ANNEX D

MOS comparison and review for an aerial work (task specialist) C441 aerial survey operation

D.1 Summary

In summary, only 33 of the Part 138 MOS are relevant to this sample operation. Of these 33 pages, only 10 pages represent new material compared to the current rules.

This paragraph summaries the content of these 66 pages. The following section of this Annex specifically lists the relevant chapters and sections of the MOS for this sample operation.

- a. Unchanged from current rules:
 - 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:
 - i. 3 pages are performance which is simpler than current rules.
- c. Incorporating current exemptions and permissions:
 - i. 1 page exceptions to Part 91 seatbelt rules.
- d. Definitions:
 - i. 14 pages in total only a small number of which apply to this sample operation.
- e. New material (10 pages):
 - i. 4 pages flight crew training and checking provisions designed to provide greater flexibility and clarity to industry.
 - ii. 3 pages aerial work passenger rules (entirely new capability for aerial work).
 - iii. 1 page 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.

D.2 Applicable chapters and sections of the 138 MOS

The following table outlines the applicable, chapters, sections, subsections or paragraphs of the Part 138 MOS which are applicable to the example operation in this Annex. It also indicates the number of pages in each chapter, and the total number of pages of the MOS that are relevant to the example operation.

Chapters	Sections	Subsections or paragraphs	Number of applicable MOS pages	
Chapter 1 Preliminary and definitions	1.03 1.04	All	13 (Note: this assumes all definitions in Division 2 are utilised by the operator)	
Chapter 2 Aerial work passengers	2.01	All except 2.01(3)(a) and (b)	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	Unlikely to be necessary for this operation	Not considered to be applicable to this operation	0	
(Note: Chapter 9 is not considered applicable to this operation as high- altitude operations are able to comply with the Part 91 minimum height rules. If a low-level operation was necessary then this could be conducted in accordance with paragraph 91.320(3)(h) which allows low level operations to with 150m of persons, vessels, vehicles, structures or livestock with no height limit if the pilot has a low- level rating.				

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Chapters	Sections	Subsections or paragraphs	Number of applicable MOS pages
However, the risk assessment criteria in chapter 13 would still apply)			
Chapter 11 Carriage of 1 to 9 aerial work passengers or aerial work cargo on IFR flights	11.01 11.02 11.03 11.04	All	1
Chapter 13 Risk assessments and aerial work zones	13.01 13.02	All	1
Chapter 14 Exceptions to Part 91 seatbelt rules	14.01	Subsection (1)	1 (Note: This is actually just 1/3 of a page)
Chapter 20 Performance take-off and landing weights for other aircraft (simplified for this type of operator)	20.01 20.03 20.04 20.05 20.09 20.10 20.11	All	3
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 27.03 27.04 27.05	All	2
		TOTAL PAGES	33