



OUR REF: BCAA/SOD/AAID-18

July 27th, 2018

Captain Delvin Major
Chief Investigator
Air Accident Investigation Department (AAID)
Manx Building
Nassau, N.P., The Bahamas

Re: BCAA Response to Recommendations for N222AH

Dear Captain Major:

Further to your communication ref#: SI 18-004 to the Director General on February 12th, 2018, please note the Bahamas Civil Aviation Authority (BCAA), Safety Oversight Department (SOD) has had an opportunity to review and hence provides an update as follows to the recommendations received.

SOD Recommendation Updates

- 1) The BCAA, SOD has engaged the assistance of the Federal Aviation Administration to assist in the investigation of N222AH. Please see the attached letter from SOD Chief Operations to FAA IFO Manager Mr. James Jelinski (Ref#-Control # 18-000989);

The BCAA, SOD has taken additional initiative measures, which are noted below:

- 2) Heighten surveillance activities at General Aviation – (three (3) daily shifts @ 6am, 9am and 2pm);
- 3) Surveillance Operations at Family Island Airports with the assistance of Royal Bahamas Defence Force that provided transport – (FI Airports visited thus far between January to July 2018 – Marsh Harbour, North Eleuthera, San Salvador, San Andros, Freeport, Governors Harbour, Cat Island, Exuma, Rock Sound, South Bimini and Long Island);
- 4) Joint Operation with the Federal Aviation Administration and Safety Oversight Department at LPIA and General Aviation (One (1) Operation held as of July 2018);
- 5) Holiday Operations Surveillance activities at (LPIA and Marsh Harbour Airports);
- 6) Quarterly Industry Meeting/Information Sessions (Three meetings conduct since January 2018 (Next Industry meeting schedule for July 24th, 2018);
- 7) Launch of revamped Single Pilot Air Operator Certificate and Economic Process (Initiative will provide illegal operators in The Bahamas with an opportunity to qualify through Technical Certification);

- 8) Establishment of an Aviation Industry Working Group (Meetings will involve representatives from Royal Bahamas Defence Force, Royal Bahamas Police Force, Customs, Immigration, Airport Authority, Bahamas Air Navigations Services Division, and Island Administrators to develop innovative ways to reduce illegal activities throughout The Bahamas at its Airports) This will assist with the Authority will surveillance activities at the airports. Note: The BCAA, SOD are looking to implement other initiatives with the goal of reducing illegal operations throughout The Bahamas at its Family Island Airports;
- 9) ICAO clearly indicates it's the sole responsibility of the operator of the aircraft to have in its personal possession a valid medical and license, while operating an aircraft whether private or commercial. The license is only valid based on a current medical. This is a global issue whereby ICAO States find it challenging to check ALL aircraft operating within its airspace, for pilot's current medical and licenses for category class and type. ICAO since the 37th General Assembly notes the importance of accountability and as such the responsibility is that of the pilot to ensure he has the correct documentation while operating any aircraft for personal or commercial use.
- 10) It has always been a practice by the former Civil Aviation Department and that of the BCAA, that ALL New License holders familiarize themselves with the legislation and regulations governing Aviation within The Bahamas. It is customary by the Personnel Licensing Office to provide the website (www.bcaa.gov.bs) information where regulations and legislations are readily available for review. It's important to note that the PEL Office also provides the new license holder with the Cabinet Office (Government Publication) information where the REGs and LEGs can be purchased. The BCAA, SOD agrees a knowledge and skill test should be implemented and are in the process of coordinating with an ICAO Member State on the development and establishment of a testing bank.

A secondary measure has been developed until the testing bank is complete, which is noted below :-

BCAA Safety Oversight Department is in the process of developing an interim law test to commence October 1st, 2018

- All New license holders will be required to complete an Air Law exam facilitated by the Personnel Licensing Section;
- Existing licensed holders will need to complete Air Law exam within two (2) years following the launch on October 1st, 2018;
- The BCAA, SOD will issue an Electronic Bulletin to the Industry and will utilize the ZNS Community Page of the new requirement; and

- 11) At this time it is not prudent for the Authority to discontinue the issuance of converted and validated licenses, as it is normal practice to ensure the applicants are aware and access the laws and regulations governing Aviation within The Bahamas.

NOTE ONLY BAHMIAN CITIZENS LICENSES ARE CONVERTED PENDING VERIFICATION FROM THE ISSUING STATE AND SUPPORTING DOCUMENTS. ALL FOREIGN NATIONALS LICENSES ARE VALIDATED PENDING VERIFICATION FROM THE ISSUING STATE AND RECEIPT OF SUPPORTING DOCUMENTATION. Upon issuance of licenses ALL applicants are provided the website and publications

information. The Authority will seek to implement an added measure through the execution of testing, which is highlighted in detail in response item # 10.

Thanks for your continued cooperation.

Yours sincerely,

Captain Charles B. Beneby
Director General

Cc. Mrs. Julia Brathwaite-Rolle – Manager of SOD
Mr. Donald Barrett – Chief Operations
Mr. Daxton Bethell – Chief Personnel Licensing

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