

ANNEX C

MOS comparison and review for a combined task specialist, incendiary dropping and external load operation

C1. Summary

This annex outlines the relevant section of the Part 138 MOS for an operator conducting a mixture of aerial work operations. Specifically, an operator that conducts task specialist R22 mustering, dispensing Bell 206 incendiary dropping and Bell B206 / AS350B3 class B external load day VFR operations (including firebombing). Operations are not conducted over populous areas.

Approximately 40 pages of the Part 138 MOS are relevant to this sample operation. Of these 40 pages, only 11 pages represent new material.

The next section of this Annex outlines the specific elements of the Part 138 MOS that apply to this mixture of operations. A breakdown of the requirements is listed below.

- a. Unchanged from current rules (5 pages):
 - i. 3 pages are operations manual content (similar to CAAP 215).
 - ii. 1 page empowers the fatigue rules in CAO 48.1.
 - iii. 1 page discusses flight manual compliance.
- b. Modified compared to current rules (6 pages):
 - i. 2 pages (1 of which is necessary legal phraseology) are performance
 - ii. 3 pages are external load rules broadly the same as current rules.
 - iii. 1 page are dispensing rules broadly the same as the current dropping rules.
- c. Incorporating current exemptions and permissions (3 pages):
 - i. 2 page – exceptions to Part 91 seatbelt rules.
 - ii. 1 page – exceptions to Part 91 minimum height rules.
- d. Definitions (15 pages) – only a small number of which apply to this sample operation.
- e. New material (11 pages):
 - i. 4 pages – flight crew training and checking provisions designed to provide greater flexibility and clarity to industry.
 - ii. 2 pages – aerial work passenger rules (entirely new capability for aerial work).
 - iii. 3 pages – risk assessments and aerial work zones (enables new outcome-based rules).
 - iv. 2 pages – task specialist training and checking provisions designed to provide greater flexibility and clarity to industry.

It should be noted that if the operator has appropriate procedures in the operations manual then the B206 and AS350 could also be used for aerial fire mapping or survey operations with task specialist crew members carried for this purpose. This would not result in any additional MOS requirements.

C2. Applicable chapters and sections of the 138 MOS

This table outlines the precise elements of the Part 138 MOS that would be relevant to this combination of aerial work operations.

Chapters	Sections	Subsections or paragraphs	Number of applicable MOS pages
1 - Preliminary and definitions	1.03 1.04 1.05	All	14 (Note: this page count assumes all definitions in Division 2 are utilised by the operator whereas many definitions will not apply)
Chapter 2 Aerial work passengers	2.01	All except 2.01(3)(a)	2
Chapter 3 More definitions	3.01 3.02	All	1
Chapter 6 Fatigue (points to the CAO)	6.01	All	1
Chapter 7 Operations manual content	7.01 7.02 7.03	All	3
Chapter 8 Flight manual compliance	8.01	All	1
Chapter 9 Exceptions to Part 91 minimum height rules	9.01 9.02 9.23	All	2
Chapter 13 Risk assessments and aerial work zones	13.01 13.02 13.04	All	3
Chapter 14 Exceptions to Part 91 seatbelt rules	14.01 14.02	All	1
Chapter 15 Additional rules for external load operations	15.04 15.08 15.10 15.11 15.12	All Other than 15.11(3) and 15.12(2)	3
Chapter 16 Additional rules for dispensing operations	16.02	All	1
Chapter 20 Performance take-off and landing	20.01 20.02	All	2

MOS COMPARISON AND REVIEW FOR A COMBINED TASK SPECIALIST,
INCENDIARY DROPPING AND EXTERNAL LOAD OPERATION

Chapters	Sections	Subsections or paragraphs	Number of applicable MOS pages
weights for other aircraft (simplified for this type of operator)	20.03 20.04 20.06 20.09 20.10 20.12		
Chapter 25 Flight crew training and checking rules	25.01 25.02 25.03 25.04 25.05 25.06	All	4
Chapter 27 Task specialist training and checking rules	27.01 27.02 27.04 27.05	All	2
		TOTAL PAGES	40