PART 105 MOS
ASAP TECHNICAL WORKING GROUP
TASKING INSTRUCTIONS and SECOND REPORT

23 September 2022

The Part 105 Manual of Standards (MOS) Technical Working Group (TWG) is established to operate and report to the Aviation Safety Advisory Panel (ASAP) in accordance with the Terms of Reference of the ASAP dated 2017 (or as amended).

BACKGROUND/CONTEXT

Civil Aviation Safety Regulation (CASR) Part 105 was made in December 2019 and will commence on 2 December 2021. As part of this change, the existing legislative instruments that presently apply to parachuting will be repealed. Part 105 is constructed on the basis that CASR Part 149 ASAOs have replaced the existing legal framework for parachuting operations. Where an Approved Self-Administering Aviation Organisation (ASAO) is not yet in place, CASA will need to determine on what basis the non-ASAO parachuting operation may continue to operate.

Since December 2019, Civil Aviation Safety Authority (CASA) has progressed developing the draft MOS and seeks to consult with an ASAP TWG prior to conducting a public consultation activity.

It is intended that the TWG reviews the draft MOS in 1-2 tranches for convenience, however the draft MOS is intended to be publicly consulted as an entire document.

PURPOSE

In conducting this activity, the TWG is to utilise relevant technical expertise and industry sector insight for the analysis, development and review of legislation in accordance with agreed policy principles.

The TWG will:

- Provide industry sector insight and understanding of current needs and challenges.
- Provide current, relevant technical expertise for the development, analysis and review of legislative and non-legislative solutions to the identified issues.
- Assist with the development of policies, regulations, advisory materials and transition strategies.
- Provide endorsement and or conditional endorsement of policies, regulations, advisory materials and transition strategies for consideration by the ASAP and CASA.

SPECIFIC OBJECTIVES

1. The TWG is to evaluate whether the draft Part 105 MOS will:
a) Achieve the policy intent/identified key proposals
b) Be implementable by the Australian aviation industry

2. The TWG is the provide a concise summary to the ASAP recommending either:
a) That the ASAP endorse the Part 105 MOS.
b) That the ASAP endorse the Part 105 MOS provided certain issues are resolved.
c) That the ASAP does not endorse the Part 105 MOS due to underlying policy inconsistencies.

KEY POLICY PROPOSALS

The Part 105 MOS will apply to individuals and organisations involved in sport and recreational parachuting from aircraft and the operators of those aircraft.

The Part 105 MOS will, in conjunction with the Part 91 and 105 regulations, specify the operating rules for these aircraft as well as rules for the safe conduct of parachuting activities. It is intended that the MOS will, where appropriate, contain the rules presently in legislative instruments and CASA-approved operations manuals.

The Part 105 MOS will include delayed start dates for requirements introducing changes unable to be reasonably complied with by the commencement date of the MOS.

The scope of the Part 105 MOS will cover:

- baseline requirements for the safe conduct of parachute descent operations;
- reserve and emergency parachute equipment standards and maintenance of such equipment;
- pilot training and flight time requirements for the issue of ASAO-administered authorisations;
- pilot requirements for descents from recreational aircraft and balloons;
- equipment and instrument requirements for parachuting aircraft;
- personnel fatigue management;
- loading of parachuting aircraft;
- maintenance requirements for aircraft used in parachute training operations.

TWG MEETINGS

- 1 November 2021: First TWG report provided to ASAP
- 9 August 2022
- 23 September 2022: Second TWG report provided to ASAP

ROLES AND RESPONSIBILITIES

CASA	TWG Members
• Organise meetings and workshops, and produce agendas, papers and supporting materials • Facilitate meetings and workshops • Record insights and findings • Communicate openly and consistently with TWG members about project status and issues • Respect the time of all TWG members by minimising work required to achieve outcomes	• Commit to supporting the project objectives and timeline • Engage and collaborate constructively at all times • Prepare for working group activities by reviewing agendas, papers and supporting materials • Provide timely and considered advice in meetings, and between meetings as required • Respond to requests for feedback on draft materials within agreed timeframes

CONSENSUS

A key aim of the TWG is that a consensus be reached, wherever possible, in the finalisation and preparation of advice for the ASAP.

The TWG will be guided by the ASAP Terms of Reference (Section 6 - attached) with respect to determining and documenting consensus.

MEMBERSHIP

Members of the TWG have been appointed by the ASAP Chair, following ASAP processes.

The Part 105 MOS TWG consists of the following members:

- David Smith

- Richard McCooey
- Ian Matthews
- Grahame Hill

The TWG CASA Lead, Brenda Cattle, was supported by CASA subject matter experts during the meeting.

The ASAP Secretariat was represented by Chace Eldridge.

MEETING SUMMARY – 23 SEPTEMBER 2022

- The aim of the meeting was to further discuss and resolve the issues raised by TWG members with the Part 105 MOS (as seen in Appendix 2) and seek the TWG's endorsement for the MOS to go to public consultation.

- The TWG and CASA worked through the MOS collaboratively. Overall, the MOS was generally accepted by the TWG. There were some remaining concerns and recommendations noted below, most of which could be resolved during the legal drafting process:

    - Where possible, MOS provisions should be less prescriptive and more outcomes based.

    - Include a provision for an Approved Self-Administering Aviation Organisation (ASAO) to provide continuing airworthiness support for emergency parachutes, should they desire, after the manufacturer stops supporting it.

    - The use and design of wind-drift indicators over built-up areas.

    - Drop Zone Safety Officer (DZSO) appointment and authorisations.

    - Ground-to-air communication and the use of target panels.

- Future personnel fatigue management strategies were discussed. This will primarily target pilots, not others involved in the operations.

- Two issues of significant importance to the TWG were raised, in relation to hot refuelling and type certification of aircraft in parachuting operations. Although these issues are not currently provided for within Part 105, the TWG maintain that these matters are unique to parachuting operations and should be included in the Part 105 MOS.

    - Hot refuelling is currently permitted in parachuting operations by a legislative instrument which will remain in place until Part 91 provides for it.

    - Although outside of the scope of Part 105, the type certification issue impacts the Part 105 community. As such, the project team undertook to arrange a meeting between the TWG members and CASA's Airworthiness and Engineering Branch. This will discuss possible options for parachuting aircraft to operate with seats removed, to carry more passengers than currently permitted by the aircraft's type certificate or flight manual and regulatory support mechanisms for modifications (doors, handles etc.) that support safe parachuting operations.

- The TWG would like to review the Part 105 MOS after the discussed changes are made and determine with CASA a suitable path forward on the two significant issues before endorsing MOS for public consultation.

PROCESS FOR ACHIEVING CONSENSUS

As required by the ASAP (& TWG) Terms of reference, there must be agreement by all participants on the method used for obtaining consensus.

To obtain consensus, the TWG will discuss their views on the provided material during the meeting then address the below Outcomes.

The CASA Lead has also provided commentary of the effectiveness of the TWG and whether it is believed that the recorded outcomes are a fair representation of the TWG from a CASA perspective.

SUMMARY OF OUTCOMES – Second TWG Report, 23 September 2022

Topic 1 – Suitability of MOS for Public Consultation

FULL CONSENSUS / GENERAL CONSENSUS / (DISSENT)

Comments:
The TWG members did not endorse the current Part 105 MOS for public consultation. They would like to review the amended MOS after the suggestions from this meeting are included. Additionally, the TWG reiterated that the type certification and hot refuelling issues had significant implications for their operations and that they would like to work with CASA to resolve this within Part 105.

CASA Lead Summary
Brenda Cattle
Comment: CASA thanks the TWG members for their ongoing efforts to progress this work. CASA acknowledges the concerns raised by TWG members and will continue to work with the TWG to progress the Part 105 MOS to ensure it achieves the policy intent and provides safe and practical outcomes for the industry.

Appendices

1. Extract from ASAP Terms of Reference
2. Australian Parachute Federation (APF) suggestions for Part 105 MOS
3. TWG Meeting Summary – 9 August 2022

Appendix 1

ASAP and TWG Terms of Reference regarding Consensus (Extract)

6.1 A key aim of the ASAP is that a consensus be reached, wherever possible, in the finalisation and preparation of advice to the CEO/DAS.

6.2 For present purposes, 'consensus' is understood to mean agreement by all parties that a specific course of action is acceptable.

6.3 Achieving consensus may require debate and deliberation between divergent segments of the aviation community and individual members of the ASAP or its Technical Working Groups.

6.4 Consensus does not mean that the 'majority rules'. Consensus can be unanimous or near unanimous. Consensual outcomes include:

6.4.1 Full consensus, where all members agree fully in context and principle and fully support the specific course of action.

6.4.2 General consensus, where there may well be disagreement, but the group has heard, recognised, acknowledged and reconciled the concerns or objections to the general acceptance of the group. Although not every member may fully agree in context and principle, all members support the overall position and agree not to object to the proposed recommendation.

6.4.3 Dissent, where differing in opinions about the specific course of action are maintained. There may be times when one, some, or all members do not agree with the recommendation or cannot reach agreement on a recommendation.

Determining and Documenting Consensus

6.5 The ASAP (and Technical Working Groups) should establish a process by which it determines if consensus has been reached. The way in which the level of consensus is to be measured should be determined before substantive matters are considered. This may be by way of voting or by polling members. Consensus is desirable, but where it is not possible, it is important that information and analysis that supports differing perspectives is presented.

6.6 Where there is full consensus, the report, recommendation or advice should expressly state that every member of the ASAP (or Technical Working Group) was in full agreement with the advice.

6.7 Where there is general consensus, the nature and reasons for any concern by members that do not fully agree with the majority recommendation should be included with the advice.

6.8 Where there is dissent, the advice should explain the issues and concerns and why an agreement was not reached. If a member does not concur with one or more of the recommendations, that person's dissenting

6.9 If there is an opportunity to do so, the ASAP (or Technical Working Group) should re-consider the report or advice, along with any dissenting views, to see if there might be scope for further reconciliation, on which basis some, if not all, disagreements may be resolved by compromise.

Appendix 2

APF Suggestions for Part 105 MOS

1.04(1) APF has further suggested changes to definitions:

Suggest change ***main parachute*** (b)(i) to say: 'packed into the main parachute container of a reserve parachute assembly…'

Suggest change ***packer authorisation*** (a)(iv) to say: 'conduct maintenance on the parachute' instead of saying 'repair minor defects in the parachute, the parachute container or harness'. The reason being: APF has two packer ratings and, this allows different privileges to apply to each rating.

Suggest change ***parachute packing card*** to be ***parachuting packing record*** so, from the outset of the 105 MOS coming into force, the options are clear and, one method of recording data is not suggested as being superior to the other. This change will also affect 5.04 and 5.05 and 5.06.

Suggest a new definition: ***parachute maintenance log*** as the record of parachute packing and maintenance required to be maintained by a parachute training organisation. The parachute maintenance log is to record: 1) packing of main parachutes used by trainee and tandem parachutists, 2) packing of reserve and emergency parachutes used by the parachute training organisation and 3) main parachute and container compatibility inspections.

Suggest change ***rigger authorisation*** (b)(i) to remove the word 'container' before harness as, strictly speaking, the harness is for attaching the parachute to the individual and the container is for stowage of the parachute canopy.

In (b)(ii) remove the words 'using a sewing machine' as the term manufacture covers using a sewing machine and there are other processes in manufacture that use different tools such as punch and dies, etc.

1.04(5)(c) APF suggests for: *Meaning of* ***reserve parachute assembly*** (c) that 'suspension lines' be omitted as these are integral part of 1.04(5)(d) the reserve parachute.

1.04(6) APF suggests that for: *Meaning of* ***trainee parachutist*** add '(c) if the person holds a parachutist certificate – being coached (however described) on a parachutist certificate.' Coaches are not instructors but appointed persons with expertise in certain discipline/(s). Wing suit jumping, angles and canopy relative work taught by coaches and, are not deemed to be training requiring the aircraft pilot to hold a JPA.

1.05 The APF questions if the reading of this could imply a parachute in service – which is/was manufactured to superseded version of the TSO C23 – is no longer authorised for use.

Parachutes are still manufactured to earlier versions of the TSO, such as TSC C23b although there are now later versions of the TSO that apply to new manufacturers. Can APF have clarification from CASA that this does not "unintentionally invalidate" the TSO authorisation of equipment manufactured to an earlier version of the TSO?

2.04(2) APF suggests its not correct for CASA to say an approval made under ANO 103.18 'is taken to meet the requirements of TSO-C23'. ANO 103.18 permitted CASA to

approve equipment that did not comply with TSO-C23b so, perhaps say 'is taken to meet the requirements for approval by CASA when ANO 103.18 was in force' or something to that effect.

2.05 APF suggests the wording could be less convoluted and say a 105 ASAO may specify an alternative means of compliance to the manufacturer's requirement where it produces the same safety outcome.

2.06 APF suggests this could apply to 'emergency parachutes' as well as 'reserve parachutes' if the manufacturer no longer provides airworthiness support.

2.07(3) The same comments made for 2.04(2) apply to 2.07(3) that 'is taken to meet the requirements for approval by CASA when ANO 103.18 was in force' or something to that effect.

3.01(7) The APF suggests that assessment of competency after a JPA has been authorised can be 'peer to peer JPA assessment' otherwise who checks the checkers becomes an issue and a JPE needs to be brought in specially to check the senior pilot.

3.02(2) APF suggests that for 3.02(2) and in line with 105.080(5) & (6) that the 105 MOS clearly state that a PJE may conduct PICUS with a trainee JPS for the purpose of them gaining the required hours, on-type, to conduct parachute operations as PIC.

4.01 The 'paper or fabric streamer' used as a wind drift indicator has a 'weight attached' to orientate it vertically during the descent. The key feature of a 'wind drift indicator' is it has the rate-of-descent of a parachute of around 1000 ft/min. If the wind drift indicator is described in the 105 MOS as a device to simulate the rate of descent of a parachute, then no mention of 'weight being attached' is needed.

4.02(2) Suggest change 4.02(2) to say complies with 4.01 once suitable words to describe a wind drift indicator are found.

4.02(3) APF again suggests that, rather than requiring CASA approval in writing that, allowing the 105 ASAO exposition to describe how **Dropping things other than over populous area** will be managed to protect other airspace users and persons and property on the ground.

Dropping of things other than over populous area is undertaken without CASA express permission on a regular basis for third parties such as Dept of Defence, Australian Maritime Safety Authority and their service delivery services, for training and product development purposes.

5.03(1) APF seeks clarification from CASA that 5.03(1)(b) and (c) allows for APF to adopt or implement alternative means of compliance (AMOC) to a manufacturer requirement for a reserve parachute?

5.05 APF has suggested at 1.04(1) introducing a definition for **parachute maintenance record** and for 5.05 changing heading to **parachute packing cards** to **parachute packing record**. There is a good reason for doing this.

The packing of main parachutes used by a trainee or student are not recorded on a packing card. Main parachutes may be packed many times in a single day and, the standard practice is to record the packing of main parachutes in a ***parachute maintenance log***. This serves to identify the packer and to monitor the number of

deployments for timely replacement of certain component parts such as rigging lines and the drogue parachute.

5.06(1)(iii) Terminology used needs to be brought into alignment with what 5.05 says. This will also affect how 5.06(2) and 5.06(3) read. Change 'card' to 'record'.

5.06(2)(d) APF suggests 'name or any identifier' rather than 'name and any identifier' as either is acceptable rather than both being recorded.

5.07 APF suggests the heading read: **Method of approving return to service of reserve and emergency parachutes** to clarify that it does not capture main parachutes.

5.08(2)(ii) APF recommends using the term parachute packing record. For consistency with what APF suggests for 5.05 above, 5.08(2)(a)(ii) should refer to the **parachute maintenance log** maintained by the parachute training organisation.

5.09(2) The 'note' does not provide for parachutes not certificated under TSO-C23 but complies with a specification approved under repealed ANO 103.18.

5.10(3) APF suggests that rather than 'parachute instructor' it say 'drop zone safety officer' as the DZSO is the more appropriate person to hold accountable.

5.11(1) APF OR 9.3.4 permits a CRW coach to do the compatibility verification for CRW main parachute. See also our comment at 5.49.

5.11(4)(a) APF suggests 'making a statement' is overreach and that signing off the parachute assembly on the 'parachute packing record' is sufficient proof of compatibility. APF recommends throughout the 105 MOS 'packing record' be used instead of 'packing card'.

5.12 APF suggests 5.12(3) be created to permit more than one main parachute to be approved for use with a particular reserve parachute assembly. Some people have several main parachutes for different types of disciplines.

5.13(3) APF suggests change 'person' to read 'instructor' so there in no confusion where the responsibility resides.

5.18 Note 1 APF suggests it should say in second sentence: 'rigger authorisation' instead of 'packer authorisation'. Same applies in Note 1 for 5.19 and 5.20.

5.22(1) APF suggests: 'Subsection to…' should say: 'Subject to...'

5.22(3)(d) APF suggests it is unnecessary to announce the descent will be through cloud as it is not current practice, it increases frequency congestion, particular as some locations where a broadcast needs to be made on three different frequencies.

5.22(5) APF suggests it is unclear what radio procedures apply in class E airspace.

5.24(1)(d) APF operational regulations do not require the details of the main parachute and the container of the reserve parachute assembly to be recorded. (APF OR 12.2.2 says: type of descent, location, date, exit height). If 5.24(1)(e) were to become 5.24(1)(d) the problem is solved.

5.25(1)(a) APF suggests that rather than 'ASAO authorises' the 'chief parachuting instructor or display organiser authorises' as the DZSO is a local appointment. 5.25(4) covers

all other eventualities.

5.25(2)(b) At a parachute display the drop zone safety officer is an 'appointment' for the purpose of the display and not issued as a 'rating or endorsement on a parachute certificate'. Essentially, it is a one-off appointment by the Display Organiser for the day.

APF suggests there is another situation that can easily be covered in 5.25(2)(b) and that is where a group of parachutists organise themselves to undertake parachute descents at a suitable location. APF requires that they agree to appoint one of their number (holding at least Certificate D) to act as DZSO and (maintain a master log of descents made and report any reportable incident. While this is a non-training situation the 105 MOS can allow for this as mentioned above by the 'DZSO being appointed'.

5.31(2) APF questions the justification for not allowing a tandem descent at high altitudes. This is overreach.

As an example, there have been many tandem descents onto Mount Everest and New Zealand allows tandem descents from altitudes exceeding flight level 150 under certain conditions. It would be better to remain silent on such matters and allow the ASAO to specify requirements that apply if it determines to permit tandem descents from high altitudes in its exposition.

5.31(3) The APF suggests that rather than not permitting a descent from flight level 250 unless CASA permission is held, that instead 5.31(3) reflect the words in the note that permit this if the ASAO exposition permits descents from high altitude.

5.31(4) The APF suggests 5.31(4) is unnecessary. Limitations apply to holders of a student parachutist certificate that would not permit a descent at high altitudes. It would be better to say the ASAO must specify the minimum qualifications to undertake descents at high altitudes, so the ASAO can exclude certain certificate holders from being eligible.

5.32(5) The APF suggests 5.32(5) is unnecessary and impractical to record permission to undertake relative work (during a tandem descent) in a person's personal logbook. It is decision made based on the experience of everyone involved in the descent in question on the day.

5.34 APF again suggests that listing all these types is unnecessary and could imply all are deemed suitable where most are not suitable. If the decision is these should stay, then APF suggest 5.34(4) be added to say the ASAO may permit a flotation device mentioned in 5.34(2) to be adapted for use during a parachute descent so it is fit for purpose. 5.34(1) should then mention (2) and (4).

5.40(5) APF suggests that the word 'audible' be inserted before 'altimeter' in the second line for the avoidance of doubt.

5.43(2) APF suggests the word 'training' be inserted between 'parachute' and 'descent' in the second line. A certificated parachutist can undertake a parachute descent independently from a training operation.

5.47(6) - (8) APF again suggests it is far to prescriptive and descriptive. The 105 MOS simply needs to say the ASAO must have an effective system of ground to air communications in place to allow communication between the jump aircraft and

DZSO and or GCO.

5.48 APF suggests that the common traffic advisory frequency be an alternative where airspace is shared between the parachute training operation and other airspace users. Several parachute training organisations use both the discrete frequency and CTAF. The ground control assistant needs to be authorised to use both frequencies.

5.49 APF suggests the 105 MOS say 105 ASAO exposition must contain documented procedures to satisfy the requirement for the parachutist to demonstrate compliance and, the DZSO to have verified compliance with 5.49(1), without having to say it in so many words and cross reference to so many other places.

Presently APF regulations allow a parachute used for CRW to be verified as suitable by a CRW coach. Providing for this in the MOS, will further complicates things so a catch-all statement is recommended.

5.55 APF suggests that it be stated in the 105 MOS that the requirements of 5.55 in respect of balloons only apply to 'parachute training operations' otherwise it requires a 131 ASAO to have procedures in place for parachuting descents from balloons for 'all types of parachute descents' otherwise, balloon jumps by certificated parachutists could be deemed illegal.

Chapter 6 APF suggest a discussion be held by the TWG around what could and should be included under personnel fatigue management.

7.01 APF acknowledges that 105.125 specifically targets weight and balance however, there is a need to provide industry and the regulator with some guidance about allowing the aircraft to be configured for parachuting operations contrary to what the Type Certificate might state in relation to passenger capacity. 105.125(2) suggests the 105 MOS can deal with such matters.

The 30 Aug 2022 draft 105 MOS still does not address the matter of configuring an aircraft for parachuting operations. APF maintains it is important for the parachute industry that it is clearly stated in the 105 MOS that the aircraft may have seats removed, may carry more persons than the Type Certificate specifies and may be modified with steps, external handles, etc to facilitate safe parachuting operations.

7.02(1) APF suggests removing the words 'on each stage of flight' as it seems unnecessary to state this.

7.02(4) The APF questions the need for giving the load sheet to the drop zone safety officer and/or the chief parachuting instructor? The pilot in command is responsible for determining (or checking) aircraft weight and balance calculations done by others. 7.02(4)(c) should say for 'person' loading records should be retained by the 'parachuting training operation'.

Load sheets implies it is a physical record whereas these are now digital, and this allows for the use of EFB's which is becoming the standard throughout the industry.

7.02(5) The APF questions the need for as many as three people to be required to retain a record for three months. The parachute training organisation could be held responsible, rather than individual persons.

7.02 Note 3 The APF suggests note 3 – rather than being a note – be a made a requirement in the 105 MOS that the pilot in command is responsible for loading of the aircraft and the requirement that parachutists connect their restraint before take-off.

Chapter 8 APF suggests that further to 105.105(4) it is logical for the loadmaster be responsible for directing that each person use a parachutist restraint during taxi, take off and if necessary, landing.

Hot refuelling of aircraft used to facilitate a parachute descent are permitted to be carried out IAW CASA EX146/21 – Amendment of CASA EX81/21.

PART 91 expressly states that hot refuelling is only permitted to be carried out for Aerial Work operations and only if the Approved Flight Manual outlines authorisation to do so for which the Cessna 208 Caravan does not.

APF requests hot refuelling be permitted under the 105 MOS so that we capture all parachuting-specific requirements in one regulation.

Appendix 3

TWG Meeting Summary – 9 August 2022

- The aim of the meeting was to discuss the Part 105 MOS exposure draft with the intention of obtaining TWG endorsement for release for public consultation.

- The TWG felt that overall, the MOS was much improved and that their remaining suggestions were minor. The previous concerns of the TWG have been adequately addressed.

- The Civil Aviation Safety Authority (CASA) project team and TWG worked collaboratively through the feedback from the Australian Parachute Federation (APF) on the new MOS exposure draft (Appendix 1). Results of this discussion included:

    - It was understood that organisations can use their own terminology and standards within their operations manuals so long as the MOS requirements are satisfied.

    - CASA will review the drafting of Section 5.20 (2) (b) and (c) to better recognise that a Display Organiser (DO) does not need to be present at a display. The person that the DO nominates to be the Drop Zone Safety Officer (DZSO) need only hold a Certificate D, a lesser requirement than when the DZSO is appointed to a parachute training operation.

    - Descents from above Flight Level 245 require either written permission from CASA or specified procedures as part of the organisation's operations manual, as approved by CASA.

    - An explanatory statement will be included, in addition to the MOS, to provide further clarification on sections 5.08, 5.28, 5.30 and 7.02 and the general policy intent.

    - Section 4.01 will be investigated to determine an approval process for wind-drift indicators and how this can be used over populous areas.

- Consultation is required with CASA's Airworthiness and Engineering Branch around Parts 23 and 121 (type certificates and maximum passenger numbers), as well as with the Australian Skydiving Association to confirm their satisfaction with the exposure draft. The TWG will be updated on the outcomes out-of-session.

- TWG members felt a Plain English Guide would have limited value given that most of the impacted stakeholders do not refer directly to legislation but instead use manuals and guidance provided by organisations such as the APF.

NEXT MEETING

- The next meeting will be held in the coming weeks once a revised version of the exposure draft is available to be reviewed by the TWG. The questions for public consultation, change management and a transition process will also be discussed.