

**CONTRACTOR FLYING ORGANIZATION EXPOSITION (CFOE)**

Approval No:

Trading Name:

Business Mailing Address:

(AM(MF))

Telephone Number:

Email Address:

CFOE Reference:

CFOE Version:

Issue Date:

Review Date:

**This Page Should be Deleted from the CFOE Submitted to the MAA**

**NOTES**

1. All material contained within this document is for guidance purposes only. It sets out a template that the CFAOS Organizations may follow in order to define their Organization and the procedures used for the operation of UK Military Registered Air Systems. The content should be expanded as required to reflect the CFAOS procedures and identify who is undertaking the activity.

2. Where the CFAOS Organization wishes to conduct an activity that is not in compliance with the MAA Regulatory Publications (MRP) then an Alternative Acceptable Means of Compliance (AAMC), waiver, or exemption or must be applied for, and approved by the MAA, in accordance with MAA 03. Failure to do so will delay an initial approval or invalidate an existing approval. Where an AAMC, waiver or exemption has been granted, this must be clearly articulated and referenced in the CFOE.

3. A CFAOS Organization which is responsible for multiple Air System types and marks may submit a single CFOE, providing it details all the Air Systems being managed and clearly defines how/what activity is conducted for each type/mark.

4. When determining the content of the CFOE the Accountable Manager (Military Flying) (AM(MF)) should consider the requirement of the Acceptable Means of Compliance (AMC) and Guidance Material (GM) associated with the relevant MRP Regulatory Articles (RAs) and use the principle of “Who, What, Where, and How.” This will ensure that for each paragraph heading the AM(MF) articulates:

a. What activates are being done.

b. Who is doing them.

c. What they are being carried out in accordance with, this may be MRP RAs or local orders.

5. Bulleted lists, rather than extensive paragraphs, describing the activity are acceptable. Any references within the CFOE to other documents should be direct and not through other documents or Expositions.

6. After completing the CFOE the Organization should complete a list / statement of all applicable RAs; this should then be included as an appendix in Part 7 of the CFOE.

7. MAA CFAOS approval staff will review the CFOE and supporting documentation and conduct an on-site visit, in order to confirm that the CFAOS Organization is in compliance with the MRP. This process will be required before an initial approval is issued and may be required for a change to an existing approval.

8. Any queries with this document should be addressed to:

**DSA-MAA-OpAssure-CFAOS-Group@mod.gov.uk**

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**Amendment Record**

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# Distribution List

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The document should include a distribution list to ensure proper distribution of the exposition and to demonstrate to the MAA that all personnel involved in the CFAOS Organization have access to the relevant information. This does not mean that all personnel must be in receipt of an exposition but that a reasonable number of expositions are distributed within the Organization(s) so that all personnel have quick and easy access to it.

Where documents are held in electronic format, centrally, this should be expanded here. Abbreviations Used

List all the abbreviations used in the CFOE

|  |  |
| --- | --- |
| AAMC |  Alternative Acceptable Means of Compliance |
| ALARP | As Low as Reasonably Practicable |
| AM(MF) | Accountable Manager (Military Flying)  |
| AMC | Acceptable Means of Compliance |
| ASMS | Air Safety Management System |
|  |  |
| CAMO | Continuing Airworthiness Management Organisation |
| CFAOS | Contractor Flying Approved Organization Scheme |
| CFOE | Contractor Flying Organization Exposition  |
|  |  |
| DAE  | Defence Air Environment |
| DAOS  | Design Approval Organization Scheme  |
|  |  |
| GM | Guidance Material |
|  |  |
| LRQA | Lloyds Register Quality Assessment  |
|  |  |
| MAA | Military Aviation Authority  |
| MAOS | Maintenance Approval Organization Scheme  |
| MRP | MAA Regulatory Publication |
|  |  |
| QM | Quality Manager  |
|  |  |
| RA | Regulatory Article  |
| RtL | Risks to Life |
|  |  |
| SM | Safety Manager  |
| SQEP | Suitably Qualified and Experienced |

# PART 1 MANAGEMENT

Reference:

RA 1028(2): Accountable Manager (Military Flying)

### 1.0 Corporate Commitment by the Accountable Manager (Military Flying)

The AM(MF) confirms that this CFOE and any associated manuals define the organizations compliance with the MRP.

[ENTER ORGANIZATIONS NAME HERE]

**CONTRACTOR FLYING ORGANIZATION EXPOSITION**

This Exposition and any associated referenced manuals define the Organization and procedures upon which the Contractor Flying Approved Organization Scheme (CFAOS) approval is based, as required by MAA Regulatory Publication (MRP) RA 1028(4) and its associated Acceptable Means of Compliance (AMC) and Guidance Material (GM).

These procedures are approved by the undersigned and must be complied with, as applicable, in order to ensure that the CFAOS Organization actively manages air safety via an effective Air Safety Management System (ASMS) in order to mitigate Risks to Life (RtL) to As Low as Reasonably Practicable (ALARP) and Tolerable.

I accept that these procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

I understand that the MAA will approve this Organization whilst the MAA is satisfied that the procedures are being followed and the work standard is maintained. I understand that the MAA reserves the right to suspend, vary or revoke the CFAOS approval of the Organization if the MAA has evidence that procedures are not followed, and the standards not upheld.

[The Accountable Manager (Military Flying) may also wish to include their own personal statement of commitment to that shown above]

Signed ……………………….

Dated………………………….

Accountable Manager (Military Flying) ……………………. [Quote position].

For and on behalf of ………………………………………… [Quote Organisations name]

Note: (Not for inclusion in the Exposition)

1. Whenever the AM(MF) is changed, the new AM(MF) should sign the CFOE statement at the earliest opportunity as part of the continuing approval of the CFAOS. Failure to carry out this action within a time period not exceeding 30 days from changeover invalidates the CFAOS approval.

### 1.1 General Information

Reference:

RA 1028: Contractor Flying Approved Organization Scheme

RA 1005: Contracting with Competent Organizations

RA 1160: The Defence Air Environment Operating Framework

**1.1.1 Description of the Organization**

[Organization’s name \*\*\*\*] is structured under the management of [insert name of Accountable Manager.] For the complete management structure refer to the organisation’s management chart in paragraph 1.1.2.

[Insert here: The scope of the MAA regulated flying organization, including: types and marks of Air Systems; categories of flying; and details of routine operating bases and requirements to undertake temporary detached operations is to be included here.]

**1.1.2 Defence Air Environment Operating Categories**

This paragraph should include a list of the assigned DAE operating category / categories.

**1.1.3 Operating Environments**

Enter a statement with regard to the operating environments expected to be included in the task, such as: embarked; night-vision/EO; formation; unprepared strips; low level; and/or, ordnance, munitions, and explosives.

**1.1.4 Organization Chart**

The chart should provide a comprehensive understanding of the whole of a company’s management structure and should clearly show the independence of the quality system and airworthiness review process.]

**1.1.5 Relationship with Other Organizations**

Insert details of those organizations involved in the delivery of Contractor Flying, including Service organizations, contractors, and sub-contractors. Where applicable, include a statement regarding their suitability. Where necessary for clarity, include a diagram/chart showing boundaries.

‘CFAOS Organizations name’ contracts the following tasks:

‘CFAOS Organizations name’ subcontracts the following tasks:

‘CFAOS Organizations name’ has Service Level Agreements with:

‘CFAOS Organizations name’ has a Memorandum of Understanding with:

**1.1.6 Organizational Scale**

This paragraph should include a description of the Organization scale, including: numbers of aircrew, supernumerary crew and other manpower resource associated with the task; numbers of Air Systems; and, expected flying rate.

### 1.2 Management Personnel

Reference:

RA 1002: Airworthiness Competent Persons

Amend to reflect the current management staff and contracted relationships as appropriate.

**1.2.1 Accountable Manager (Military Flying)**

References:

RA 1028(2): Accountable Manager (Military Flying)

The duties and responsibilities associated with this post are held by [Enter Name and Title of AM(MF)].

**1.2.1.1 Accountable Manager (Military Flying) Roles and Responsibilities**

The roles and responsibilities of the AM(MF) should be outlined here.

If the AM(MF) is not able to fulfil any of their responsibilities or there are caveats to those responsibilities then they should be stipulated here, with reference to any associated MAA AAMC, waiver, or exemption and /or higher authority acceptance.

**1.2.1.2 Accountable Manager (Military Flying) Qualifications and Experience**

All relevant qualifications and experience for this post should be listed here.

**1.2.2 Approved Post Holder Holders for Contractor Flying Approval Scheme**

Reference:

RA 1028(2): Accountable Manger (Military Flying)

An AM(MF) should appoint and approve post-holders to support them in providing specialist support in delivering their responsibilities.

The duties and responsibilities associated with the post of [\*\*\*\*\*] are currently assumed by [Enter Name and Title of Post Holder]. This paragraph should list the approved post holders.

1. Flight Operations[[1]](#footnote-2).
2. Crew Training[[2]](#footnote-3).
3. Ground Operations.
4. Any other areas that may impact the delivery of safe aviation operations, such as Design or Production.

**1.2.2.1 Approved Post Holder Holders for CFAOS Roles and Responsibilities**

A full description of the functions and responsibilities of each post-holder listed at para 1.2.2 should be outlined here and include names, and any deputizing responsibilities and arrangements.

**1.2.2.2 Approved Post Holder Holders for CFAOS Qualifications and Experience**

The competencies, qualifications and skill sets required for the post-holders listed at para 1.2.2 should be listed here.

**1.2.3 Military Continuing Airworthiness Management**

Reference:

RA 1016(2): Establishment of a Military Continuing Airworthiness Management Organization

The duties and responsibilities associated with this post are held by [Enter Name and Title].

**1.2.4 Quality Manager**

Reference: CFAOS Organization Quality Management Policy

The duties and responsibilities associated with this post are currently assumed by the AM(MF) Manager (small organizations only).

 Or

The duties and responsibilities associated with this post are currently assumed by [Enter Name of Individual], who has been assessed as being Suitably Qualified and Experienced (SQEP), in support of the AM(MF).

**1.2.4.1 Quality Manager Roles and Responsibilities**

Details of the Quality Manager (QM) roles and responsibilities should be outlined here. This should include how independence from the activity subject to audit will be achieved.

Insert a clear statement that the QM has been assessed as being SQEP with respect to the auditing of the CFAOS Organization. Details of the assessment process should also be included.

If the QM is not able to fulfil any of their responsibilities or there are any caveats to these responsibilities then they should be stipulated here, with reference to any associated MAA AAMC, waiver, or exemption and/or higher authority acceptance.

**1.2.4.2 Quality Manager Qualifications and Experience**

All relevant qualifications and experience for this post should be listed here.

**1.2.5 Safety Manager**

Reference: CFAOS Organization Safety Management Policy

The duties and responsibilities associated with this post are currently assumed by [Enter Name of Individual], who has been assessed as being SQEP, in support of the AM(MF).

**1.2.5.1 Safety Manager Roles and Responsibilities**

Details of the Safety Manager (SM) roles and responsibilities should be outlined here. This should include how independence from the activity subject will be achieved.

Insert a clear statement that the SM has been assessed as being SQEP with respect to the safety management activities of the CFAOS Organization. Details of the assessment process should also be included.

If the SM is not able to fulfil any of their responsibilities or there are any caveats to these responsibilities then they should be stipulated here, with reference to any associated MAA AAMC, waiver, or exemption and/or higher authority acceptance.

**1.2.5 2. Safety Manager Qualifications and Experience**

All relevant qualifications and experience for this post should be listed here.

### 1.3 CFAOS Meetings

Insert details of any specific meetings that have been established by or attended by the AM(MF) or his nominated representative. This detail should include frequency and purpose of the meeting. Agenda and Terms of Reference may be included as an appendix in Part 7 of the CFOE, with a cross reference to it included here.

### 1.4 Change Procedures

Reference: RA 1028(3): CFAOS Approval Changes

An application for scope amendment should be submitted at the earliest opportunity, and in any case before any changes which may affect the award of a CFAOS Approval Certificate and attendant Schedule takes place. This is to allow the MAA to determine continued compliance with the MRP and to amend, if necessary, the CFAOS Approval Certificate and/or Schedule. Any changes should only be implemented upon receipt of formal MAA approval.

**1.4.1 Continued Validity of Approval**

A CFAOS Approval will remain valid subject to:

1. The Organization remaining in compliance with the MRP.
2. The MAA being granted access to the CFAOS Organization to determine continued compliance with the MRP.
3. The Approval Certificate not being surrendered, suspended, or revoked.
4. Continued endorsement of UK MOD Interest and / or National interest.

**1.4.2 CFOE Review**

The CFOE will be reviewed at intervals not exceeding 12 months or more frequently when significant changes occur which affect the content of the CFOE.

Insert details of how these reviews will be conducted, including cross reference to any associated Quality or other procedures.

**1.4.3 Changes to the CFOE**

Insert details of those changes that are considered to be major (direct approval), how these changes will be implemented and who will manage this activity.

As a minimum, the MAA should be notified of changes to:

1. Name and details of the AM(MF).
2. Personnel named in the CFOE, including the Safety and Quality managers.
3. Air System types and marks to be operated.
4. The DAE operating Category / Categories, Test and Evaluation categories[[3]](#footnote-4), RPAS categories[[4]](#footnote-5) and any other aviation activities to be conducted.
5. Ownership of the CFAOS Organization.
6. The CFAOS organization’s official name, business name, address and/or mailing address.

If the Organization wishes to approve minor changes (indirect approval) to the CFOE, which have no impact on the Organization’s approval, paragraph 1.4.4 must specify what types of change are considered as minor and what the procedure is for these types of changes.

The primary version number for the CFOE will only be updated once the CFOE amendment has been ratified by the MAA, e.g., Version 1.0 to Version 2.0. Any changes to the CFOE that does not need to be ratified by the MAA (indirect approval by the CFAOS (see paragraph 1.4.4)) will be reflected in a change to the CFOE secondary version number e.g., Version 1.0 to Version 1.1.

**1.4.4 Minor Changes**

The following amendments can be incorporated into the CFOE without prior consent from the MAA (indirect approval), in accordance with [Enter Details of Local Procedure]:

Insert details of those changes that are considered to be minor (indirect approval), how these changes will be implemented and who will manage this activity.

Examples are:

1. Typographical errors.
2. Re-numbering of local procedures stipulated within the CFOE (assuming that the intent of the local procedure has not changed).
3. Editorial changes to procedures i.e., change of the words within the procedure without changing the intent of the procedure or the process.
4. Changes of named individuals within lower-level procedures, excluding AM(MF), Post Holders, Quality and Safety Managers.

 **1.4.5 Visual Change Convention**

Changes to the CFOE will be issued as and when the change analysis is complete and has been ratified by the MAA. All changes incorporated will be shown in red text.

# PART 2 SAFETY MANAGEMENT

Reference:

RA 1200: Air Safety Management

Manual of Air Safety

### 2.0 Safety Policy

The Safety Policy should as a minimum include a statement committing the organization to:

* 1. Recognise safety as a prime consideration at all times.
	2. Apply Human Factors principles.
	3. Encourage personnel to report flying, operations and maintenance related errors/incidents to meet MRP requirements.
	4. Recognise that compliance with procedures, quality standards and regulations is the duty of all personnel.
	5. Recognise the need for all personnel to cooperate with the MAA and Quality Auditors.
	6. This information may be included in the Organizations Air Safety Management Plan, with a cross reference inserted here.

# PART 3 QUALITY MANAGEMENT

Reference:

RA 1028(1): Organization

BS EN 9100/9001

### 3.0 Quality Policy

The Quality Policy should as a minimum include a statement committing the Organization to:

* 1. Recognise quality as a prime consideration at all times.
	2. Recognise that compliance with procedures, quality standards and regulations is the duty of all personnel.
	3. Recognise the need for all personnel to cooperate with the MAA and Quality Auditors.

### 3.1 General Information

This part of [Enter Organizations Name] CFOE defines the quality policy, planning and procedures, where necessary to meet the requirements of BS EN 9100/9001.

Provide evidence of a Quality Management System certified by a nationally accreditation body with a scope appropriate to the Organizations aviation operations under CFAOS.

The primary objective of the quality system is to enable the CFAOS to deliver safe aviation operations and remain compliant with the MRP requirements.

### 3.2 Integration with other Quality Systems

Insert details of how the CFAOS quality system has been integrated with the quality systems of other organizations involved in the delivery of CFAOS activities.

### 3.3 Monitoring of CFAOS Activities

Insert details of how all CFAOS activities will be audited by the CFAOS quality system, in particular sub-contracted/delegated activities and/or operations at remote or detached locations.

### 3.4 Monitoring MRP Compliance

Insert details of how compliance with the MRPs will be monitored by the CFAOS quality system, in particular sub-contracted/delegated activities.

###  3.5 Audit Personnel

Insert details of those personnel who will be conducting audits under the CFAOS quality system and how independence from the area being audited will be achieved.

 All quality audit personnel shall be suitably qualified, trained, and experienced to meet the requirements of the audit task. The Quality Manager shall have direct access to the AM(MF) and all parts of the Organization and sub-contractors’ organizations.

The post of Quality Manager and AM(MF) may be combined, in the case of small organisations. In this event audits, should be conducted by independent personnel (Quality Auditor) and it will not be possible for the AM(MF) Post Holders. (Applicable to a quality system only)

 **3.6 Quality Management Audit Reporting**

Insert details of how reports for each audit that has been completed will be promulgated to the AM(MF) and those personnel who need to take action to rectify findings.

### 3.7 Quality Management Audit Follow-up and Rectification Actions

Insert details of how follow-up or remedial action will be completed to the satisfaction of the AM(MF) and quality manager.

### 3.8 Quality Management Audit Plan

Insert a copy of or cross reference to the audit programme, which should identify how all aspects of compliance are checked annually, including sub-contracted/delegated activities. This may be included as an appendix in Part 7 of the CFOE, with a cross reference to it included here.

### 3.9 CFAOS Quality Management Procedures

Insert details of how the CFAOS quality system will verify and validate CFAOS procedures prior to their use and periodically review existing procedures.

# PART 4 PROCEDURES

Reference:

RA 1028(1):Organization

[Organizations] Operations Manual.

### 4.0 Procedures and Instructions

Insert appropriate detail of what procedures and instructions for the safe operation of each Air System type operated under the terms of its CFAOS Approval have been established. Describe Aircrew, Supernumerary Crew, and Supernumerary Support Crew and ground staff duties and responsibilities for all types of operation on the ground and in flight, cross referencing where necessary.

### 4.1 Flight Planning and Procedures

Insert details of how the CFAOS Organization provide adequate flight planning facilities and specify flight planning procedures to provide for the safe conduct of the flight based on considerations of Air System performance, other operating limitations, and relevant expected conditions on the route to be followed and at the aerodromes and / or operating sites concerned. These procedures should be included in the Operations Manual.

### 4.2 Local Flying Orders

Insert details of how the CFAOS Organization provides Local Flying Orders, including Post Crash Management and Airspace Integration. The procedures for assuming operation location suitability should be detailed, or cross referenced.

### 4.3 MOD Procedures

The CFAOS Organization should provide evidence of familiarity with MOD procedures applicable to appropriate flight activity, for instance Ordnance, Munitions and Explosives.

### 4.4 Operations Manual

A copy of the Operations Manual and the process for it upkeep may be lodged at Part 7 but must be included in the CFOE.

4.4.1 Detail the procedures for interaction and interfaces with:

 4.4.1.1 Maintenance Approved Organization Scheme (MAOS).

 4.4.4.2 Design Approved Organization Scheme (DAOS).

 4.4.1.3 Continuing Airworthiness Management Organizations (CAMO)

### 4.5 RA Applicability

Insert a list / statement of applicable RAs, including the method of compliance; this could be a list lodged at Part 7.

# PART 5 PERSONNEL AND TRAINING

### 5.0 Training Policy

This paragraph should detail the policy and procedures for ensuring that personnel are suitably trained, experienced, and qualified for their expected roles, including assessing training requirements and documenting outcomes.

This paragraph should describe how the training and qualification standards for personnel are assessed as appropriate for the size and complexity of the organisation. It should also explain how the need for recurrent training is assessed and undertaken, also how the training recording and follow-up is performed.

The organisation should review training needs at intervals not exceedingtwo years or at more frequent intervals if, and when, significant changes occur to the organisation, procedures and Air Systems operated.

### 5.1 Aircrew Qualifications

Insert appropriate detail of how compliance with RA 2101 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.2 Aircrew Competence in Role

Insert appropriate detail of how compliance with RA 2102 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.3 Currency and Continuation Training

Insert appropriate detail of how compliance with RA 2103 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.4 Aircraft Commanders

Insert appropriate detail of how compliance with RA 2115 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.5 Pilots’ Instrument Rating Scheme

Insert appropriate detail of how compliance with RA 2120 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.6 Aircrew Instructors and Aircrew Examiner Training

Insert appropriate detail of how compliance with RA 2125 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.7 Survival Equipment, Drills and Training

Insert appropriate detail of how compliance with RA 2130 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.8 Aircrew and Supernumerary Crew Medical Requirements

Insert appropriate detail of how compliance with RA 2135 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.9 Authorisation of Aircrew to Carry Out Maintenance Tasks

Insert appropriate detail of how compliance with RA 2211 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.10 Supervision of Flying

Insert appropriate detail of how compliance with RA 2305 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.11 Aircrew Fatigue Management

Insert appropriate detail of how compliance with RA 2345 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

### 5.12 Qualification, Approval and Use of Flight Simulator Training Devices

Insert appropriate detail of how compliance with RA 2375 AMC and GM is achieved and documented. This may be cross referenced to the Operations Manual.

# PART 6 SECURITY MANAGEMENT

Reference:

RA 1028(4): Contractor Flying Organization Exposition

### 6.0 Security Management

Detail the policy and procedures to be applied to ensure that the safety and integrity of the Air System is not compromised. This should, where necessary, include physical, electronic and data security management. Policy and procedures for planned or unplanned (e.g. Diversion) detached operations should be included.

# PART 7 APPENDICES

The part 7 appendices may be used by the CFAOS Organization to include information that would otherwise make the Part 1 to 6 unwieldy. The appendices below are suggested headings only and the CFAOS Organization should use their own discretion in determining what documents, forms links, etc should be included in Part 7 and whether they need to add or delete appendices to/from the list below.

### 7.0 Applicable RAs

This appendix should consist of a list / statement of applicable RAs. This may be used to form the detail part of the RA Applicability statement.

### 7.1 CFAOS Meeting Agendas and Terms of Reference

This appendix may be used to detail the agenda and terms of reference for those meetings identified in Part 1 of the CFOE.

### 7.2 Sample Documents

This appendix may be used to provide copies of documents that have been referenced within the CFOE. A statement that all documentation sent to the MAA has been certified by the applicant and found in compliance with the applicable requirements should be included.

### 7.3 Operations Manual

This appendix may be used to provide a copy of the extant Operations Manual.

### 7.4 Quality System Audit Plan

This appendix may be used to reflect the quality audit plan as detailed in Part 3 of the CFOE

### 7.5 Copy of Contracts for Sub-Contracted Work.

This appendix should consist of copies to the relevant contracts detailed in Part 1 of the CFOE. This may also include interface, Service Level Agreements, or similar documents.

### 7.6 Air Systems Managed by Organization

This appendix may be used to list details of the Air Systems managed by the Organization if not included in Part 1 of the CFOE.

1. Where Test and Evaluation (T&E) is included in the organization’s CFAOS approval schedule the Flight Operations post-holder’s responsibilities are to include T&E unless a dedicated T&E post-holder is deemed more appropriate for the structure of the Organization. [↑](#footnote-ref-2)
2. To cover aircrew training provided by the organization. [↑](#footnote-ref-3)
3. See RA 2370 – Test and Evaluation, for applicable test and evaluation terms. [↑](#footnote-ref-4)
4. Refer to RA 1600 – Remotely Piloted Air Systems. [↑](#footnote-ref-5)