

Appendix 1 to User Guide for ATO Manuals

Cross reference table

The suggested distribution below maybe used to prepare and produce an ATO Part ORA documentation system.

In all cases this table shall be used by a Part-ORA ATO to cross reference the content and the organisation of its manuals with those Part ORA requirements applicable to its scope of approval as appropriate to its size and complexity. The “ATO Doc Ref” column shall be filled accordingly. No cell shall be left empty. If not applicable the “ATO Doc Ref” cell related to the “Part ORA ref” shall contain an “N/A” entry. The requirements marked N/R in the table are not to be considered.

Item ID	Part ORA Ref	ATO Doc Ref	Suggested distribution				Note	FOR CAA USE ONLY		
			N/R	OMM	OM	TRM		Content		Notes
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1.	ORA.GEN.115 (b)			X			<u>Documentation demonstrating how the ATO will comply with the requirements established in Regulation (EC) No 216/2008 and its Implementing Rules:</u> Cross reference table to demonstrate that all applicable requirements are covered in one way or another by the proposed documents. <u>Procedure describing how changes not requiring prior approval will be managed and notified to the competent authority:</u> Formal description of the procedure and related process (see also ORA.GEN.130 (c))			
2.	ORA.GEN.120 (a)			X			Cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b) shall include all applicable AMCs and GM implemented by ATO			
3.	ORA.GEN.120 (b)			X			Description of related process/procedures to meet the requirement			

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4.	ORA.GEN.125			X			In case the organisation is approved under multiple regulation systems (Own National Regulation, EU Part-ORA, other Third Country National Regulations ...) the ATO shall have a process described and implemented to ensure that activities under the scope of Part-ORA approval are clearly identified and distinguished from other activities conducted under other approval systems. The manual shall indicate how these activities are related to different independent processes. Any potential uncertainty between activities conducted under different approvals shall be identified and addressed so that the approved training remains continuously within the scope and privileges defined in the terms of approval attached to the organisation's Part-ORA certificate. Example: Delivering a <u>Part FCL course completion certificate</u> related to a course for a licence, rating, certificate, authorisation and/or qualification <u>out of the scope of the organisation's LVCAA Part-ORA approval</u> (Such as a course for a licence not compliant with Part FCL regulation) shall be <u>efficiently prevented</u>			
5.	ORA.GEN.130 (a)(1)			X			A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)			

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6.	ORA.GEN.130 (a)(2)			X			A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)			
7.	ORA.GEN.130 (b)			X			Description of related process/procedures to meet the requirement			
8.	ORA.GEN.130 (c)			X			Description of related process/procedures to meet the requirement			
9.	ORA.GEN.135 (a)(3)			X			Description of related process/procedures to meet the requirement			
10.	ORA.GEN.135 (b)			X			Description of related process/procedures to meet the requirement			

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11.	ORA.GEN.140 (a)			X			<p>A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e).</p> <p>Confirmation that there is no restricted access resulting from special local regulation(s). If special procedures are needed to access restricted areas, the process to grant access in compliance with ORA.GEN.140 shall be described and implemented.</p> <p>Failure to give LVCAA (or the entity conducting the technical investigation e.g. EASA) access to the organisation's facilities as defined in ORA.GEN.140 during normal operating hours and after two written requests may result in a level 1 finding as provided by ARA.GEN.350 (b)(1)</p>			
12.	ORA.GEN.140 (b)						When applicable, the ATO will be informed to enable the organisation to address this requirement as indicated in ORA.GEN.140 (a)			
13.	ORA.GEN.155 (a)			X			<p>Shall be part of the compliance monitoring required by ORA.GEN.200 (a)(6)</p> <p>Shall be included in cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b)</p>			

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14.	ORA.GEN.155 (b)			X			<p>Shall be part of the compliance monitoring required by ORA.GEN.200 (a)(6)</p> <p>Shall be included in the cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b)</p>			
15.	ORA.GEN.160 (a)			X			<p>Description of related process/procedures to meet the requirement</p> <p>A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)</p>			
16.	ORA.GEN.160 (b)			X			<p>Description of related process/procedures to meet the requirement.</p> <p>A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)</p>			
17.	ORA.GEN.160 (c)			X			<p>Description of related process/procedures to meet the requirement</p> <p>A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)</p>			

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18.	ORA.GEN.160 (d)			X			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)			
19.	ORA.GEN.160 (e)			X			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)			
20.	ORA.GEN.200 (a)(1)			X						
21.	ORA.GEN.200 (a)(2)			X						
22.	ORA.GEN.200 (a)(3)			X						
23.	ORA.GEN.200 (a)(4)			X						
24.	ORA.GEN.200 (a)(5)			X			Management system key processes shall be clearly identified and listed in cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b)			
25.	ORA.GEN.200 (a)(6)			X						
26.	ORA.GEN.200 (a)(7)			X			The ATO shall consider relevant AMCs and GM related to the evidence of sufficient funding as an additional requirement			

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27.	ORA.GEN.200 (b)			X			Taking into account the hazards and associated risks inherent in these activities: Shall be demonstrated according to ORA.GEN.200 (a)(3)			
28.	ORA.GEN.205 (a)			X			Description of related process/procedures to meet the requirement			
29.	ORA.GEN.205 (b)			X			Description of related process/procedures to meet the requirement			
30.	ORA.GEN.210 (a)			X						
31.	ORA.GEN.210 (b)			X			The compliance monitoring system shall be described including the list, the role and the responsibilities of each individual, be it one single person or a group			
32.	ORA.GEN.210 (c)			X			Description of related process/procedures to meet the requirement			
33.	ORA.GEN.210 (d)			X						
34.	ORA.GEN.210 (e)			X			This requirement shall be part of the document control process as described in paragraph 4			
35.	ORA.GEN.215			x/p	x/p	x/p	Description of related process/procedures to meet the requirement. List of such facilities with related characteristics and scope of use (to be included in OM or TRM as appropriate).			
36.	ORA.GEN.220 (a)			X						
37.	ORA.GEN.220 (b)			X						

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38.	ORA.GEN.220 (c)			X			Applicable data protection legislation shall be stated and personnel made aware of their roles and responsibilities in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e). A process to inform trainees shall be described and implemented			
39.	ORA.ATO.105 (a)(1)(i)			X			Should match the information provided in the Application From			
40.	ORA.ATO.105 (a)(1)(ii)			X			Should match the information provided in the Application From			
41.	ORA.ATO.105 (a)(1)(iii)			x/p	x/p	x/p	Should match the information provided in the Application From Nominated post holders, qualifications requirements, training requirements and administrative roles can be described in the OMM. Functions, roles and responsibilities related to operations and training can be described in OM and TRM respectively See for example: ORA.ATO.110 (a), ORA.ATO.110 (b)(1), ORA.ATO.110 (b)(2), ORA.ATO.110 (b)(3), ORA.ATO.110 (c)(1), ORA.ATO.110 (c)(2) below			

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42.	ORA.ATO.105 (a)(1)(iv)			x/or	x/or	x/or	Should match the information provided in the Application From. When providing flight training on aircraft or balloons, an ATO shall have continuous use of an airport and a pilot briefing area. This can be demonstrated by the school having a written agreement showing that it has continuous use of those facilities for at least the time needed to complete the training courses covered by the approval at the time of certification or renewal of certificate.			
43.	ORA.ATO.105 (a)(1)(v)					X	Should match the information provided in the Application From. If a training aircraft is not own by the PTO, details of the contracts or arrangements related to its use for training and all related processes and procedures shall be documented			
44.	ORA.ATO.105 (a)(1)(vi)			x/or	x/or	x/or	Should match the information provided in the Application From. If FSTDs are not owned by the PTO, details of the contracts or arrangements related to its use for training and all related processes and procedures shall be documented			

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45.	ORA.ATO.105 (a)(1)(vii)					X	<p>Courses to be provided under the scope of the LVCAA Part-ORA approval sought, shall be indicated so that:</p> <ul style="list-style-type: none"> The course name or identifier is unique for each course but also unique for each different version of the same course (if any). Similar courses with different syllabuses or entry levels, different breakdown or sequencing of the theoretical / flight / simulator sessions, are to be considered different. The course FCL type indicated refers to a Part-FCL course as identified by the relevant requirement in Aircrew regulation 1178/2011 as amended. <p>Examples:</p> <ul style="list-style-type: none"> Course name or ref. ... PPL-08V001b; For a course according to ... PPL(A) FCL.210.A(b) Indicating a PPL(A) course for ... trainees holding a LAPL(A) Course name or ref. ... PPL-09V002; For a course according to ... PPL(A) FCL.210.A(c) Indicating a PPL(A) course for ... trainees holding a LAPL(S)+TMG Course name or ref. ... ATPL-A1/05 For a course according to ... ATPL(A) Part-FCL Annex I §3.1 Indicating an ATPL theoretical ... bridge course from (H) to (A) Course name or ref. ... ATPL-H2/01 For a course according to ... ATPL(H) Part-FCL Annex I §3.1 Indicating an ATPL theoretical ... bridge course from (A) to (H) <p>This list of courses must match the information provided in the Application Form</p>			

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46.	ORA.ATO.105 (a)(2)				X	X	Manuals to be provided for initial approval and reviewed for approval continuation. These manuals shall be submitted to the document control process described in paragraph 4			
47.	ORA.ATO.105 (b)(1)			x/or	x/or	x/or	See note related to item 42 for ORA.ATO.105 (a)(1)(iv)			
48.	ORA.ATO.105 (b)(2)			x/or	x/or	x/or				
49.	ORA.ATO.105 (c)			x/or	x/or	x/or	The related document(s) shall be updated accordingly			
50.	ORA.ATO.110 (a)			X			See note related to item 41 for ORA.ATO.105 (a)(1)(iii)			
51.	ORA.ATO.110 (b)(1)					X	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)			
52.	ORA.ATO.110 (b)(2)					X	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)			
53.	ORA.ATO.110 (b)(3)					X	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)			
54.	ORA.ATO.110 (c)(1)			X			See note related to item 41 for ORA.ATO.105 (a)(1)(iii). For each instructor the documents provided shall indicate which option of ORA.ATO.110 (c) applies			
55.	ORA.ATO.110 (c)(2)			X			See note related to item 41 for ORA.ATO.105 (a)(1)(iii) For each instructor the documents provided shall indicate which option of ORA.ATO.110 (c) applies			

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56.	ORA.ATO.110 (d)			X			Description of related process/procedures to meet the requirement			
57.	ORA.ATO.120 (a)					X	Description of related process/procedures to meet the requirement			
58.	ORA.ATO.120 (b)					X	Description of related process/procedures to meet the requirement			
59.	ORA.ATO.120 (c)				X		Description of related process/procedures to meet the requirement			

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60.	ORA.ATO.125 (a)					X	<p>The organisation is expected to describe and implement a course design process to demonstrate its capacity to develop a training programme for each course offered. The organisation should be able to address following aspects (as applicable):</p> <ul style="list-style-type: none"> • Course type (initial training / recurrent training / refresher training / specific training, ...) • Course objectives • Entry level criteria / Students' prior abilities, competence, knowledge & skill / determination / assessment • Identification of training needs of all potential trainees / group of profiles ... • Instructional strategies / Training methodology / Course Structure / Syllabus / Sequencing / Timing • Objective breakdown / Module specification / design • Training material specification / design / production / procurement • Planning / calendar / course pace • Training standards • Training delivery / Resources / Equipment / Facilities • Instructors / Subject Matter Experts / Examiners / Assessors / Tutors / HR • Knowledge progress assessment / Attitude / Skill / evaluation / criteria • Hazard Identification / analysis / negative learning / undetected shortages in training provided / Human factors / Fatigue management / ... • Risk mitigation and management / flight safety / ... • Course validation / control • Course updating (new methods / changes in regulation) • Continued performance monitoring and improvement ... 			

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61.	ORA.ATO.125 (b)					X	<p>The cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b) shall include all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO.</p> <p>A separate cross reference table including all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO is acceptable if it is clearly identified as part of the organisation's documentation system</p>			
62.	ORA.ATO.130 (a)			x/p	x/p	x/p	<p>The OMM shall contain a description of related management process/procedures to meet the requirement.</p> <p>This requirement shall be part of the document control process as described in paragraph 4</p> <p>The OM and the TRM shall comply with the format, the identification, the validation, the distribution and any additional requirements established in the OMM for each manual.</p>			
63.	ORA.ATO.130 (b)			x/p	x/p	x/p	<p>The OMM shall contain a description of related management process/procedures to meet the requirement.</p> <p>This requirement shall be part of the document control process as described in paragraph 4</p> <p>The OM and the TRM shall comply with the format, the identification, the validation, the distribution and any additional requirements established in the OMM for each manual.</p>			

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64.	ORA.ATO.130 (c)						<p>The cross reference table referred to in the note of item 1 of this table related to ORA.GEN.115 (b) shall include all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO.</p> <p>A separate cross reference table including all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO is acceptable if it is clearly identified as part of the organisation's documentation system</p>			
65.	ORA.ATO.130 (d)						<p>Description of related process/procedures to meet the requirement</p> <p><u>Note:</u> Before entry into force of Part ORO, Regulation (EC) No 859/2008 of 20 August 2008 applies (particularly subpart Q)</p> <p>A PTO is expected to develop procedures and implement processes related to fatigue management based on the principles of safety management so that the risks associated with fatigue of trainees and/or instructors do not negatively impact flight safety during training or result in training deficiencies creating latent conditions with the potential to breach aviation system defences (well after the pilot has finished his training).</p> <p>ICAO Doc 9966 provides guidance for the implementation of Fatigue Risk Management Systems and may be used to adapt the system to the size and complexity of the PTO.</p>			

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66.	ORA.ATO.135 (a)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(v) The process ensuring and maintaining adequacy shall be described, implemented and monitored.			
67.	ORA.ATO.135 (b)(1)					X	Additional guidance is provided in LVCAA PEL User Approval Procedure LVA/TGL_FSTD/2011/002 (as amended)			
68.	ORA.ATO.135 (b)(2)					X	See note for ORA.ATO.125 (b)			
69.	ORA.ATO.135 (b)(3)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(vi) The process ensuring and maintaining adequacy shall be described, implemented and monitored Additional guidance is provided in LVCAA PEL User Approval Procedure LVA/TGL_FSTD/2011/002 (as amended)			
70.	ORA.ATO.135 (b)(4)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(vi) The process ensuring and maintaining adequacy shall be described, implemented and monitored Additional guidance is provided in LVCAA PEL User Approval Procedure LVA/TGL_FSTD/2011/002 (as amended)			
71.	ORA.ATO.135 (c)					X	Description of related process/procedures to meet the requirement			
72.	ORA.ATO.135 (d)					X	Description of related process/procedures to meet the requirement			

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73.	ORA.ATO.140			x/p	x/p		See note for ORA.ATO.105 (a)(1)(iv) The operational information and procedure shall be described in the OM The process ensuring and maintaining adequacy shall be described in the OMM, implemented and monitored			
74.	ORA.ATO.145 (a)					X	See note for ORA.ATO.125 (b) The process ensuring and maintaining compliance with the requirement shall be described, implemented and monitored			
75.	ORA.ATO.145 (b)					X	See note for ORA.ATO.125 (b) The process ensuring and maintaining compliance with the requirement shall be described, implemented and monitored			
76.	ORA.ATO.150 (a)					X	See note for ORA.ATO.125 (a)			
77.	ORA.ATO.150 (b)					X	this information shall also be provided to trainees			
78.	ORA.ATO.210 (a)			X			See note for ORA.ATO.105 (a)(1)(iii)			
79.	ORA.ATO.210 (b)			x/p		x/p	See note for ORA.ATO.105 (a)(1)(iii)			
80.	ORA.ATO.210 (c)			x/p		x/p	See note for ORA.ATO.105 (a)(1)(iii)			
81.	ORA.ATO.225 (a)					X	See note for ORA.ATO.125 (a)			
82.	ORA.ATO.225 (b)					X	See note for ORA.ATO.125 (a)			
83.	ORA.ATO.230 (a)					X	See note for ORA.ATO.125 (a)			
84.	ORA.ATO.230 (b)					X	See note for ORA.ATO.130 (b)			
85.	ORA.ATO.300 (a)					X				

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86.	ORA.ATO.300 (b)					X				
87.	ORA.ATO.300 (c)					X				
88.	ORA.ATO.305 (a)					X				
89.	ORA.ATO.305 (b)					X				
90.	ORA.ATO.305 (c)					X				
91.	ORA.ATO.310					X				
92.	ORA.ATO.330 (a)					X	Commercial air transport operators shall hold an EU AOC			
93.	ORA.ATO.330 (b)					X				
94.	ORA.ATO.330 (c)					X				
95.	ORA.ATO.335 (a)					X	Additional guidance is provided in LVCAA PEL User Approval Procedure LVA/TGL_FSTD/2011/002 (as amended)			
96.	ORA.ATO.335 (b)					X	Additional guidance is provided in LVCAA PEL User Approval Procedure LVA/TGL_FSTD/2011/002 (as amended)			
97.	ORA.ATO.350					X	Commercial air transport operators shall hold an EU AOC			
98.	ORA.ATO.355 (a)(1)					X	See note for ORA.ATO.125 (b)			
99.	ORA.ATO.355 (a)(2)					X				
100.	ORA.ATO.355 (b)					X				

X: applicable
x/p: partly applicable
x/or: applicable, either option can be considered