



# 交通部民用航空局 民航通告

主旨：法規符合陳述文件之編訂指引

## Preparation of Acceptable Letter of Compliance

發行日期：2023.11.01

編號：AC 00-004C

發行單位：飛航標準組

### 一、目的 Purpose：

本局為協助相關業者或機構，申請辦理「航空產品與其各項裝備及零組件維修廠」、「航空人員訓練機構」、「民用航空運輸業」或「普通航空業」檢定證書或許可證時，能依據本局相關檢定作業程序編訂「法規符合陳述文件」，特此函頒本通告。

This Advisory Circular (AC) provides guidance for acceptable completion of the Letter(s) of Compliance (LOC) that are required for certification of organizations seeking approval as an—

- Repair Station Certificate
- Civil Aviation Training Institution Certificate
- Air Operator Certificate (AOC)

### 二、修正說明 Status of this AC：

本次更新本局之局徽及英文名稱、修正部分誤植字、新增相關文件參照，並取代 112 年 5 月 15 日 AC 00-004B。

This AC has updated the logo and English name of CAA Taiwan, corrected some typos, added some references of documents, and will replace AC 00-004B issued on May 15, 2023.

### 三、背景說明 Background：

鑑於民用航空法第 23 之 2、27、48 及 64 條，申請籌設「航空產品

與其各項裝備及零組件維修廠」、「航空人員訓練機構」、「民用航空運輸業者」或「普通航空業者」，需具有依相關法規從事安全營運之能力，並經本局完成審查合格，由本局發給相關檢定證書或許可證始得營業。為使相關業者於申請書證時，能有適切之參考，本局函頒本通告，提供業者「法規符合陳述文件」之編訂指引，以供業者證明其公司手冊系統內的政策與程序符合所有相關法規，並供本局審查其法規符合性。

An organization seeking approval by the CAA Taiwan (CAAT) will be required to demonstrate conformance with Taiwan legislation and regulations during the certification. A proven method of demonstrating conformance is the submission of a LOC listing each Section and subparagraph and how the applicant will comply with those regulations.

This AC has been developed to assist these organizations to demonstrate their conformance with Taiwan aviation regulations by referencing, using a standardized presentation, where the regulatory requirements are found as policy and procedure in the company manual system.

The CAAT will use the LOC submitted by the organization seeking approval as a key reference document to review the organization's manual system to confirm that all applicable regulatory requirements are included.

#### **四、需求說明 Applicability：**

「航空產品與其各項裝備及零組件維修廠」、「航空人員訓練機構」、「民用航空運輸業者」及「普通航空業者」之申請者，應參照本通告編訂「法規符合陳述文件」，以供本局於檢定作業期間進行審查。

This AC is for use by applicants that plan to, or conduct, air transport or general aviation operations under a Taiwan Air Operator's certificate, or submit an application for certification as an Aviation Training Institution, Maintenance Organization or Repair Stations under TCAR(s)—

- 1) 03-01A as a Civil Air Transport Enterprise;
- 2) 03-03A as a General Aviation Enterprise;
- 3) 05-02 A as a Civil Aviation Training Institution (CATI);
- 4) 06-02A as a repair station or maintenance organization.

#### **五、執行要點說明 Description：**

- (一) 有關「民用航空運輸業者」或「普通航空業者」之申請，本通告參照本局「航空運輸許可證檢定與管理手冊 (AOC Certification and Administration Manual)」及民航通告 AC 00-003 航空業許可證檢定作業程序。

With regard to AOC Certification, this AC refers to the AOC Certification and Administration Manual (Code: CAAT-004-FSD) issued by CAA Taiwan and Advisory Circular AC 00-003 Process & Application: Air Operator Certificate Certification.

- (二) 有關「航空人員訓練機構」之申請，本通告參照本局「訓練機構管理手冊 (Training Organization Administration Manual)」。

With regard to CATI Certification, this AC refers to the Training Organization Administration Manual (Code: CAAT-009-FSD).

- (三) 有關「維修廠」之申請，本通告參照本局「適航檢查員手冊」(Airworthiness Inspector Manual)」第 3 冊「維修廠管理」。

With regard to Repair Station Certification, this AC refers to the Airworthiness Inspector Manual Volume 3 Repair Station Administration (Code: CAAT-011-FSD).

- (四) 詳細執行要點請參考本通告附件。

For details of the Preparation of Acceptable Letter(s) of Compliance, see AC 00-004C Attachment.

- (五) 本通告相當於作業指導，無法規之強制性，其提供之做法非唯一，但為本局可接受之方法；其作用主要在提供說明資料，以解釋特定法規，希業者善加利用。

Advisory Circulars are intended to provide advice and guidance to

illustrate a means, but not necessarily the only means, of complying with the Regulations, or to explain certain regulatory requirements by providing informative, interpretative and explanatory material.

#### **六、相關規定及參考文件 Related Reading Material :**

- (一) ICAO Doc 8335. Manual of Procedures for Operations Inspection, Certification and Continued Surveillance
- (二) 民用航空法及相關子法。  
Taiwan Civil Aviation Regulations (TCARs).
- (三) 航空運輸許可證檢定與管理手冊 (CAAT-004-FSD)  
AOC Certification and Administration Manual.
- (四) 民航通告 AC 00-003 航空業許可證檢定作業程序。  
AC 00-003 Process & Application: Air Operator Certificate Certification.
- (五) 訓練機構管理手冊 (CAAT-009-FSD)  
Training Organization Administration Manual.
- (六) 適航檢查員手冊第 3 冊維修廠管理 (CAAT-011-FSD)  
Airworthiness Inspector Manual Volume 3 Repair Station Administration.

簽署 Signed by : 王富民

飛航標準組組長王富民  
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## Section 2 GENERAL INFORMATION

### 2.1 PRIMARY METHOD

A. The Letter(s) of Compliance (LOC) are the primary method used by the Civil Aviation Administration of Taiwan (CAAT) to ensuring that the applicant has—

- 1) Considered all safety regulations applicable to its operations; and
- 2) Established policy and procedures for conformance of its personnel with those requirements.

- The applicant should ensure that these documents are as accurate as possible.
- It is important to be meticulous in the development and cross-referencing of these documents with the manual system.

B. These are the most critical documents in the certification process.

### 2.2 APPLICANT COMPLETION OF LETTER(S) OF COMPLIANCE

The applicant should complete the LOC as its personnel are putting together its system of policies and procedures for operations and maintenance to ensure that the proper safety standards have been addressed.

- Past experience has found that most applicants will wait until they believe that they have a complete system developed and ready for submission.
- In the rush to complete the formal application, the applicant's personnel tend to view the completion of the LOC as an inconvenience or a slight to their vast knowledge and experience.
- The result is that they will not usually take the time to fully consider the requirements and implications of specific regulations in the rush to complete the document for submission.

The applicant should complete the LOC at the beginning of the development of the manuals and formal application package.

### 2.3 AVAILABLE LETTER(S) OF COMPLIANCE

A. The following Letters of Compliance are available for applicants if applicable:

- 1) Letter of Compliance (01-01A 民用航空法)\_CAAT Form LOC-01-01A
- 2) Letter of Compliance (03-23A 民用航空保安全管理辦法)\_CAAT Form LOC-03-23A
- 3) Letter of Compliance (03-24A 危險物品空運管理辦法)\_CAAT Form LOC-03-24A
- 4) Letter of Compliance (05-01A 航空人員檢定給證管理規則)\_CAAT Form LOC-05-01A



- 5) Letter of Compliance (05-02A 民用航空人員訓練機構管理規則)\_CAAT Form LOC-05-02A
- 6) Letter of Compliance (05-05A 航空人員術科檢定委託辦法)\_CAAT Form LOC-05-05A
- 7) Letter of Compliance (06-01A 航空產品與其各項裝備及零組件適航維修管理規則)\_CAAT Form LOC-06-01A
- 8) Letter of Compliance (06-02A 航空產品與其各項裝備及零組件維修廠設立檢定管理規則)\_CAAT Form LOC-06-02A
- 9) Letter of Compliance (06-03A 航空器檢查委託辦法)\_CAAT Form LOC-06-03A
- 10) Letter of Compliance (06-06A 航空產品與其各項裝備及零組件檢定委託辦法)\_CAAT Form LOC-06-06A
- 11) Letter of Compliance (06-07A 航空產品與其各項裝備及零組件適航檢定管理規則)\_Form LOC-06-07A
- 12) Letter of Compliance (06-08A 飛航模擬訓練設備檢定管理規則)\_CAAT Form LOC-06-08A
- 13) Letter of Compliance (07-02A 航空器飛航作業管理規則)\_CAAT Form LOC-07-02A
- 14) Letter of Compliance (08-01A 航空器飛航安全相關事件處理規則)\_CAAT Form LOC-08-01A
- 15) Letter of Compliance (09-01A 飛航規則)\_CAAT Form LOC-09-01A

**B. Requirements:**

- Required for AOC:
  - ◆ Act 01-01A, TCAR 07-02A, 09-01A (regarding Operations of Aircraft)
  - ◆ TCAR 06-07A, 07-02A (regarding Required Instruments & Equipment)
  - ◆ TCAR 05-01A (regarding Personnel Licensing)
  - ◆ TCAR 05-05A, 06-03A & 06-06A (regarding CAAT Designated Representative)
  - ◆ TCAR 03-24A (regarding Dangerous Goods)
  - ◆ TCAR 03-23A (regarding Security)
  - ◆ TCAR 08-01A (regarding flight safety related events investigation)
- Required for Repair Station
  - ◆ TCAR 06-01A, 06-02A, 06-06A and 06-07A (regarding Repair Station)
- Required for Civil Aviation Training Institution (CATI)
  - ◆ TCAR 05-02A & 06-08A (regarding CATI, flight training devices)

- C. During the Pre- Application meeting, the CAAT Flight Standards Division (FSD) will provide the applicants with a MS Word copy of the applicable blank LOC. The CAAT will discuss the required process and requirements. The applicant might need to check



for the most updated TCARs to use in the LOC.

## 2.4 DEFINITIONS & ACRONYMS

A. The following definitions are used in this advisory circular—

- 1) **Letter(s) of Compliance.** A checklist to be prepared by an applicant to demonstrate awareness of and compliance with the applicable regulations for their proposed functions and operations in aviation.
  - ◆ Similar checklists used by mature aviation oversight organizations are referred to as “compliance statements,” “Regulations Compliance Checklists,” “conformance reports,” etc., but all of these documents perform the same function during the certification process.
- 2) **Repository Paragraphs.** A term used to describe paragraphs that tend to have more than 10 lines and contain long unbroken discussions.

B. The following acronyms are used in this advisory circular—

- 1) **AC** – Advisory Circular
- 2) **AOC** – Air Operator Certificate
- 3) **CAAT** – Civil Aviation Administration of Taiwan
- 4) **CATI** – Civil Aviation Training Institution
- 5) **CPC** – Certification Project Coordinator
- 6) **FAC** – Formal Application Checklist
- 7) **FSD** – Flight Standards Division
- 8) **PASI** – Pre-Application Statement of Intent
- 9) **SRR** – Specific Regulatory Requirement
- 10) **TCAR** – Taiwan Civil Aviation Regulation(s)

## Section 3 INSTRUCTIONS FOR COMPLETION

The following guidance prescribes the general instructions for use and completion of the LOC.

### 3.1 GENERAL CONCEPT

- A. The applicant is required to submit the applicable LOC as an official record with the formal application package.
- The LOC serves as a checklist for the applicant to ensure that their policies and procedures conform to all regulations applicable to their proposed operations.

The LOC also serves a primary checklist for the CAAT to ensure that the applicant is in conformance with the applicable regulation before issuance of related approvals.





- B. Properly completed and accurate, the LOC serves as a primary record of the applicant's implementation of the applicable regulations.
- This document will be the primary record of applicant conformance and implementation of the applicable regulations. This document must be completely correct in order for the CAAT to issue the appropriate approval, authorization or certificate that is the goal of the specific certification process.
- C. Full conformance with the applicable Sections of the TCAR is required before completion of the certification process.
- The applicant's LOC must address all requirements at a sub-paragraph level (see examples). No requirement of the applicable regulation may be deleted or left out of the document.
- D. The LOC is submitted to the CAAT as a required attachment to the formal application package.
- Each LOC required for a particular certification must be submitted with the original formal application.
- Failure to submit the applicable LOC will result in the immediate return of the formal application.
- E. This document, when audited by the CAAT, becomes one of the official records that the applicant was certificated in compliance with international safety standards. It provides the most efficient means of ensuring conformance with the required regulations both in the—
- Preparation of the applicant's manual system; and
  - Subsequent conformance review by the CAAT.

### 3.2 PROVIDING REGULATION REFERENCES

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- A. Each LOC has 6 columns.
- **Column 1** - The specific TCAR requirement SRR, Article or Section number is already listed.
  - **Column 2** - The specific TCAR text is included for reference.
  - **Column 3** - The AOC holder will insert the company manual page/paragraph meeting this requirement.
  - **Column 4** - The AOC holder may insert comments on their methods of meeting the requirement or why it is not applicable to their operation.



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- **Column 5** - The CAAT inspector will enter the current evaluation status of this requirement.

*NO=Operator answer not acceptable, YES = Operator answer is acceptable,*  
Leaving the status blank = not evaluated.

- **Column 6** - The CAAT inspectors making the evaluation will insert their initials and dates in Column 6. If the evaluation result is satisfactory, the date will be entered under the inspector initials.

(1)	(2)	(3)	(4)	(5)	(6)
編號 Article	條文內容 Text	公司手冊參照 Company Manual Reference	公司陳述 Applicant Comments	情況 Status	審查結果 Inspector/Date

- B. The two left columns contain the Specific Regulatory Reference (SRR) or Article and the associated text of the regulation requirement to enable the applicant to orient to each specific requirement.

- 1) From the left, the first column “(1) Article” will contain the specific regulatory requirement (SRR) by separating each subpart, section, paragraph and sub-paragraph to ensure detailed map of compliance with the applicable regulations before certification.
- 2) The second column “(2) Text” will provide the specific text of the requirement.
  - ◆ The text of a regulation requirement may be separated into 2 or more rows when additional requirements are embedded in the text. This ensures that all requirements have been addressed.
  - ◆ Headers that appear in regulations, such as Subpart and regulation headers, are provided as they appear in the regulations.

- C. The two center columns are used by the applicant to indicate to the CAAT how they will comply with the specific regulatory requirement by either—

- 1) Entering a reference from the manuals and documents submitted in the “(3) Company Manual Reference” column;
- 2) Entering an explanation in the “(4) Applicant Comments” regarding the compliance or why compliance is not required.
  - ◆ Where the CAAT finds the applicant reference unacceptable - they may insert a comment regarding the reason it is unacceptable in this column.



- D. The two right columns are reserved for the reviewing CAAT inspectors to indicate the status of the CAAT review.
- 1) The “(5) Status” column is used by the CAAT to indicate YES (=Accepted) or NO (=Not Accepted).
  - 2) The “(6) Inspector/ Date” column is used by the CAAT to insert the initials of the accepting inspector and the date of acceptance.

## Section 4 MANUAL REFERENCES ARE THE BEST

### 4.1 EXAMPLE OF MANUAL REFERENCES

- A. When possible, the applicant should provide a reference from his policy and procedure manuals.

(1) Article	(2) Text	(3) Company Manual Reference
第一百零六條	配置客艙組員之載客航空器，應配備乾電池供電之手電筒，並置於客艙組員座椅周邊便於取用之處。	FOM 5.1.3 (d) CCM 5.6 (a) GMM 6.7 (c)

- B. In the example above, the applicant provides following references to demonstrate compliance with the Article.

- Flight Operations Manual, Paragraph 5.1.3 (d)
- Cabin Crew Manual Paragraph 5.6(a)
- General Maintenance Manual Paragraph 6.7(c)

- C. This example also demonstrates that the applicant is probably has implemented the Flight Safety Documents system because the applicable regulatory policy appears in 3 different manuals.

The CAAT will check these LOC manual references for—

- the correct regulatory policy; and
- ensure that the applicant’s policies and procedures for this Article do not conflict between manuals.

### 4.2 CORRESPONDING SRR CITES

- A. The applicant should ensure that it is possible for the reviewing CAAT inspector to find those references in the applicant’s manuals system.

- B. This is accomplished by inserting SRR citations in the manuals.

Including the SRR cites in the manuals simplifies the—

- Development of a LOC, and
- The CAAT review.

#### 4.2.1 EXAMPLE REFERENCE AT THE BEGINNING OF PARAGRAPH

- A. The following is an example of a SRR cite in a manual at the beginning of the applicable paragraph.
- B. This method is recommended, but other methods (if accurate) will be acceptable.



**6.5.1 EXCEEDING FLIGHT TIME**

Reference: TCAR 07-02A Article XXX

A flight crew member may exceed the minimum flight time limitations in “unforeseen” operational circumstances that arise after takeoff that are beyond the control of Anywhere Airlines.

The flight crew member may exceed the maximum and cumulative flight time specified in Paragraph 6.4 to the extent necessary to safely land the aircraft at the next destination airport or alternative, as appropriate.

**4.2.2 EXAMPLE REFERENCE INSIDE OF THE PARAGRAPH**

**6.5.1 EXCEEDING FLIGHT TIME**

A flight crew member may exceed the minimum flight time limitations in “unforeseen” operational circumstances that arise after takeoff that are beyond the control of Anywhere Airlines.

The flight crew member may exceed the maximum and cumulative flight time specified in Paragraph 6.4 to the extent necessary to safely land the aircraft at the next destination airport or alternative, as appropriate. (TCAR 07-02A Article XXX)

The following is an example of a SRR cite within the applicable paragraph.

**4.2.3 EXAMPLE REFERENCE IN THE TITLE**

A. The following is an example of an SRR cite in the title—

**6.5.1 EXCEEDING FLIGHT TIME (TCAR 07-02A Article XXX)**

A flight crew member may exceed the minimum flight time limitations in “unforeseen” operational circumstances that arise after takeoff that are beyond the control of Anywhere Airlines.

The flight crew member may exceed the maximum and cumulative flight time specified in Paragraph 6.4 to the extent necessary to safely land the aircraft at the next destination airport or alternative, as appropriate.

B. The regulation reference cite may be on the same line as the title or located directly below it.

**4.3 SUGGESTED MANUAL ACRONYMS**

- A. The use of acronyms in the “Manual Reference” column of the LOC is recommended, provided those acronyms are defined and consistent.
- B. Specific acronyms may be developed by the applicant, but must be defined in the applicant’s application.

**4.3.1 OPERATIONS ACRONYMS**

Examples of possible operations acronyms include—

- FOM – Flight Operations Manual
- GOM – General Operations Manual
- OMA – Operations Manual, Part A
- CCM – Cabin Crew Manual
- DPH – Dispatch Procedures Manual

Undefined or obscure acronyms will be unacceptable.



- CSM – Crew Scheduling Manual
- SOM – Station Operations Manual
- FOTM – Flight Operations Training Manual
- OMD – Operations Manual, Part D
- RTG – Route Guide
- OMC – Operations Manual, Part C
- TPM – Training & Procedures Manual
- DIM – Deicing Program Manual
- WOM — Winter Operations Manual

#### **4.3.2 AIRWORTHINESS ACRONYMS**

Examples of possible airworthiness acronyms include—

- GMM – General Maintenance Manual
- MCM – Maintenance Control Manual
- MOPM – Maintenance Organization Procedures Manual
- MTM – Maintenance Training Manual

#### **4.3.3 AIRCRAFT TYPE-SPECIFIC ACRONYMS**

Examples of acronyms associated with aircraft type-specific manuals and documents—

- AFM – Aircraft Flight Manual
- OMB – Operations Manual, Part B
- SOP – Standard Operating Procedures
- CCC – Condensed Cockpit Checklists
- QRH – Quick Reference Handbook
- ACS – Aircraft Systems
- ACP – Aircraft Performance
- MEL – Minimum Equipment List
- MBM – Mass & Balance Manual
- MP – Maintenance Program
- JTC – Job Task Cards
- PBC – Passenger Briefing Card



#### 4.4 PAGE VS PARAGRAPH NUMBERING

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- A. Numbering of the chapters and paragraphs within a manual system is important. As much as practical, the manuals should be consistently numbering throughout the system.
- B. The applicant should carefully consider the use of consistent paragraph numbering in their manual system.
- C. Paragraph numbering—
- 1) Is important in a flight safety documents system; and
  - 2) Provides for user-friendly access to the contents.
- D. Having an inconsistent numbering system from manual to manual within a company manual system makes it difficult for the—
- 1) Users to access and use these aviation safety manuals; and
  - 2) CAAT to review and determine that the manual system is acceptable.

- A LOC is generally better referenced when the manual system has consistently numbering.
- As much as possible, the LOC should direct the user to the specific paragraph(s) where the SRR is embedded in the text.

### Section 5 ORGANIZATION COMMENT ENTRIES

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- A. The applicant should include a comment in the “(4) Applicant Comments” column when the SRR is—
- 1) Applicable, but no manual reference is provided, or
  - 2) Determined to be not applicable to the applicant.
- B. For maximum clarity, a comment in the “(4) Applicant Comments” when the SRR is applicable, but the organization is requesting an exemption, waiver or special approvals.



## 5.1 APPLYING FOR EXEMPTION, DEVIATION OR WAIVER

Where an exemption, deviation or waiver to an SRR is being requested, the applicant should—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
30	The operator shall track the position of an aeroplane at least every 15 minutes for the portion(s) of the inflight operations(s) that is planned in an oceanic area(s) or a remote area(s) under the following conditions.	<b>Exemption FOM 18.5(b) DPM 14.7(a)</b>	<b>XXX Airlines will file for an exemption to this requirement until July 2018 pending obtaining the necessary equipment.</b>

- 1) Insert the manual references which outline the proposed alternative requirements to the SRR;
- 2) Insert an explanation in the “(4) Applicant Comments” column advising that the alternative requirement is requested; and
- 3) Where the applicant desires, a different font or shading may be used to emphasize manual references or comment.

## 5.2 APPLYING FOR SPECIAL APPROVAL

Where the CAAT will be expected to conduct a special review, such as a requests for computer record keeping as the primary method of record keeping, the applicant should—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
21	An operator shall establish respective training programmes for personnel of different areas in operations which will be carried into effect after approval by CAA. The programmes in the preceding paragraph shall include a CRM programme to ensure that all operations personnel are properly instructed in their particular duties and responsibilities and the relationship of such duties to the operation as a whole.	<b>FOM 18.5(b) CCM 12.4 DPM 14.7(a) FOTM 3.0</b>	<b>XXX Airlines is applying to use the electronic Crew Training Record Track software as the primary method of recording and tracking crew training and qualifications.</b>



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	An operator shall establish a system to keep all training records for CAA's inspection.		
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- 1) Insert the manual references which outline the proposed special methodology to meet the SRR;
- 2) Insert an explanation in the “(4) Applicant Comments” column advising that the proposed is requested; and
- 3) Where the applicant desires, they may change the font or background color in those two cells to emphasize the request.

The alternative methodology must be clearly outline in the applicant's policies and procedures.

### 5.3 DECISION REGARDING PERMISSIVE REQUIREMENT

- A. There are “permissive” requirements included in the regulations. The applicant should describe their intentions regarding these types of regulations.

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
73	For Aircraft operating in domestic flights, due to short flight legs or limited refuelling facilities in aerodromes, an operator may use CAA approved simplified operational flight plans for flight operations. However, the fuel carried shall be in accordance with those prescribed in Article 66 through Article 72.	NA	<b>XXX Airlines is aware of this permissive requirement but does not plan to use this capability.</b>

- B. If the decision is not to take advantage of the permissive requirement, the applicant should—

- 1) Insert an “NA” in the “(3) Company Manual Reference” column; and
- 2) Insert a statement in the “(4) Applicant Comments” column indicating that this provision will not be requested by the applicant.
- 3) If the decision is made to take advantage of a permissive requirement, the applicant should complete the SRR in the LOC as outlined in paragraph 5.2 of this AC.





## 5.4 REGULATION NOT APPLICABLE

Where an SRR is not applicable to the organization, that fact should be annotated in the LOC in the following manner—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
86	Performance class 1 and class 2 helicopters may be operated to and from elevated heliports or helidecks. Only class 1 helicopter may be operated to and from elevated heliports in congested area.	NA	XXX Airlines does not plan to operate helicopters.

- 1) Insert an “NA” in the “(3) Company Manual Reference” column; and
- 2) Insert a statement in the “(4) Applicant Comments” column explaining the reason that SRR is not applicable; and
- 3) Where the applicant desires, they may change the background color in the table row to gray.

The color change will allow the CAAT to quickly review the “not applicable” answers for accuracy.

## 5.5 A-1 = ACKNOWLEDGMENT OF APPLICABILITY REQUIRED

Where the SRR outlines the applicability of the requirement, the applicant is expected to acknowledge that applicability to their operations by—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
1	This Regulations are prescribed in accordance with Article 43-IV of the Civil Aviation Act (hereinafter referred to as the “Act”)	A-1	This TCAR applies to all operations of XXX Airlines.
2	In carrying out the transport of dangerous goods by air, the shipper, owner or operator of an aircraft, air freight forwarder, airport ground handling service, catering service and air cargo entrepot shall follow the provisions of this Regulations and the Technical Instructions for the Safe Transport of Dangerous	A-1	This TCAR applies to all operations of XXX Airlines. -or- XXX Airlines and its personnel are subject to the requirements of TCAR 03-24A.



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	Goods by Air issued by the International Civil Aviation Organization (hereinafter referred to as the “Technical Instructions”) as adopted by the Civil Aviation Administration, Ministry of Transportation and Communications (hereinafter referred to as the “CAA”) pursuant to Article 43-IV of the Act.		
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- 1) Inserting “A-1” in the “(3) Company Manual Reference” column (this indicates to the CAAT that the applicant is aware of the applicability); and/or
- 2) The applicant may also insert an acknowledgment statement in the “(4) Applicant Comments” column, such as “...XXX Airlines and its personnel are subject to the requirements of TCAR XX-XXX.”

## 5.6 A-2 = ACKNOWLEDGMENT OF AN APPLICANT RESPONSIBILITY

Some SRRs provide specific information that is not necessary to include within the manual system, but should be acknowledged by the applicant. The following provides the method for that type of acknowledgment—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
13	Before a general aviation enterprise terminates its operations, advance notice must be served to MOTC through CAA. Within 30 days from the terminations, it should surrender the issued permit and Air Operator Certificate for cancellation. If the permit and Air Operator Certificate has not been surrendered within the 30-day period, CAA will issue a public notice advising that the permit and Air Operator Certificate has been revoked.	A-2	<b>XXX Airlines management understands they must serve the advance notice within 30 days from the terminations.</b>

- 1) Insert “A-2” in the “(3) Company Manual Reference” column; and/or



- 2) The applicant may also insert an acknowledgment statement in the “(4) Applicant Comments” column, such as “...XXX Airlines understands that they must propose an amendment to the AOC operations specifications at least 30 days prior to the intended date of any operation under the amendment.”

## 5.7 A-3 = ACKNOWLEDGMENT OF A REQUIRED CAAT ACTION

For those requirements which state that an action by the Authority is necessary, such as “approval,” “acceptance” or “issue,” the applicant’s answer must show that this requirement is reserved as an action responsibility of the Authority.

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
8-1	CAA may designate the airport operator to perform the inspection of an operator documents on its aircraft as required in accordance with Article 38 of the Act, Articles 109 and 244 of the Aircraft Flight Operation Regulations.  When the above aforementioned tests are designated by CAA in accordance with the preceding paragraph, the name of the designee, the commissioned items and regulations shall be promulgated on the government bulletin.	A-3	XXX Airlines management understands that this is a requirement reserved for the action of the Authority.

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
26	CAA shall conduct periodical physical examinations of aircraft pilots, flight engineer and air traffic controller as well as temporary checks. Those meeting the standard will be issued a medical certificate which should be carried with the person in performing his or her duties. Those who fail to pass the physical examination shall be	A-3 FOM 4.8 (f)	XXX Airlines management understands that the Authority will conduct physical examinations on pilot.



	suspended from duty.		
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- 1) Insert “A-3” in the “(3) Company Manual Reference” column; and/or
- 2) The applicant may also insert an acknowledgment statement in the “(4) Applicant Comments” column, such as “...Anywhere Airlines management understands that this is a requirement reserved for the action of the Authority.”

## 5.8 NR-PEL = REQUIRED FOR LICENSE KNOWLEDGE & SKILL TEST

- A. Some regulations require knowledge that is basic to the holder of a PEL license. If it is clear that the employees, as holders of PEL licenses, should be aware of the requirement, it may not be necessary for that information to be included in the organization’s manual system.
- B. In most cases, this will be obvious, such as a basic airworthiness or operations requirement that applies to the PEL license holders involved, such as—

(1) Article	(2) Text	(3) Company Manual Reference	(4) Applicant Comments
34	Subject to the provisions of Article 42, all changes to a flight plan submitted for an IFR flight, or a VFR flight operated as a controlled flight, shall be reported as soon as practicable to the appropriate ATS unit. For other VFR flights, significant changes to a flight plan shall be reported as soon as practicable to the appropriate air traffic services unit.	NR-PEL	<b>This SRR is basic knowledge required for original qualification of the PEL license holders involved.</b>



C. For these SRRs—

- 1) Insert an “NR-PEL” in the “(3) Company Manual Reference” column; and
- 2) The applicant may also insert a statement in the “(4) Applicant Comments” column explaining that the SRR is basic knowledge for the PEL license holder involved; and

Example above reads: “...This SRR is basic knowledge required for original qualification of the PEL license holders involved.”

- D. In individual cases, however, the CAAT may determine that some requirements, designated by the applicant as basic knowledge that should be known by the PEL license holder, must be included in the manual system. This decision will necessitate revision of the document to conform.

The applicant should consider meeting with the CPM early in the process of developing the compliance checklists to discuss the SRRs that may to possible to treat as prescribed in this paragraph.

## 5.9 SPECIAL CITES: AIRCRAFT INSTRUMENTS & EQUIPMENT

- A. Normally manual references provided in LOC are provided by paragraph number. (Page number will be acceptable where there is a bold header on the page which indicates the proper subject or the specific regulatory reference cites are properly located.)
- B. TCAR regarding Instruments & Equipment requires manual reference cites that can be taken from the—
- 1) Minimum Equipment Lists ATA numbers—where these numbers show numbers installed (preferred method)
  - 2) Aircraft Equipment List—by page and paragraph number
  - 3) Operations manual—by page and/or paragraph number

## 5.10 REGULATION COMPLIANCE CHECKLIST EDITORIAL ISSUES

- A. When a LOC is started, immediately insert the official business name of the applicant.

Letter of Compliance					
法規名稱	民用航空法 Act 01-01A	法規生效日	04/25/2018		
組織名稱	(Insert Organization Name)	文件版本與日期	REV.01, Date MM/DD/YYYY		
編號 Article	條文內容 Text	公司手冊參照 Company Manual Reference	公司陳述 Applicant Comments	情況 Status	審查結果 Inspector/Date
第一章	總則				

- B. Then insert the revision number (Original =00) and the date.

Letter of Compliance					
法規名稱	民用航空法 Act 01-01A	法規生效日	04/25/2018		
組織名稱	(Insert Organization Name)	文件版本與日期	REV.01, Date MM/DD/YYYY		
編號 Article	條文內容 Text	公司手冊參照 Company Manual Reference	公司陳述 Applicant Comments	情況 Status	審查結果 Inspector/Date
第一章	總則				



- C. When the CAAT returns the WORD copy of the LOC to applicant for corrections, they will have indicated the need for corrections and, in most situations, the reason the applicant's answer was not satisfactory.
- 1) Status = NO indicates the need for revision.
  - 2) Comments = CAAT comments will use a font different from that used by the applicant to ensure that these comments are noted by the applicant's personnel.
- D. The first action the applicant should take is to SAVE the WORD file as the next revision number, then change the revision number and date.
- E. Now the applicant should revise the new LOC file and the associated company manuals to complete the corrections recommended by the CAAT.
- F. Continue the same format for subsequent revisions requested by the CAAT.

- The applicant should not change the CAAT "NO" status column.
- The CAAT will review the SRR revisions related to the previous "NO" decision.

## Section 6 CAAT REVIEW

### 6.1 COMPLETELY ACCURATE CROSS-REFERENCES

- A. The goal is to have a completely accurate cross-reference of the SRRs that provides the applicant's—
- 1) Manual system primary references for the applicable SRRs;
  - 2) Acknowledgments of applicability;
  - 3) Acknowledgment of responsibility;
  - 4) Alternate proposals for exemptions and/or deviations; and
  - 5) Special approval requirements.
- B. These LOC, when completely accurate, are included in a Completed Certification Report that is retained by the CAAT to demonstrate that the applicant was in compliance with the applicable SRRs when they were issued the certificate of approval.



## 6.2 REJECTED & REVISED LETTER(S) OF COMPLIANCE

- A. The submitted LOC will be audited for compliance with each SRR.
- B. Submitted LOC that have inaccurate or insufficient references will be returned to the applicant and the conformance review will be terminated.
- C. When the revised LOC, and supporting manual revisions are re-submitted, the conformance review will begin again.
- D. The LOC will remain “In-Work” throughout the document evaluation phase.
- E. Throughout the certification process, with emphasis on the document evaluation phase, these letters of compliance will ensure that, when the certification process is completed, the applicant and its manual system are in conformance with the applicable TCARs.

The CAAT document conformance review will not be conducted in the absence of accurate LOC that correctly cross-references the applicant’s manual system.

## 6.3 GENERAL CAAT APPROACH

- A. Assuming the applicant submitted a complete package of LOC and documents, the certification team will use the following methodology—
  - 1) As early as possible in the document conformance phase, all of the regulatory LOC will be evaluated in detail to ensure that the applicant’s manual references and comments are correct.
  - 2) If not, these documents will be rejected and returned to the applicant. At this point the document conformance phase (and entire certification process) will be suspended pending the necessary revisions by the applicant.
  - 3) The remainder of the document conformance phase cannot be accomplished in a timely manner until the manual system is determined to be in conformance with the applicable regulations.
  - 4) After the LOC references and comments are found to be acceptable, the CAAT will continue to be alert for potential changes to the references as addition revisions to the affected manuals are necessary.
- B. The LOC are only considered to be acceptable as in-final for inclusion in the CAAT certification file after all manual revisions required in the document conformance phase have been finalized as acceptable.

The CAAT will not complete the document evaluation phase until the letters of compliance are not correct!



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### **6.4 FILING OF EACH SUBMITTED LETTERS OF COMPLIANCE**

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- A. The CAAT will retain a digital file copy of each LOC that is submitted by the applicant, including those which are returned for revision.
- B. The copy that is accepted by the CAAT as an accurate and final copy will be retained a special certification “book” with a cover page prepared by the applicant as evidence to international aviation authorities that the applicant completed a complete certification under the applicable aviation regulations.

At all points in the certification process where the compliance checklists is rejected or found to be fully acceptable, a copy will be printed as a PDF file and retained in the certification records.

~ End of Advisory Circular ~