



Australian Government
Civil Aviation Safety Authority

SOUTHERN REGION

File Ref: EF10/2358

10 May 2010

Mr Bruce Buchanan
Chief Executive Officer
Jetstar Airways Pty Ltd
Level 1, 473 Bourke Street
MELBOURNE VIC 3000

Dear *Sir Bruce*

Further to the exit meeting held on 9 April 2010, please find attached a CASA Audit report formalised for your attention.

May I reiterate the appreciation for your assistance and co-operation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Max McGregor', written in a cursive style.

Max McGregor
Manager
CASA Operations Air Transport
Southern Region



AUDIT REPORT

ARN: 510654
Operator's Name: Jetstar Airways Pty Limited
Trading Name: Jetstar
Location(s) of Audit: Melbourne
Audit Period: 6 - 9 April 2010
Certificates Audited: AOC

Audit Scope:
(Systems)

3 Flight Operations
4 Personnel, Training & Qualifications
6 Aircrew & Crew Flight, Rest & Duty Time

Audit Scope:
(Sub-Systems)

3.1 Air Operator Programmes and Procedures
3.2 Operational Release
4.2 Training Programme
6.1 Crew Member Limitations

Audit Findings:
(Type & Number)

Safety Alerts:	0
Requests for Corrective Action:	0
Observations:	12

Audit Team Members: Grant Howard
Ross Dennerstein
Ben Cook

Lead Auditor: Grant Howard

Signature: *Grant Howard* Date: 10/5/10



Authority for conduct of the audit

The audit identified in this report was carried out by CASA in pursuance of its functions under Section 9 of the Civil Aviation Act 1988

Confidentiality

This audit report is a confidential document between CASA and Jetstar Airways Pty Limited. CASA will not disclose this report or any part of it to any third person except, in pursuance of its functions, with the express permission of Jetstar Airways Pty Limited, or as required by law.

Audit Method

The audit is a sampling exercise and does not purport to be a total systems review. The sampling provides a snapshot of the system and any deficiencies detected could point to a systemic problem, requiring a total systems review by the operator. Deficiencies and problems identified in the audit findings must be addressed by the operator as outlined below:

Audit Findings

Audit findings may be in the form of a Safety Alert (SA), and/or Request for Corrective Action (RCA), or an Audit Observation (AO).

RCA (Request for Corrective Action)

RCAs detail deficiencies that involve non-compliance with legislation and must be addressed. The deficiency is described in the 'Details of deficiency', and the regulatory basis for the assessment is stated in the 'criteria' section.

For RCAs, the following actions must be taken to address the deficiency/deficiencies:

- 1) Remedial action(s) to remedy the immediate situation so that operations are brought within safe parameters;
- 2) Investigative action to investigate the deficiency/problem and determine the root cause;
- 3) Corrective action(s) to address the root cause of the problem.

Jetstar Airways Pty Limited must record both the remedial and corrective action taken on the 'Recipient's Response' page of the RCA and return it to the address shown by the due date. Where the corrective action cannot be completed by the due date, Jetstar Airways Pty Limited must indicate the date by which the corrective action will be completed.

In some instances, CASA may require the recipient to provide to CASA a detailed plan, approved by the Certificate Holder's authorised representative. The plan must include a statement of work, resources, and the timeline for completion of corrective actions. CASA will make an assessment as to whether the plan can satisfactorily address the legislative breach(es).

(As an example: the REMEDIAL ACTION to address an identified deficiency of 'cabin crew not currently trained in emergency procedures' would be to conduct training for all affected staff. The CORRECTIVE ACTION would be to document and implement a system for training, recording, reporting and warning of pending expiry dates for all initial and recurrent training).

[Note: To avoid unnecessary pages in this report, only one copy of the 'Recipient's Response' page is included at the end. Please photocopy or replicate as required].



Audit Findings (contd)

Safety Alerts

A SAFETY ALERT is a particular type of REQUEST FOR CORRECTIVE ACTION that must be addressed IMMEDIATELY. As the holder of the certificate, licence, CASA approval or authority, Jetstar Airways Pty Limited must take action to ensure that the deficiency is rectified carrying out RCA steps 1, 2 and 3 above:

- before continuing operation of the aircraft concerned; or
- before continuing any activity carried out under the certificate or licence or approval or authority held that is the subject of the deficiency.

Audit Observations

An AUDIT OBSERVATION is raised to draw attention to latent conditions or minor deficiencies in a system that cannot be attributed to a current legislative requirement. The intention is to raise awareness with a view to avoiding problems in the future.

Response to AUDIT OBSERVATIONS is not required. However, auditees would be well advised to take appropriate action as part of their continuous improvement processes. Actions taken may be covered in future surveillance.

CROS (CASA Regulatory Oversight System)

Introduction

The CASA Regulatory Oversight System (CROS) is being tested by Airline Operations Branch and has been developed from the FAA ATOS system. CROS identifies Systems, Sub-systems and Elements used by a typical AOC and COA holder.

The intention is for Airline Operations to use CROS as a tool to ensure that each system used by a Certificate Holder will be prioritised and audited, subject to the available resources, over a three-year period. The Certificate Holder will be notified of the systems to be audited.

Management System Model (MSM)

CASA will use the MSM to analyse data in a structured way through the various stages of a systems audit, namely, preparation, conduct, reporting and follow up. This model provides an overarching framework for building a sound management system and is based on internationally recognised management system standards.

The MSM consists of four Systems Attributes; namely, Management Responsibility, Infrastructure, Process in Practice, and Monitoring and Improvement. The Attributes are made up of one or more Components, totalling twelve in all. Some of the Components are broken down into Sub-components for guidance to the auditee; CASA only reports to Component level.

1) Management Responsibility

Management Responsibility ensures responsibilities and authority are defined for the processes, and that management have ensured the processes are adequately designed and implemented.

2) Infrastructure

Infrastructure must be in place to support the operation.



3) **Process in Practice**

Process in Practice assesses the effectiveness of documented procedures in describing the processes, the level of implementation of the procedures, and the effective use of infrastructure supporting the process.

4) **Monitoring and Improvement**

As a result of auditing a number of processes, an overall assessment of the Monitoring and Improvement systems can be made.

The following table shows the Systems Attributes and Components which will be referenced in this Audit Report (Sub-components are not reported on, but have been included for information).

Systems Attributes	Components	Sub-components
Management Responsibility	Management Commitment	Policy
		Responsibility and Authority
		Nominated Management Representative
	Planning	Objectives and Quality/Safety Planning
		Internal Communication and Consultation
		Hazard Identification and Risk Management
	Management Review	
Infrastructure	Facilities	
	Tools, Equipment and Materials	
	Data, Information and Records	
	Personnel	
Process in Practice	Process in Practice	
Monitoring and Improvement	Internal Audit	
	Internal Reporting	
	Investigation	
	Remedial, Corrective and Preventive Action	Remedial Action
		Corrective Action
		Preventive Action

Each Safety Alert (SA), Request for Corrective Action (RCA) and Audit Observation will identify a Component of a System's Attribute. All the Attributes are collated and presented in pie charts contained in the Audit Overview. A summary of the Systems Attributes across the audit will also be included in the Executive Summary.



Upon completion of the investigation into the findings of the SA or RCA, the "root cause" portion of the RCA response form is to be completed by the auditee.

Root Cause

Identifying a Component of a Systems Attribute in the SA, RCA or AO serves as a pointer to a deficient process in the auditee's management system. However, auditees should investigate to confirm it and to identify the specific deficiency in the process that needs to be corrected.

In the interests of aviation safety, it is the expectation of CASA that the Certificate Holder investigates and uncovers the root cause(s) of the safety deficiency being presented. Only through proper identification of the causal factors, and taking appropriate safety measures, can the aviation safety level be improved.

CONTENTS

This report is generated from a database record and, depending on the content, will comprise a suitable combination of the following standard sections:

- Cover Sheet**
- About this Report**
- Executive Summary**
- Audit Overview or Index of Findings**
- System Summaries (Graphical or Text)**
- Safety Alerts (SA)**
- Requests for Corrective Action (RCA)**
- Audit Observations (AO)**

Each section is individually numbered. This facilitates the addition or removal of particular items during the creation of the report, without requiring a re-numbering of the whole document. The page header will clearly show both the section and page sequence number in each case. If attachments (e.g. photographs) are required, they will be included at the back of the report and may be manually annotated with appropriate references (e.g. File Ref + Attachment Number). If you have any questions regarding the composition of this report, please contact the Lead Auditor, whose name appears on the front cover. [Tel: 131757]



Jetstar Airways Pty Limited

6 - 9 April 2010

A special audit was carried out at the Jetstar Head Office at Melbourne. The scope included flight crew planning, rostering and day of operations systems underpinning the CAO 48 exemption which Jetstar operates under. Operational interfaces with the operator's safety management system also formed part of the scope. In addition, the auditors took the opportunity to examine the company's policy, procedures and standards concerning English language proficiency for cabin crew.


The flying operations findings were made on the policy controls and impact of commercial imperatives on interpretation of flight and duty time legislation, adequate rest, fatigue management, inexperienced crew, Sabre system interfaces and flight crew acting as cabin crew. A finding was also made in the area of alternate fuel planning

The SMS interface assessment indicated that there is a reliance on reactive reporting for fatigue risk matters. A more proactive fatigue risk management program was demonstrated to be at the concept stage. Currently the CAO 48 exemption appears to act as the primary means of managing flight crew fatigue risk. A more complete assessment of the SMS interface will be incorporated during the Jetstar AOC audit in May 2010.

The auditors also reviewed the means by which Jetstar initially assesses and assures continuing English language standards for cabin crew. This was seen as particularly important in relation to safety-related cabin crew duties including pre flight safety briefings at emergency exits where strict liability conditions of CAR 208 permissions apply.

The auditors appreciated the efforts of Jetstar management and staff in facilitating relevant personnel interviews.

Lead Auditor: Grant Howard

Signature: 

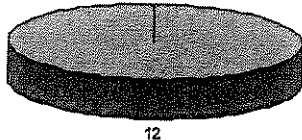

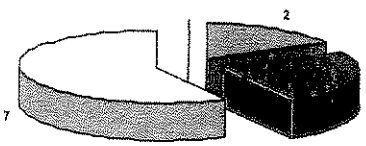
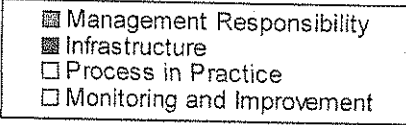
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Jetstar Airways Pty Limited

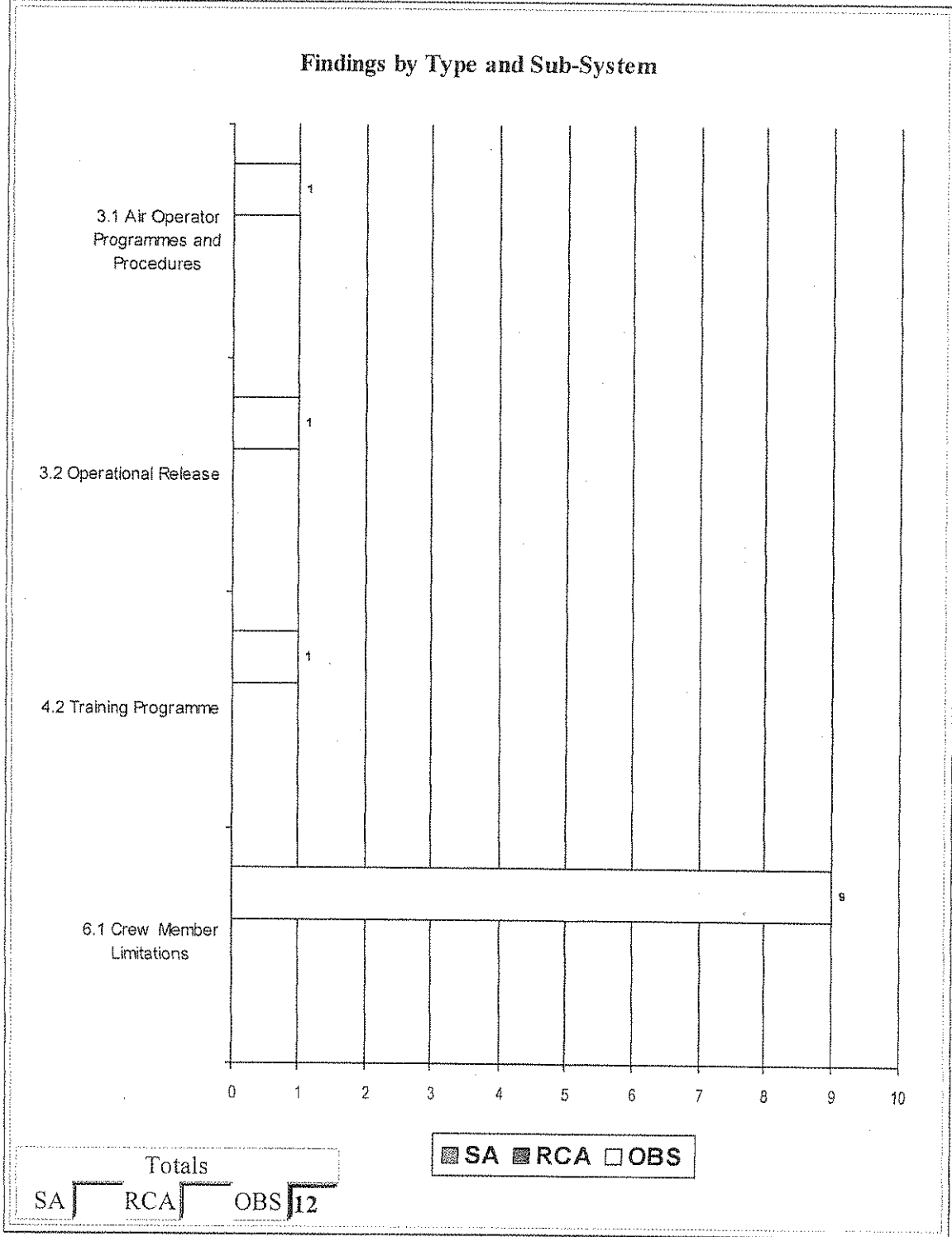
6 - 9 April 2010

Findings Distribution

Location(s): Melbourne Lead Auditor: Grant Howard Team Members: Ross Dennerstein Ben Cook	
Elements included in Audit Scope: 3.1.02 Cabin Crew Duties / Cabin Procedures 3.2.01 Flight Planning & Dispatch 4.2.04 Training of Cabin Crew Members 6.1.02 Flight Crew Member Flight / Duty / Rest Time	Total number of Findings by type:  12 
	Number of Findings (all types) by System Attribute  
	Number of RCAs (incl. SAs) by System Attribute:



Findings Summary:





Audit Observations

Ref No in Section

3.1.02 Cabin Crew Duties / Cabin Procedures

Use of Pilots as Cabin Crew	11
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3.2.01 Flight Planning & Dispatch

Provision of Alternates	7
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4.2.04 Training of Cabin Crew Members

Cabin Crew - English Language Proficiency	12
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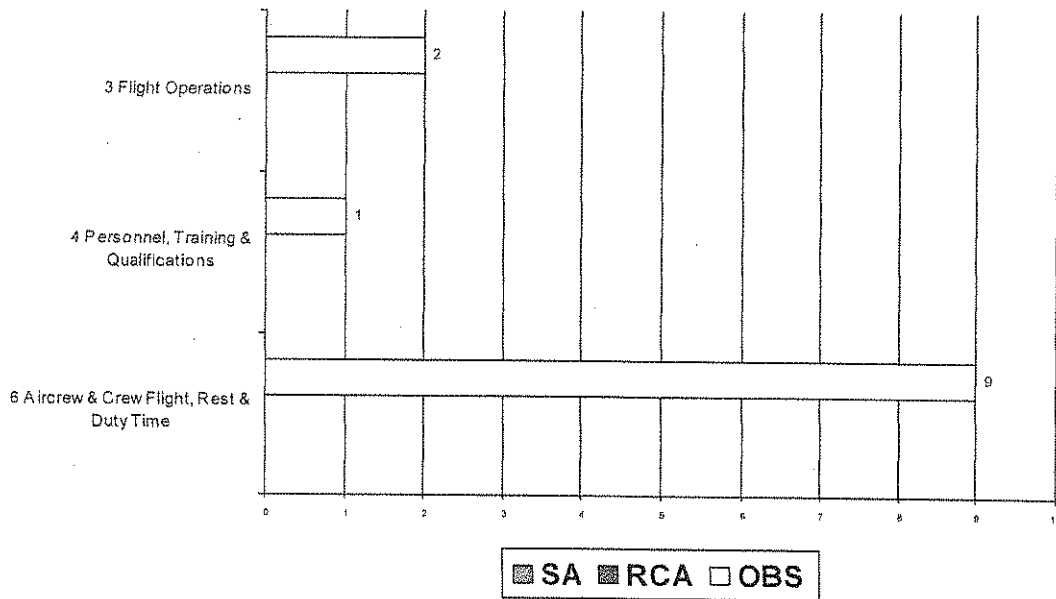
6.1.02 Flight Crew Member Flight / Duty / Rest Time

Appropriate Use of CAO 48 Exemptions	1
Application of the CAO 48 Exemptions	2
Guidelines for Crewing Officers	3
Crew Positioning Flights Prior to Duty	4
Acceptance of Extensions to Duty Periods	5
General Policy Provisions	6
Use of Minimum Turnaround Times	8
Rostering of Standby	9
Contacting Crew During Rest Periods	10

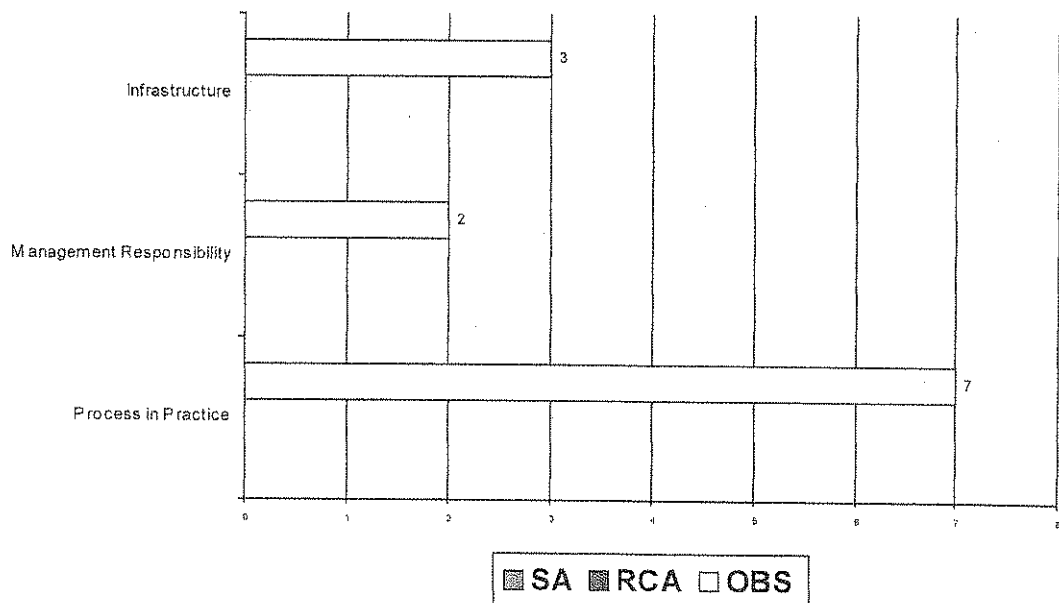


The charts on this page show how the audit findings were distributed against the CROS Systems and the CASA Management System Model.

Findings by Type and CROS System



Findings by Type and MSM Attribute





CASA Regulatory Oversight System This Pivot Table shows the Total Findings distribution by CROS Element and MSM Component. Safety Alerts are shown in Red, RCAs in Black, and Observations in Green. ELEMENT	C O M P O N E N T	Data, Information and Records	Management Commitment	Process in Practice
3.1.02 Cabin Crew Duties / Cabin Procedures		1		
3.2.01 Flight Planning & Dispatch		1		
4.2.04 Training of Cabin Crew Members				1
6.1.02 Flight Crew Member Flight / Duty / Rest Time		1	2	6
Grand Total		3	2	7



3 Flight Operations

Infrastructure

Data, Information and Records

7	OBS	3.2 Operational Release	3.2.01 Flight Planning & Dispatch
11	OBS	3.1 Air Operator Programmes and Procedures	3.1.02 Cabin Crew Duties / Cabin Procedures

4 Personnel, Training & Qualifications

Process in Practice

Process in Practice

12	OBS	4.2 Training Programme	4.2.04 Training of Cabin Crew Members
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6 Aircrew & Crew Flight, Rest & Duty Time

Infrastructure

Data, Information and Records

8	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
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Management Responsibility

Management Commitment

5	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
6	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time

Process in Practice

Process in Practice

1	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
2	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
3	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
4	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
9	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time
10	OBS	6.1 Crew Member Limitations	6.1.02 Flight Crew Member Flight / Duty / Rest Time

SYSTEM COMMENTS

This section shows the Auditors' comments in relation to each System when provided. As an audit may not always cover enough elements to justify a system comment, this section may be blank.



Reference No: EF10/2358 - 1
Subject / Title: Appropriate Use of CAO 48 Exemptions
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

There is no definition of "International" and "Domestic" in the Standard Industry Exemptions of CAO 48. This can potentially lead to misinterpretation of intent as was tested recently in the Jetstar Darwin Base. The Jetstar Darwin base is one of the first examples of a base operation consisting predominantly of short haul late night international operations by an Australian operator.

The International Exemption was developed before this type of operation generally existed. The International Exemption was primarily designed for long haul operations and the Domestic Exemption was primarily designed for short haul operations. The use by Jetstar of the International Exemption has enabled crews to be rostered for up to 6 consecutive days of late night operations, if flying international short haul. Flight crews can also be rostered for a combination of late nights and early starts, without as many safeguards against fatigue, when using the less restrictive International Exemption for short haul operations.

The lack of definition for these exemptions appears to have encouraged the use of the International Exemption for domestic flying; thereby avoiding application of the late night operations provision; which Jetstar had previously been incorrectly applying until May. In this model, Jetstar deemed that any flight with an international flight number was to use the International Exemption, even if it was a domestic sector.

CASA acknowledges that Jetstar have voluntarily revised that interpretation and are now adopting the more conservative policy that an international flight is any flight where the crew must pass through customs. In the interests of providing a more robust safety provision in this context, Jetstar may wish to consider using the Domestic Exemption for international short haul operations to further reduce the potential for pilot fatigue.

Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice



Reference No: EF10/2358 - 2
Subject / Title: Application of the CAO 48 Exemptions
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

When managers were questioned as to how Jetstar managed flight crew fatigue the unanimous response was by applying the rules of the Standard Industry Exemptions to CAO 48. As this was the only acknowledged method for managing fatigue available to Jetstar managers then it is reasonable to expect that managers would apply a conservative interpretation of this exemption's rules. However, it is evident that the practice has been to interpret the rules in a way that caters to commercial imperatives, such as the use of split standby to increase pilot duty times and the EBA to contact pilots during rest periods.

When managers were asked if there were any other ways to manage fatigue risk they indicated that they used FAID reactively to analyse patterns that had been reported. It should be noted that the Standard Industry Exemptions were not designed as a fatigue management tool and only provide empirical limits to pilot flight and duty times. It is an operator responsibility to ensure that there are adequate controls in place to prevent pilots from becoming fatigued as a result of rostering practices.

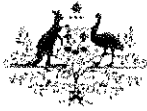
Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice

Reference No: EF10/2358 - 3
Subject / Title: Guidelines for Crewing Officers
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

During the audit a Crewing Manager was asked how crewing officers ensured that flight crews were not rostered to operate a fatiguing duty. The manager produced a list of guidelines for crewing officers to take into account when crewing a flight. However, the manager stated that it can be difficult for a crewing officer because of the sometimes conflicting demands of crewing a flight and also ensuring that the crew is adequately rested for the duty to be undertaken.

The manager agreed that the guidelines may not be adequate under these circumstances and that a policy, together with rules that were built into the system, would provide better controls to prevent fatigue.

Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice



Reference No: EF10/2358 - 4
Subject / Title: Crew Positioning Flights Prior to Duty
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

CAO 48.0 defines deadhead transportation as "the period from the time a flight crew member reports for the purpose of making a positioning flight until the positioning flight is completed." While OM 1 refers to deadheading in several sections it is not defined in the manual. Jetstar has developed a policy to assist flight crew that are commuting resulting from their forced relocation to Darwin. The policy assists flight crew by providing a free of charge firm booking so that the flight crew can position from home to conduct a duty. Jetstar hold the view that the flight crew are travelling on their 'own time' and have not counted the positioning flight as duty. However, Jetstar shares the responsibility to ensure that crew members are not commencing duty when fatigued. In this context, the policy does not include provisions to ensure crew members using this facility are adequately rested before sign-on (eg by early positioning and a local rest period).

Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice

Reference No: EF10/2358 - 5
Subject / Title: Acceptance of Extensions to Duty Periods
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

There is a lack of supportive statements in company manuals indicating that Jetstar will not punish flight crew who elect not to extend a duty under OM 1 para 5.2.1.3 and that no one has the authority to require a pilot to extend.

Auditor Inits / Date: RD 07/05/10 **Component:** Management Commitment

Reference No: EF10/2358 - 6
Subject / Title: General Policy Provisions
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

There is a lack of guidance information or policy in OM 1 regarding fatigue or rostering of inexperienced flight crew together.

Auditor Inits / Date: RD 07/05/10 **Component:** Management Commitment



Reference No: EF10/2358 - 7
Subject / Title: Provision of Alternates
System: 3 Flight Operations
Element: 3.2.01 Flight Planning & Dispatch

OM 1 Section 7.4.2.2 Operations Outside Australian Territories states in part:

Flight Planning Requirements for International Operations into Australia

For all flights from overseas ports to Australian ports an alternate must be nominated on the flight plan if within a period of 30 minutes prior, to 30 minutes after the scheduled ETA the following meteorological conditions occur at a destination aerodrome:

- Cloud base BKN or worse below 1500 ft or visibility below 5000 m.

Jetstar publishes a FSO that states alternate minima for each airport. However this FSO excludes reference to the above requirement. Consequently, the potential exists for flight crew operating under these circumstances to accidentally omit consideration of the above requirement when referring to this FSO.

Auditor Inits / Date: RD 07/05/10 **Component:** Data, Information & Records

Reference No: EF10/2358 - 8
Subject / Title: Use of Minimum Turnaround Times
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

When an aircraft is delayed, it is possible in the Sabre system for a minimum turn-around of 25 minutes to be scheduled to help in regaining flight schedule. This turn-around time is unachievable at some ports, such as Singapore. Consequently, this artificial turn-around time has the potential to adversely impact on the duty times of affected flight and cabin crew.

Auditor Inits / Date: RD 07/05/10 **Component:** Data, Information & Records



Reference No: EF10/2358 - 9
Subject / Title: Rostering of Standby
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

The Domestic and International Exemptions state that "the maximum allowable duty period following call out from standby is to be decreased by the number of hours that the standby time exceeds 12 hours." This clause is designed to preclude pilots from flying longer duties following longer standby periods. For instance, if a pilot was on a continuous standby for 14 hours then the pilot would have to reduce the max duty by 2 hours in accordance with the applicable exemption. For JQ 61/62 the scheduled duty time is 11.5 hours with a max duty permitted of 12 hours. However if the pilot was called off a 14 hour standby the maximum allowable duty is 10 hours (12-2 hours) which would preclude the pilot from operating JQ61/62 (scheduled 11.5 hr duty).

To meet the commercial imperatives, roster builds for April and May have included split standby periods in the Perth and Darwin base pilot rosters. The total time between the commencement of the first standby period and the cessation of the last standby period is up to 14 hours. However, there is 10 hours time free of duty between the first and second standby periods. It is arguable that some flight crew cannot be adequately rested for both standby periods and that the exemption is being applied too liberally, in order to meet commercial imperatives. Consequently, split standby periods may increase the risk of fatigue. For some flight crews, the splitting of standby will provide time free of duty but will not provide adequate rest. Therefore, for these flight crews the split duty would be equivalent to being rostered for a 14 hour standby when considering the adequacy of rest. Accordingly, to prevent fatigue, Jetstar should consider applying the above clause or not utilising split standby periods.

Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice



Reference No: EF10/2358 - 10
Subject / Title: Contacting Crew During Rest Periods
System: 6 Aircrew & Crew Flight, Rest & Duty Time
Element: 6.1.02 Flight Crew Member Flight / Duty / Rest Time

Jetstar EBA 2008 clause 23.3.4 states "Jetstar will not contact pilots rostered for a standby duty, during the required CAO rest periods immediately prior to that standby duty, except to meet urgent operational requirements (e.g. to avoid cancellation or delay of a flight). Acceptance of a duty will be at the discretion of the pilot called during this rest period."

If a pilot has completed a duty and is then on minimum time free of duty prior to a standby period then a call from a crewing officer pursuant to this clause would contravene the requirement that the operator provides opportunity for and the flight crew member has taken adequate rest. Furthermore, disturbing a pilot's rest may increase pressure on a pilot to accept the duty and operate to an adjusted schedule.

A call from crewing in the period prior to a duty may deprive the flight crew of the opportunity for adequate rest; regardless of whether the call is made prior to a standby period or a rostered duty. The introduction by Jetstar of adequate controls, including controls dependent on the time of day and length of duty, may help to reduce the likelihood of this occurring.

Auditor Inits / Date: RD 07/05/10 **Component:** Process in Practice

Reference No: EF10/2358 - 11
Subject / Title: Use of Pilots as Cabin Crew
System: 3 Flight Operations
Element: 3.1.02 Cabin Crew Duties / Cabin Procedures

The Jetstar operations manuals do not adequately preclude flight crew from acting as cabin crew in the event that cabin crew illness or injury prevents the continuation of their duty at an airport. Jetstar flight crew are currently not qualified to act in this capacity. However, a flight crew member was recently asked by Jetstar to act as a cabin crew member.

To prevent the likelihood of recurrence, Jetstar should consider amending the operations manual to address this issue.

Auditor Inits / Date: RD 07/05/10 **Component:** Data, Information & Records



Reference No: EF10/2358 - 12
Subject / Title: Cabin Crew - English Language Proficiency
System: 4 Personnel, Training & Qualifications
Element: 4.2.04 Training of Cabin Crew Members

The auditors had occasion to review the means by which Jetstar assesses and monitors the English language proficiency of cabin crew. The process for "off shore" cabin crew base recruitment was explained and supporting evidence provided. Ongoing performance checks for cabin crew were also explained. It was noted that there is little opportunity to assess ongoing safety briefing delivery in front of passengers during line performance checks. Relevant was that Jetstar conducts CAO 20.11 proficiency checks of cabin crew safety briefing delivery at annual emergency procedures training. Regarding the alleged deficiencies on the cited BNE/DRW flight, the matter was assessed as an isolated occurrence, which was followed up in a timely and responsible manner by Jetstar.

Operators generally should be aware of the strict liability that can apply for a breach of conditions of a CAR (1988) 208 Directions under CAR (1988) 215(3A). This provision supports conformance with operations manual instructions relevant to reduced cabin crew operations.

Auditor Inits / Date: GH 10/05/10 **Component:** Process in Practice