



NTSB MEMORANDUM OF RECORD

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General Aviation Accident Investigation Division, AS-20

Date: February 9th, 2017
Person Contacted: Brian M. Kilburn (Technical Programs Director, Key Lime Air)
NTSB Accident Number: ERA17FA066

Narrative:

The following is a memorandum of record containing the email response from Brian M. Kilburn, Technical Programs Director, Key Lime Air. His responses are noted in red, below the investigative questions asked by the NTSB operations group chairman:

Questions-

SMS Program –

1. Can you please send your SMS manual? I believe you mentioned you had one, but you are also revising your current program for 100% Part 5 compliance by March 2018.

Our current SPM (Safety Program Manual) will be uploaded.

2. To my understanding, your SMS program is not “FAA Approved” yet. Can you itemize at a high level what you are trying to implement by the March 2018 deadline (for example – to my understanding, KLA does not have any form of an ASAP program. Do you plan to implement a program?)

The current SPM is not FAA approved (nor did/does the FAA approve these types of “legacy” safety programs). All requirements of 14 CFR Part 5 will be implemented by March 2018. The intent of Part 5 distills down to 91 recognized “requirements” as identified by FAA (see AC 120-92B). KLA does have an active ASAP program at present.

3. Are employees provided with the SMS manual? How is the program incorporated into the Company Operations Manual?

The SPM is a standalone manual available to all employees through our employee website. All employees are provided safety/SMS (including hazard/incident reporting, SMS fundamentals, ASAP, fatigue management, etc.) training on the first day of indoc.



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Radar Training-

1. Can you please send over the training materials for radar training.

Radar materials will be uploaded.

Discipline of Pilots-

1. Are there any KLA records that Mr. McCaw had been disciplined/ counseled in the past for being late to his destination, per the policy you mentioned previously?

For clarification, the policy discussed previously has nothing to do with being late to a destination, rather it is a policy governing pilots reporting late for work; delays to the destination outside the pilot's control (such as weather, customer delays, ATC delays, maintenance delays, etc.) do not count against a pilots "on-time record." Lance McCaw's records show no tardiness or attendance issues.

Company Operations Manual (COM)-

1. Can you confirm that your current COM (Part 135) is revision 11 (4/20/2016). Have there been any revisions postaccident? If so, are the changes related to the accident?

The current COM is revision 11.

ARGUS/ IS-BAO -

1. Have you completed any audits recently with ARGUS or IS-BAO? Please send the results, if applicable.

Both ARGUS and IS-BAO audits were conducted March 2016. I will inquire if the audit results are available for release and if so, I will upload them.

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