional bad acts, situations that clearly exhibit a reckless disregard for safety, or prior poor performance record, no disciplinary action will be taken against personnel for an act or omission promptly reported within the SMS. Aviation personnel who submit a safety report within the SMS should consider to likewise submit a report to the Aviation Safety Reporting Program as per FAR 91.25. Any inappropriate act or omission by company personnel discovered by management not reported within the SMS are subject to normal company procedures for discipline.

### 1.3 Appointment of Key Safety Personnel

- a. **Safety Manager.** Mr. Joel Leach has been assigned as the Safety Manager. While performing the role as Safety Manager, he will report directly to the flight department manager on issues and procedures related to the SMS. The Safety Officer will receive annual safety related training to enhance their performance in this position. In addition to his or her normal duties, the flight department's Safety Manager is responsible for:
  - i. Implementation and maintenance of the SMS;
  - ii. Providing risk assessments as required;
  - iii. Accepting written or verbal Safety Reports;
  - iv. Providing the initial assessment of submitted Safety Reports as to urgency for submission to the SMS Safety Committee;
  - v. Transferring the information from a Safety Report to a Safety Committee Evaluation, Recommendation, and Tracking form, and then destroy the original Safety Report;
  - vi. Convene and chair the SMS Safety Committee that will meet bi-annually;
  - vii. Verify that the management-approved committee recommendations are being implemented;
  - viii. Track the recommendations for effectiveness;
  - ix. Distributing pertinent safety information to other flight department personnel; and
  - x. Undertake any other safety tasks as required.
- b. **SMS Safety Committee.** The flight department has a SMS Safety Committee, and at a minimum includes the Safety Manager, a pilot from flight operations, and a mechanic from maintenance operations. More personnel can be named to the committee at the discretion of the flight department manager. The members of the Committee will receive safety-related training to enhance their performance in this position. The Committee will meet as often as necessary, but at a minimum every six (6) months. The SMS Safety Committee is responsible for:
  - i. Processing Safety Committee Evaluation, Recommendation, and Tracking form submissions received from the Safety Manager (i.e. the original Safety Report has been purged), by:
    - a. Analyzing the report for a root cause(s);
    - b. Recommending corrective actions to eliminate, avoid, or mitigate the underlying hazard or hazards with its associated risks, or identified latent defects within any of our rules or processes;
    - c. Perform a cost/benefit analysis as necessary of their recommendations.
  - ii. Reviewing previous risk assessments, operations manual exceptions, and Flight Risk Assessment Tool forms for appropriateness;
  - iii. Completion and updating of Safety Risk Profile, the most current completed copy to be kept in the Safety Information Must Read File;
  - iv. Brainstorming for any additional safety recommendations;
  - v. Reviewing the appropriateness of recommendations from any safety audits;
  - vi. Track previous corrective actions for effectiveness and trends;
  - vii. Regularly monitoring the effectiveness of the SMS; and
  - viii. Undertake any other safety actions as required.

### 1.4 Coordination of Emergency Response Plans

The flight department has an emergency response plan that provides for the orderly and efficient transition from normal to emergency operations. Prior to returning to normal operations, the Safety Committee will investigate the cause for the emergency operations, review the findings, and recommend corrective actions for management's consideration. The flight department will coordinate as appropriate with the emergency response plans of those organizations it must interface with during the emergency.

## **1.5 SMS Documentation**

This SMS Manual documents the policies, procedures, and processes of the flight department's safety management system. Contained within the Appendix to this Manual, are the forms for:

- a. Management Commitment Statement
- b. Safety Report
- c. Safety Committee Evaluation, Recommendation, and Tracking Form
- d. Safety Risk Profile
- e. Flight Risk Assessment Tool
- f. Corrective Action Tracking
- g. Safety Information Must Read File is located in Hangar Office on bulletin board

## **2. SAFETY RISK MANAGEMENT**

### **2.1 Hazard Identification**

The process by which any hazards with their associated risks, as well as latent defects within our rules and processes, will be identified within our flight, maintenance, and ground operations is as follows.

- a. All flight department personnel will complete a Safety Report form and submit it to the Safety Manager for processing through the SMS, for any of the following reactive, proactive, and predictive situations:
  - i. They experience an event themselves, or observe another employee, that involves:
    - a) Any injury to anyone, or close-call of an injury, other than a simple cut or bump;
    - b) Any aircraft or equipment inappropriately coming into contact with something else, or any such close-call;
    - c) A misapplication or omission of any law, FAR, or company rule or process;
    - d) Required them to take evasive action or make a correction action;
    - e) If the person files an Aviation Safety Report Program submission as per FAR 61.25;
    - f) In the judgment of the individual, any event that should be reported.
  - ii. They identify a hazard or risk to our operations;
  - iii. They speculate or have discovered a flaw in any of our rules or processes meant to prevent injury or harm to persons or property;
  - iv. They envision a situation in our operations that could result in injury or harm to persons or property;
  - v. They have an idea, or have heard or seen something in use elsewhere, to help prevent injury or harm to persons or property;
  - vi. They have an idea to make any process more effective or efficient;
  - vii. In the judgment of the individual, anything they feel should be reported.
- b. The SMS Safety Committee in performing its function may generate a Safety Report.
- c. Whenever any leg of a trip as schedule would be conducted in an environment outside our normal operations as described in the Safety Risk Profile, the pilot-in-command will complete the Flight Risk Assessment Tool to evaluate the risks associated with that flight. If the risks score total is higher than 15, the flight must be assessed by the flight department manager, or his designee, prior to departure. This completed form will be kept to be reviewed for appropriateness by the SMS Safety Committee at their next regularly schedule meeting, after which it will be destroyed.
- d. Any recommendations from the internal audit described in paragraph 3.1b will be submitted to the SMS Safety Committee for evaluation.
- e. Any recommendations from the external audit described in paragraph 3.1c will be submitted to the SMS Safety Committee for evaluation.

## **2.2 Safety Risk Assessment and Mitigation**

The process by which any identified hazards, risks, and latent defects are analyzed, assessed and controlled within our flight, maintenance, and ground operations is as follows:

- a. The Safety Manager will initially assess the significance of any Safety Report in determining whether it should be reviewed by the SMS Safety Committee immediately, or at the next regularly scheduled meeting.
- b. All risk assessments performed by the flight department will be reviewed by the SMS Safety Committee for appropriateness.
- c. The SMS Safety Committee will perform its function as described in paragraph 1.3b above.
- d. The Chief Pilot will evaluate recommendations received from the SMS Safety Committee and can either accept, modify, or decline them as necessary. If the manager accepts the recommendation, he/she will note as such on the form and will assign the task to complete the recommendation to the appropriate individual and make the necessary resources available. Should the manager choose to modify or decline a recommendation, he/she must state the reasons for such action on the form.
- e. All Safety Committee Evaluation, Recommendation, and Tracking forms are returned to the Committee for tracking purposes.
- f. The Safety Manager will post in the Safety Information Must Read File all corrective actions implemented, state the issues involved, and the reason for such corrective actions.
- g. The Chief Pilot will announce or email to all flight department personnel of the corrective action and direct them to read the posting in the Safety Information Must Read File. All flight department personnel are required to read and follow the posting.

## **3. SAFETY ASSURANCE**

### **3.1 Safety Performance Monitoring and Measurement**

The process by which the flight department verifies its safety performance, by meeting the safety performance objectives within paragraph 1.1 above, and the effectiveness of our safety risks controls, is as follows:

- a. The Safety Officer will compile an annual report for the flight department manager that evaluates our SMS process, the reports generated, and actions taken, in determining whether the flight department is meeting our safety performance targets. After being reviewed by the flight department manager, this report will be posted to the Safety Information Must Read File for all flight department personnel to review.
- b. On an annual basis, the Chief Pilot will organize and have an internal audit performed by company employees to evaluate our flight, maintenance, and ground operations in meeting our safety performance targets.
- c. The Chief Pilot will arrange for a safety audit to be performed by an outside safety consultant, on an as needed basis but not less than every three (3) years. This external audit is to also review our SMS process, the reports generated, and actions taken in determining whether the flight department is meeting our safety performance targets. The auditor may also make any safety recommendations for our operations.

### **3.2 The Management of Change**

The process by which the flight department identifies changes which may affect our processes and services; to ensure our safety performance before implementing changes; and to eliminate or modify safety risk controls that are no longer needed or effective due to changes in the operational environment, is as follows:

- a. Whenever a change or prospective change should occur in our flight, maintenance, or ground operations, the SMS Safety Committee will determine whether incorporating such change conforms to our existing flight department processes and services, or rather they should be modified or even reduced because of the change to sustain our level of safety performance, If modification or reduction of our



processes are justified, the Committee will make recommendations to the flight department chief pilot for consideration and implementation, taking into consideration of our operations manual standards, limitations, and processes, the SOP's, staffing, facilities, and budgeting. Some examples of change, but not limited to this list, are:

- i. The addition or elimination of an aircraft;  
Or change of aircraft type;
  - ii. Permanent or temporary addition or elimination of personnel;
  - iii. Addition or elimination of common trip destinations or area of operation;
  - iv. Change of vendor for training, fueling, maintenance, etc.;
  - v. Moving or modification of hangar and office facilities.
- b. The SMS Safety Committee will update the Safety Risk Profile as required.

### **3.3 Compliance Monitoring**

The process by which the flight department maintains compliance with changes or modifications in applicable regulations, standards, approvals and exemptions is through our membership with the National Business Aviation Association ("NBAA") with their newsletters and bulletins, through our updates subscription with the OEM of our aircraft, updates as part of our recurrent aircraft and maintenance training with our training vendor, and through subscriptions to trade publications (Business and Commercial Aviation, Pro Pilot, Aviation International News).

### **3.4 Continuous Improvement of the SMS**

The process by which the flight department identifies any causes of sub-standard performance of the SMS, determines the implications of sub-standard performance of the SMS in operations, and eliminates or mitigates such causes is by pertinent Safety Reports submitted within the SMS, by the SMS Safety Committee as per paragraph 1.3b.vii, and by the responsibilities listed in paragraph 3.1 including the annual review by the Safety Officer and the internal and external SMS audits.

## **4. SAFETY PROMOTION & COMMUNICATION**

### **4.1 Training and Education**

The flight department ensures that personnel are trained and competent to perform SMS duties through SMS initial training upon hiring, biannual SMS recurrent training, and by reviewing the Safety Officer's annual SMS report as per paragraph 3.1a. The scope of the SMS training is scaled for each individual to match the appropriate level of their involvement and responsibilities within the SMS.

### **4.2 Safety Communication**

The means by which the flight department ensures that all personnel are fully aware of the SMS, conveys safety critical information, and explains why particular safety actions are taken and why safety procedures are introduced or changed is through this written SMS document itself, their SMS training required in paragraph 4.1, and their requirement to regularly read the Safety Information Must Read File.

## **Appendix of SMS Forms**

### **Management Commitment Statement**

As Senior Executive Vice-President over the flight department, I acknowledge my responsibilities for the success of the Charter Communication flight department Safety Management System.

\_\_\_\_\_  
Signature

Robert Quicksilver Senior Executive Vice-President  
Printed Name Title

## Safety Report Form

Describe the event or issue you wish to report. Please provide as much detail as possible.	Date	Time
	Location	
Name		
Optional		

NOTE: Please submit this report to the Safety Officer in a timely manner. After this report is submitted to the SMS Safety Committee for evaluation and tracking, it will be destroyed.

## Safety Committee Evaluation, Recommendation, and Tracking Form

Summary of event or safety issue reported.		Date _____
		Issue Number _____
Summary of Analyses		
Name _____		Date _____
Proposed Remedial Action		
Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> If rejected explain reason and proposed alternative action.		
Flight Department Manager _____		Date _____
Remedial Action Implemented		Date _____
Post Implementation Review conducted by _____ Date _____		

## **Safety Risk Profile**

A Safety-Risk Profile is an overview of the safety-risks that are generally experienced by the normal operations of the flight department. It describes what is considered the normal or routine flight operations and its associated safety hazards and risks. A completed profile will highlight and explain the areas of highest risk, justifying the need to effectively manage the risks.

The Safety-risk Profile contains the following information.

### **A description of normal operations:**

1. The company operates a Hawker 800 XP aircraft and Gulfstream 300 aircraft
2. Each Aircraft is flown approximately 400 hours per year.
3. The Flight department consists of a flying Chief Pilot, Four Captain Rated Line pilots, A non flying dedicated director of maintenance, A non flying lead maintenance technician and a safety trained Flight Attendant on the Gulfstream. Pilots are all ATP rated with extensive experience in Jet Operations, The Director of Maintenance is a Hawker trained and highly experienced technician. The lead technician is a highly experienced Gulfstream trained maintenance technician and the flight Attendant attends to the well being, meals and safety of the passengers and cabin on the Gulfstream aircraft.
4. Hawker usually flies with an average of four passengers and on occasion up to eight passengers and the Gulfstream with four passengers and on occasion up to thirteen passengers.
5. The Hawker aircraft operates primarily USA domestically and the Gulfstream operates worldwide with an emphasis on USA, Europe and the Caribbean.
6. All operations are conducted under IFR and there is an Operations Manual in place addressing normal operations. Duty times, protocols and policies.
7. The Hawker aircraft is serviced primarily at Jet Aviation (KCPS) Cahokia, Illinois and the Gulfstream at General Dynamics,(BAF) Westfield, Mass. Both aircraft are maintained according to the standards and policies of Hawker Beechcraft and Gulfstream Aircraft Corporation.

### **A description of the significant hazards**

The primary hazard for the flight department is weekend operations with high density IFR traffic mixing with VFR light aircraft in and around the New York area.

### **A description of the mitigation**

This issued is addressed in the Operations Policies to mitigate the risk by sterile cockpit below 10,000 feet, All FMS completed before descent below 10,000, resolution compliance with all TA and RA, One pilot's vigilance searching for traffic outside the cockpit at all times in the local airspace below 10,000. Pilots to receive prior training on the Runway 34 Sound Visual approach and Westchester 3 Departure procedures.

## Safety Risk Profile Form

Date form completed: 1 July 2012

1. The company operates an owned Hawker 800 XP aircraft and a leased Gulfstream 300 aircraft
2. Each Aircraft is flown approximately 400 hours per year
3. The Flight department consists of a flying Chief Pilot, Four Captain Rated Line pilots, A non-flying dedicated director of maintenance (KSTL), a lead maintenance technician (KHPN) and a safety trained Flight Attendant or Contract Flight Attendant on the Gulfstream 300. Pilots are all ATP rated with extensive experience in Jet Operations, The Director of Maintenance is a Hawker trained and highly experienced technician and the Flight Attendant attends to the well being, meals and safety of the passengers and cabin.
4. The Hawker 800 XP usually flies with an average of four passengers and the Gulfstream 300 with four passengers and on occasion up to thirteen passengers;
5. The Hawker aircraft operates USA domestically and the Gulfstream operated worldwide with an emphasis on Europe and the Caribbean.
6. All operations are conducted under IFR and there is an Operations Manual in place addressing normal operations. Duty times, protocols and policies.
7. The Hawker aircraft is serviced primarily at Jet Aviation Cahokia, Illinois and the Gulfstream at General Dynamics, Westfield, Mass. Both aircraft are maintained according the standards and policies of Hawker Beechcraft and Gulfstream Aircraft Corporation.

### Description of Significant Hazards to Normal Operations:

The primary hazard for the flight department is:

The primary hazard for the flight department is weekend operations with high density IFR traffic mixing with VFR light aircraft in and around the New York area.

This issued is addressed in the Operations Policies to mitigate the risk by sterile cockpit below 10,000 feet, All FMS completed before descent below 10,000, resolution compliance with all TA and RA, One pilot's vigilance searching for traffic outside the cockpit at all times. Prior training on the Runway 34 Sound Visual approach and Westchester 3 Departure procedures.

### Description of Mitigation:

The issue of complex operating environments in high density Metropolitan areas

The employment of highly experienced Hawker and Gulfstream pilots with worldwide experience and semi-annual currency in each respective aircraft.

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**NOTE:** The most current completed Safety Risk Profile Form will be keep on file in the Safety Information Must Read File.



Flight Risk Assessment Tool			
Date: _____		Departure: _____	
Release/Trip #: _____		Destination: _____	
Tail #: _____		Risk Value	Flight Value
<b>Pilot Qualifications and Experience</b>			
1	Captain with less than 200 hours in type	5	
2	First Officer with less than 200 hours in type	5	
3	Single Pilot Flight	5	
4	Captain with less than 100 hours last 90 days	3	
5	First Officer with less than 100 hours last 90 days	3	
6	Duty day greater than 12 hours	4	
7	Flight time (Greater than 8 hours in the duty day)	4	
8	Crew Rest (Less than 10 hours prior to the duty day)	5	
<b>Total Factor Score - Section 1</b>			
<b>Operating Environment</b>			
9	VOR/GPS/LOC/ADF (Best approach available w/o vertical guidance)	3	
10	Circling approach (best available approach)	4	
11	No published approaches	4	
12	Mountainous airport	5	
13	Control tower not operational at ETA or ETD	3	
14	Uncontrolled airport	5	
15	Alternate airport not selected	4	
16	Elevation of primary airport greater than 5000 ft. MSL)	3	
17	Wet runway	3	
18	Contaminated runway	3	
19	Winter operation	3	
20	Twilight operation	2	
21	Night operation	5	
22	Stopping distance greater than 80% of available runway	5	
23	Repositioning flight (no passengers or cargo)	5	
24	Pop up trip (Less than 4 hours crew notice)	3	
25	International operation	2	
26	No weather reporting at destination	5	
27	Thunderstorms at departure and/or destination	4	
28	Severe turbulence	5	
29	Ceiling & visibility at destination less than 500 ft. / 2 sm	3	
30	Heavy rain at departure and/or destination	5	
31	Frozen precipitation at departure and/or destination	3	
32	Icing (moderate-severe)	5	
33	Surface winds greater than 30 knots	4	
34	Crosswinds greater than 15 knots	4	
35	Runway braking action less than good	5	
<b>Total Factor Score - Section 2</b>			
<b>Equipment</b>			
36	Special Flight Permit Operation (ferry permit)	3	
37	MEL / CDL Items (items related to safety of flight)	2	
38	Special flight limitations based on AFM equipment limitations	2	
<b>Total Factor Score - Section 3</b>			
<b>TOTALS</b>			

**NOTE: The flight department manager, or his designee, must assess and approve any flight risk value greater than a score of 15.**

Corrective Action Tracking Form

Issue Description	Issue Number	Details	Initial Risk Rating	Risk Control Strategy	Implementation Date	Review Date	Assessment of Effectiveness