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Civil Aviation Safety Authority

**ADVISORY CIRCULAR
AC 91-20 v1.0**

Reduced vertical separation minima (RVSM) operations - conduct and approvals

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

Advisory circulars are intended to provide advice and guidance to illustrate a means, but not necessarily the only means, of complying with the Regulations, or to explain certain regulatory requirements by providing informative, interpretative and explanatory material.

Advisory circulars should always be read in conjunction with the relevant regulations.

Audience

This advisory circular (AC) applies to Australian aircraft (see section 1.2 - definitions) intending to conduct flights in RVSM airspace.

Purpose

This AC provides information about conducting flights in RVSM and the processes and requirements for obtaining an approval to conduct flights by Australian aircraft in RVSM airspace.

For further information

For further information or to provide feedback on this AC, visit CASA's [contact us](#) page.

Status

This version of the AC is approved by the National Manager, Flight Standard Branch.

Table 1: Status

Version	Date	Details
v1.0	June 2026	Initial AC. This AC replaces CAAP 181A-1(2) - Reduced vertical separation minimum (RVSM) approvals.

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this AC are references to the *Civil Aviation Safety Regulations 1998 (CASR)*.

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1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this AC are listed in the table below.

Table 2: Acronyms

Acronym	Description
AA	Airservices Australia
AAD	assigned altitude deviation
AAMA	Australian Airspace Monitoring Agency
AC	advisory circular
ADS-B	Automatic Dependant Surveillance – Broadcast
AFM	aircraft flight manual
AFMS	aircraft flight manual supplement
AIP	Aeronautical Information Publication
AOC	air operator's certificate
ASE	altimetry system error
ATCS	Air traffic control service
AWC	aerial work certificate
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
CDL	configuration deviation list
CFL	cleared flight level
EASA	European Aviation Safety Agency
FAA	Federal Aviation Administration
FAA DER	FAA Designated Engineering Representative
FL	flight level
MASPS	minimum aircraft system performance specification
MOS	Manual of Standards
NAT	North Atlantic
PIC	pilot in command
RMA	Regional Monitoring Agency
RO	registered operator

Acronym	Description
RVSM	reduced vertical separation minimum
SB	service bulletin
TLS	target level of safety
TVE	total vertical error
VSM	vertical separation minimum

1.2 Definitions

Terms that have specific meaning within this AC are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this AC and the civil aviation legislation, the definition in the legislation prevails.

Table 3: Definitions

Term	Definition
assigned altitude deviation (AAD)	The difference between the transponder Mode C altitude and the assigned altitude/flight level.
Australian aircraft	means: - aircraft registered in Australia; and - aircraft in Australian territory, other than foreign registered aircraft and state aircraft.
automatic altitude control system	A system that is designed to automatically control the aircraft to a referenced pressure altitude.
civil aviation authorisation	means an authorisation under this Act or the regulations to undertake a particular activity (whether the authorisation is called an AOC, permission, authority, licence, certificate, rating or endorsement or is known by some other name). Note: This note is not part of the formal definition. The Act being referred to in this definition is the <i>Civil Aviation Act 1988</i>.
civil aviation legislation	means: - this Act or the regulations; or - legislative instruments made under this Act or the regulations; or - Chapter 7 of the Criminal Code, insofar as that Chapter applies to conduct in relation to: - this Act or the regulations; or - legislative instruments made under this Act or the regulations; or - CASA; or - an officer acting, or purporting to act, in the course of the officer's official duties; or - an authorised person acting, or purporting to act, in accordance with powers conferred under the regulations; or - a person to whom a power or function has been delegated under this Act, the regulations, or an instrument made under this Act or the regulations.

Term	Definition
Note: This note is not part of the formal definition. The Act being referred to in this definition is the <i>Civil Aviation Act 1988</i>.	
foreign registered aircraft	means an aircraft registered: - in a foreign country; or - under a joint registration plan or an international registration plan.
height-keeping performance	The observed performance of an aircraft with respect to adherence to flight crew prescribed flight level. This includes both technical and operational errors.
operator	means: - if the operation of the aircraft is authorised by an AOC, a Part 141 certificate or an aerial work certificate--the holder of the AOC or certificate; or - otherwise--the person, organisation or enterprise engaged in aircraft operations involving the aircraft
Part 131 aircraft	see subregulation 131.005(2).
RVSM airspace	means any of the following: - the airspace, at or above flight level 290, identified in the AIP as airspace where a vertical separation minimum of 1,000 ft applies; - the airspace, at or above flight level 290, designated, or otherwise recognised, by the appropriate authority of a foreign country to be airspace where a vertical separation minimum of 1, 000 ft applies; - airspace, at or above flight level 290, where a vertical separation of 1,000 ft applies under the terms of a Regional Air Navigation Agreement.
state aircraft	means: - aircraft of any part of the Defence Force (including any aircraft that is commanded by a member of that Force in the course of duties as such a member); and - aircraft used in the military, customs or police services of a foreign country.
these Regulations	includes CAR.
Note: This note is not part of the formal definition. The practical impact of this definition is that the term 'these Regulations' includes the CASR and CAR. By extension, also included are any legal requirements made under the authority of a CASR or CAR, which would include all MOS's and exemptions, and some CAOs (a limited number of CAOs are made directly under the authority of the Act and not a CAR).	

1.3 References

Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

Table 4: Legislation references

Document	Title
Part 11 of CASR	Regulatory administrative procedures
Part 21 of CASR	Certification and airworthiness requirements for aircraft and parts
Part 91 of CASR	General operating and flight rules
Regulation 11.055 of CASR	Grant of authorisation
Regulation 91.045 of CASR	Approvals by CASA for Part 91
Regulation 91.655 of CASR	RVSM airspace

Advisory material

CASA's advisory materials are available at <https://www.casa.gov.au/publications-and-resources/guidance-materials>

Table 5: Advisory material references

Document	Title
AC 11-04	Approvals under CASR Parts 91, 103, 119, 121, 129, 131, 132, 133, 135, 138 and 149 (including MOS)
AC 21-08	Approval of modification and repair designs under Subpart 21.M
AMC/GM Part 91	Acceptable means of compliance and guidance material - General Operating and Flight Rules
OPS.04	Navigation authorisations (OPS.04) - protocol suite

International Civil Aviation Organization documents

International Civil Aviation Organization (ICAO) documents are available for purchase from <http://store1.icao.int/>

Many ICAO documents are also available for reading, but not purchase or downloading, from the ICAO eLibrary (<https://elibrary.icao.int/home>).

Table 6: ICAO references

Document	Title
ICAO Doc 4444	Procedures for Air Navigation Services — Air Traffic Management (PANS-ATM)
ICAO Doc 9574	Manual on a 300 m (1 000 ft) Vertical Separation Minimum Between FL 290 and FL 410 Inclusive

Other reference documents

Table 7: Other reference documents

Document	Title
EASA AMC/GM - Part-SPA	Acceptable Means of Compliance (AMC) and Guidance Material (GM) for Part-SPA - Operations requiring Specific Approvals
EASA CS-ACNS	Certification Specifications and Acceptable Means of Compliance for Airborne Communications, Navigation and Surveillance
FAA AC 91-85B	Authorization of aircraft and operators for flight in reduced vertical separation minimum (RVSM) airspace

1.4 Forms

CASA's forms are available at <http://www.casa.gov.au/forms>

Table 8: Forms

Form number	Title
	Application - Navigation Authorisation - RVSM - Initial/renew/change (CASR 91.655)

2 Background

2.1 RVSM airspace

- 2.1.1 Historically, the decreasing accuracy of barometric altimeters at higher altitudes resulted in 2,000ft of vertical separation being provided between aircraft operating at and above flight level (FL) 290, instead of the 1,000ft below FL 290. Over time, the increasing volume of air traffic on critical routes necessitated a reduced vertical separation minima (RVSM) of 1,000ft.
- 2.1.2 This reduced vertical separation was established subject to these additional safety controls:
- comprehensive minimum aircraft system performance specifications (MASPS) (airworthiness)
 - specific operational procedures
 - monitoring the vertical accuracy of aircraft.
- 2.1.3 On 27 March 1997 the North Atlantic (NAT) Region became the first ICAO region to implement RVSM. Australia implemented RVSM airspace in 2001.

2.2 Rules specifically relating to operations in RVSM airspace

- 2.2.1 The RVSM airspace operational rules are contained in:
- section 11.07 of the Part 91 Manual of Standards (MOS), which requires compliance with the procedures published in the authorised aeronautical information¹ (in Australia, these procedures are in section 8 of ENR 1.1 of the AIP Book)
 - sections 21.05 and 21.08 of the Part 91 MOS (see paragraph 2.2.2)
 - regulation 91.655 of CASR (see paragraph 2.2.3).
- 2.2.2 Sections 21.05 and 21.08 of the Part 91 MOS require the pilot in command (PIC) of an aircraft operating in RVSM airspace, in an Australian FIR, to ensure certain reports are made to Air Traffic Services (ATS). These are:
- if the aircraft deviates from its assigned FL by 300ft or more
 - if the aircraft performance degrades, when in controlled airspace, below the level required for the RVSM airspace or below the aircraft capability reported in the aircraft's flight notification.
- 2.2.3 Regulation 91.655 of CASR, in relation to Australian aircraft, requires the operator and pilot in command to ensure that, if the aircraft is flown in RVSM airspace, one of the following has occurred:
- the operator holds an approval under regulation 91.045 for the aircraft to be flown in RVSM airspace
 - the pilot in command (PIC) of the aircraft has been given an air traffic control clearance or an air traffic control instruction for the aircraft to be flown in RVSM airspace.

Note: The wording of regulation 91.655 of CASR requires each aircraft to be the subject of, or included within, the relevant approval.

¹ In most countries, the authorised aeronautical information is the AIP for the country.

- 2.2.4 Subregulation 91.045(4) states that an operator is taken to hold an approval under regulation 91.045 for an activity if the activity is authorised under either:
- the operator's AOC or another *civil aviation authorisation* held by the operator
 - or
 - if the operator is required under these Regulations to have an exposition or operations manual—the exposition or operations manual.
- 2.2.5 Operators are reminded that, in relation to authorising activities within an exposition or operations manual, changes to these documents are subject to the change rules of the relevant CASR part.

Example

An Australian air transport operator is subject to Part 119 of CASR.

The operator is adding an individual aircraft to their fleet of a type/model, and the operator already has multiple individual aircraft registrations approved to conduct operations in RVSM airspace of that type/model.

Since regulation 91.655 of CASR requires each individual aircraft to be the subject of, or included within, a relevant approval, adding the new individual aircraft registration mark to the exposition list of aircraft conducting operations in RVSM airspace would be a significant change to the exposition due to the wording of paragraph 119.020(c) of CASR.

Therefore, to make this change to the exposition, the operator must apply for a significant change to the exposition. For administrative purposes, CASA will also issue the operator a separate collective approval instrument.

Note: Arising from the final approval, CASA notifies the Australian Airspace Monitoring Agency (AAMA) of the individual registration now being approved for RVSM.

2.3 Rules relating to the issuance of an approval

- 2.3.1 In accordance with regulation 11.005 of CASR, Part 11 of CASR applies to authorisations. All approvals under regulation 91.045 are a kind of authorisation². All significant change approvals are also a kind of Part 11 authorisation.
- 2.3.2 The other Part 11 regulations most relevant (not a complete list) to the issuance of an RVSM approval under regulation 91.045 include:
- regulation 11.030 - when an application is taken to be complete (practically, an application has not officially been made to CASA unless the application is complete)
 - regulation 11.040 - enables CASA to ask an applicant to provide more information and pause application assessment until the information is provided
 - regulation 11.050 - material that CASA may take into account when deciding on an application, and what CASA must do if proposing to take into account material adverse to an applicant

² See definition of authorisation in regulation 11.015 of CASR.

- regulation 11.055 - outlines that CASA may only grant an authorisation if certain conditions listed in this regulation are met.³

2.4 Operational effect of RVSM approvals

2.4.1 General

- 2.4.1.1 The Part 91 RVSM approval combines aircraft eligibility (airworthiness and configuration) and operator capability (procedures and systems including airworthiness control) aspects. The approval is issued to an operator and is specific to an individual aircraft, even if listed as part of a table of approved aircraft for that operator.
- 2.4.1.2 As the RVSM approval is an operator-based approval, the differences in which entity constitutes the operator for the purpose of the approval need to be understood. Effectively, *operator* of an aircraft has a dual meaning. For operations conducted under an Air Operator's Certificate (AOC), aerial work certificate (AWC) or Part 141 certificate, the *operator* is the holder of the relevant certificate. For all other operations, the *operator* is the person, organisation or enterprise engaged in operating the aircraft.
- 2.4.1.3 When identifying the *operator*, apply the test; is the operation authorised by a certificate:
- if yes, operator = certificate holder
 - if no, operator = entity conducting or controlling the operation.

2.4.2 Multiple aircraft or multiple operators

- 2.4.2.1 From a practical perspective, Parts 119 and 138 of CASR require AOC or AWC holders to have operational control and ensure aircraft being used are operating in accordance with their continuing airworthiness arrangements. The effect being that the operator is not necessarily the registered operator (RO).
- 2.4.2.2 Where the operator is an individual who isn't performing RVSM operations under the operational control of another entity, then that operator must hold an RVSM approval. Consequently, where an individual intends to operate more than one aircraft in RVSM airspace, then each aircraft must be the subject of, or included within, an RVSM approval.
- 2.4.2.3 An RVSM approval for a specific aircraft is attached to the operator's authorisation and therefore Operator A's RVSM approval does not authorise Operator B to conduct operations in RVSM airspace, even if the same aircraft is being used. Approvals are not transferable between operators.
- 2.4.2.4 It is acceptable for one aircraft to have more than one RVSM approval at a given time.
- 2.4.2.5 This regulatory approach has implications in relation to airworthiness and operational requirements which are described in the relevant sections of this AC.

2.5 Australia's RVSM performance monitoring program

- 2.5.1 Globally, there are commonly accepted standards which aircraft must meet and maintain to operate within RVSM airspace and receive the reduced vertical separation. One of the requirements is that each individual aircraft needs to be on a master list maintained by a relevant ICAO approved Regional Monitoring Agency (RMA). These agencies ensure the safe

³ Additional information relating to the tests of safety mentioned in regulation 11.055 are contained in AC 11-04.

use of specific airspace designated by regional agreement. The master list is the aircraft height keeping performance monitoring database.

- 2.5.2 For Australian aircraft, this master list is maintained by the [Australian Airspace Monitoring Agency](#) (AAMA) which is an RMA. Under the Asia-Pacific regional agreement, an aircraft will only be added to the AAMA master list after the AAMA receives notification from CASA that the aircraft is appropriately approved. Issuing this advice to the AAMA is part of CASA's internal processes once an approval has been granted in relation to an individual aircraft.
- 2.5.3 If an aircraft is not on a master list, the potential exists for an air traffic service to refuse to separate the aircraft using RVSM standards, which could result in the aircraft not receiving an air traffic control clearance to operate at FL290 or above, or have a clearance for these higher altitudes delayed. Consequently, this could adversely affect the fuel consumption of the aircraft and affect the safe achievement of the planned flight and, in particularly adverse circumstances, require the aircraft to divert to another aerodrome for additional fuel or return to the departure aerodrome.
- 2.5.4 Operators are recommended to thoroughly review the information available on the [AAMA website](#).
- 2.5.5 The AAMA provides RVSM performance monitoring within Australian FIRs to aircraft equipped and approved to use Automatic Dependant Surveillance - Broadcast (ADS-B).
- 2.5.6 Before commencing operations in RVSM airspace, operators are recommended to contact the AAMA to confirm the suitability of ADS-B monitoring for their aircraft.
- 2.5.7 Monitoring can be conducted on any flight conducted within an area of ADS-B surveillance. Monitoring will be undertaken on a continuous basis for all observed flights within the altitude band FL290 to FL410. The last successful monitoring date is published on the AAMA website.
- 2.5.8 For operations in the Australian FIR and in accordance with procedures in the AIP, flight crews should report to the AAMA all flight level deviations of 300FT or more from the aircraft assigned level, irrespective of the cause of the deviation.

2.6 Differences between Part 91 RVSM approvals and pre-December 2021 approvals

- 2.6.1 The current RVSM rules differ from those in place before December 2021 (then regulations 181A to 181X of the Civil Aviation Regulations 1988).
- 2.6.2 A key change is the removal of the dual approvals under the old rules, whereby each individual aircraft was required to be the subject of a specific airworthiness approval (CAR 181G) and each operator had to hold an operational approval (CAR 181M). Under Part 91, there is just a singular approval under regulation 91.045 of CASR. For some operations such as Part 91 only operations the approval requirements are simplified and remove some legacy aspects such as logbook certification or certificate of training in RVSM.
- 2.6.3 A considerable amount of useful reference material already exists on RVSM airworthiness and operational matters, and CASA does not wish to simply replicate the material. Accordingly, readers seeking detailed information about RVSM certification and operational practices are advised to review the latest revisions of the following documents:
- ICAO Doc 9574 - Manual on a 300 m (1 000 ft) Vertical Separation Minimum Between FL 290 and FL 410 Inclusive
 - FAA AC 91-85B - Authorization of aircraft and operators for flight in reduced vertical separation minimum (RVSM) airspace
 - EASA Acceptable Means of Compliance (AMC) and Guidance Material (GM) for Part-SPA - Operations requiring Specific Approvals

- EASA Certification Specifications and Acceptable Means of Compliance for Airborne Communications, Navigation and Surveillance (CS-ACNS).

3 Conduct of operations in RVSM airspace

3.1 Overview

- 3.1.1 Section 3 is written from the perspective that flight crew members plan their flight. However, this content equally applies to flight planning conducted by dedicated non-flight crew personnel if they plan or dispatch flights in RVSM airspace.

3.2 Procedures for operations in Australian RVSM airspace

3.2.1 Flight planning and pre-flight

- 3.2.1.1 During flight planning, flight crew should pay particular attention to conditions which may affect operation in RVSM airspace. These include, but may not be limited to:

- verifying the aircraft and operator are approved to conduct operations in RVSM airspace
- annotating the flight plan to be filed with the appropriate code for conducting operations in RVSM airspace⁴
- ensuring the aircraft registration number (Reg/) is listed in Item 18 (Other Information), if different than that listed in Item 7 (Aircraft Identification).

Note: An aircraft or operator not meeting the requirements for conducting operations in RVSM airspace, including an aircraft without operable equipment required for conducting operations in RVSM airspace, is referred to as non-RVSM.

- 3.2.1.2 During pre-flight procedures, the flight crew should accomplish the following actions:

- review continuing airworthiness logs and forms to determine the condition of equipment required for flight in RVSM airspace, and ensure maintenance action has been taken to correct defects, if any, to required equipment
- during the external inspection of aircraft, pay particular attention to the condition of static sources, the fuselage skin near each static source, and any other component affecting altimetry system accuracy

Note: This check may be performed by a qualified and authorised person other than the pilot, such as a flight engineer or ground engineer.

- before take-off:
 - set the aircraft altimeters to the barometric pressure for local altimeter setting (QNH) and ensure the altimeters display a known elevation, such as field elevation, within the limits specified in the aircraft operating manual or Aircraft Flight Manual (AFM) (as applicable)

⁴ The Australian Domestic Flight Notification Form, International Civil Aviation Organization (ICAO) flight plan, FAA Form 7233-4, Pre-Flight Pilot Checklist and International Flight Plan, Item 10, Equipment and Capabilities, should be annotated with the letter W (RVSM Approved) for filing in RVSM airspace.

- ensure the 2 primary altimeters agree within limits specified by the aircraft operating manual or Aircraft Flight Manual (AFM) (as applicable), with the difference between the known elevation and the elevation displayed on the altimeters not exceeding 75 ft

Note: An alternative procedure using atmospheric pressure at aerodrome elevation (QFE) may also be used.

- ensure equipment necessary for flight in RVSM airspace is operational and resolve any indications of malfunction before commencing flight in RVSM airspace.

3.2.2 Procedures before RVSM airspace entry

3.2.2.1 The following equipment must be operating normally at entry into RVSM airspace:

- Two independent primary altitude measurement systems.
- One automatic altitude control system.
- One altitude alerting device.

3.2.2.2 If any required equipment fails prior to the aircraft entering RVSM airspace, the pilot must advise ATC of the inability to operate as an RVSM aircraft and if necessary, request a new clearance to avoid flight in this airspace.

Note: Different RVSM airspace jurisdictions can have different requirements. The operator or pilot must review the requirements for operational transponder(s) and TCAS in each RVSM area of intended operation.

3.2.3 During operations in RVSM airspace

3.2.4 In-flight, the flight crew should accomplish the following actions:

- comply with aircraft operating restrictions (if required for the specific aircraft Group) related to RVSM airworthiness approval
- place emphasis on promptly setting the sub-scale on all primary and standby altimeters to 1013.25 hPa (29.92 in. Hg) when climbing through the transition altitude and rechecking for proper altimeter setting when reaching the initial cleared flight level (CFL)
- in level cruise, it is essential the aircraft accurately maintains its assigned level, which requires particular care being taken to ensure ATC clearances and instructions are fully understood and followed
- except in contingency or emergency situations, the aircraft should not intentionally depart from its assigned level without a positive clearance or instruction from ATC
- during cleared transition between FLs, the aircraft must not be allowed to overshoot or undershoot the assigned level by more than 150 ft (45 m).

Note: If installed, it is recommended altitude level-offs be accomplished using the altitude capture feature of an automatic altitude control system.

- ensure an automatic altitude control system is operative and engaged during level cruise, except when circumstances such as the need to retrim the aircraft or turbulence require disengagement

- ensure adherence to cruise altitude is done by reference to one of the two primary altimeters
- ensure the altitude alerting system is operational
- at CFL, ensure the two primary altimeters agree within 200 ft (60 m) or a lesser value if specified in the AFM.

Important

Failure of the 2 primary altimeters to agree within this margin will require the altimetry system to be reported as defective and notified to ATC.

It is recommended that flight crew note the difference between the primary and standby altimeters for use in contingency situations.

- at intervals of approximately 1 hour, make cross-checks between the primary altimeters and the standby altimeter:
 - the normal pilot scan of flight deck instruments should suffice for altimeter cross-checking on most flights
 - when operating in surveillance airspace (identified via aircraft transponder or ADS-B), the initial altimeter cross-check should be performed after level-off
 - in procedural airspace (such as oceanic and remote continental), a cross-check should be performed and recorded in the vicinity of the point where oceanic and remote continental navigation begins (e.g., on coast out)
 - some aircraft have automatic systems which compare the two primary altimetry systems and include monitoring, warning, and fault functions (such systems sometimes automatically record faults but may not easily enable deriving a record of the differences between the primary altimetry systems)
- normally, the altimetry system being used to control the aircraft should be selected to provide the input to the altitude-reporting transponder transmitting information to ATC
- if ATC notifies the pilot of an assigned altitude deviation (AAD) error equal to or exceeding 300 ft (90 m), the pilot should take action to return to the assigned level as expeditiously as possible.

3.2.5 Contingency procedures after entering RVSM airspace

- 3.2.5.1 If a situation arises where the flight crew realises they no longer can comply with RVSM requirements (whether due to aircraft system failure, weather, etc.), they must request a new clearance from the controller as soon as the situation allows. If a new clearance is not available or the nature of the emergency requires rapid action, the pilot should notify ATC of their action and contingency procedures.
- 3.2.5.2 Operators should refer to the RVSM section of the relevant AIP/AIM when experiencing abnormal situations and implementing contingency procedures.
- 3.2.5.3 The crew should also notify ATC when the implementation of the contingency procedures is no longer required.

3.2.6 Post flight

- 3.2.6.1 When making a continuing airworthiness log entry for a height keeping system malfunction, the pilot should provide sufficient detail to enable effective troubleshooting and repair of the system. The pilot should detail the actual defect and the crew action taken to try to isolate and rectify the fault.

- 3.2.6.2 The following information should be recorded when appropriate:
- primary and standby altimeter readings
 - altitude selector setting
 - sub-scale setting on altimeter
 - autopilot used to control the aircraft and any differences when an alternative autopilot system was selected
 - differences in altimeter readings, if alternate static ports selected
 - use of air data computer selector for fault diagnosis procedure
 - the transponder selected to provide altitude information to ATC and any difference if alternate transponder or altitude source is manually selected.

3.3 Operations in RVSM airspace outside Australia

- 3.3.1 CASA's approval of RVSM airspace operations for an Australian registered aircraft enables the aircraft to conduct operations in RVSM airspace worldwide, subject to the aircraft and operator meeting any specific requirements for different geographic areas.
- 3.3.2 Operators starting to conduct operations in RVSM airspace or in an RVSM airspace area that is new to them must ensure that their programs incorporate any operations, continued airworthiness and height monitoring requirements unique to the new area of operations. This information is usually contained in guidance material for particular areas such as the AIP or AIM.

Example - United States of America (USA) controlled RVSM airspace

Operators and pilots should reference the following document before conducting operations in RVSM airspace in USA controlled RVSM airspace:

- USA AIM, Chapter 4, Section 6, Operational Policy/Procedures for Reduced Vertical Separation Minimum (RVSM) in the Domestic U.S., Alaska, Offshore Airspace and the San Juan FIR
- USA AIP, En Route Section 7, Oceanic Operations, as applicable.

4 Aircraft eligibility for operations in RVSM airspace

4.1 General

- 4.1.1 A key safety element underpinning safe RVSM aircraft operations is that airworthiness performance requirements are contained in a comprehensive minimum aircraft system performance specification (MASPS).

4.2 Applicable standards

- 4.2.1 To be eligible for operations in RVSM airspace, the Aircraft Flight Manual (AFM) or AFM Supplement (AFMS) should clearly state the aircraft complies with RVSM performance standards.
- 4.2.2 CASA will accept without further action, an AFM approved by the state of design of a recognised country as defined in regulation 21.010B of CASR or EASA as defined in regulation 21.010A of CASR. CASA will also accept an AFM approved by other countries with which Australia has agreements in accordance with regulation 21.010C of CASR.
- 4.2.3 CASA will accept AFMS from an FAA Designated Engineering Representative (DER) as meeting the requirements of regulation 21.470 of CASR. However, EASA Design Organisation Approvals are not accepted under that regulation. Refer to AC 21-08 for further information. Only EASA approved Supplemental Type Certificates (STCs) are accepted by CASA.
- 4.2.4 ICAO Doc 9574 states the RVSM MASPS includes specifications and procedures for the separate aspects of type approval, release from production, and continued airworthiness and is included in the following documents for global application:
- Joint Aviation Authority (JAA) Temporary Guidance Leaflet (TGL) No. 6. JAA TGL No. 6 was effectively transposed into EASA CS-ACNS as the RVSM airworthiness certification standard
 - Federal Aviation Administration (FAA) Document 91-RVSM, Guidance Material on the Approval of Operators/Aircraft for RVSM Operations, since superseded by FAA AC 91-85B.

4.3 Minimum aircraft equipment

- 4.3.1 For operations in RVSM airspace in Australian FIRs, the AIP Book specifies the minimum mandatory equipment.
- 4.3.2 For operations in RVSM airspace outside of the Australian FIRs, the relevant national AIP or AIM will in most cases specify the equipment required.

4.4 Continuing airworthiness

- 4.4.1 The registered operator is responsible for continuing airworthiness of the systems affecting RVSM performance on the aircraft. The registered operator must ensure that it complies with the appropriate instructions for continued airworthiness (ICA). Further matters related to continuing airworthiness are contained in section 5 of this AC.

4.5 RVSM performance

- 4.5.1 When height-keeping errors are recorded or received, the operator should take immediate action to rectify the conditions that caused the errors and provide follow-up reports, if requested by CASA.

5 Managing continuing airworthiness for RVSM airspace operations

5.1 General

- 5.1.1 Each operator conducting operations in RVSM airspace must ensure the aircraft has:
- an approved maintenance program (AMP), an approved system of maintenance, or a maintenance schedule appropriate for the aircraft type
 - the equipment required to conduct operations in RVSM airspace.
- 5.1.2 The scope and complexity of the AMP, the approved system of maintenance, or a maintenance schedule will depend on whether the operation is conducted under an AOC, AWC or Part 141 certificate, or as a Part 91 only operation.
- 5.1.3 The AMP, approved system of maintenance, or maintenance schedule must include any necessary provisions to address the operator's intended operations in RVSM airspace and the manufacturer's recommended maintenance program.
- 5.1.4 The AMP, approved system of maintenance, or maintenance schedule is required to consider any applicable Airworthiness Directives (AD) or mandatory Service Bulletins (SB) that may relate to equipment required to conduct conducting operations in RVSM airspace.
- 5.1.5 Emphasis within the AMP, approved system of maintenance, or maintenance schedule should be on maintaining and ensuring total system performance, accuracy, availability, reliability, and integrity for the intended operations in RVSM airspace.
- 5.1.6 ICAO Doc 9574 and the referenced RVSM MASPS detail that RVSM performance depends on maintaining the aircraft altimetry and height-keeping equipment in accordance with approved procedures and servicing schedules.
- 5.1.7 FAA AC 91-85B develops the idea of a practical data-package and maintenance-program approach. It states that an RVSM airworthiness approval data package should include RVSM-specific maintenance instructions for initial and continued airworthiness, and those instructions should ensure that all sources of Altimetry System Error (ASE) and aircraft systems performance degradation can be assessed and controlled. It also identifies the need for in-flight defect reporting procedures that help identify sources of ASE.
- 5.1.8 EASA CS-ACNS places RVSM in Subpart E, Section 2 — Reduced Vertical Separation Minimum (RVSM). It supports the same core principle that the aircraft must remain compliant with the approved RVSM system design and performance requirements, and details RVSM system required functions, integrity, continuity, system performance and altimetry system accuracy.

5.2 Continuing airworthiness requirements – AOC, AWC and Part 141 certificate holders

5.2.1 Airworthiness/maintenance program requirements

- 5.2.1.1 CASA requires operators who are AOC, AWC or Part 141 certificate holders to demonstrate an ability to maintain the aircraft in an airworthy condition, specifically addressing maintenance

procedures designed to maintain the conformity and integrity of applicable navigation equipment relevant to the aircraft remaining capable of RVSM airspace operations.⁵

- 5.2.1.2 The AMP, approved system of maintenance, or maintenance schedule should be compatible with an operator's organisation and able to be implemented and supervised. Maintenance personnel should be familiar with the operator's AMP, approved system of maintenance, or maintenance schedule, their individual responsibilities in accomplishing that program, and the availability of resources within or outside of the maintenance organisation which may be necessary to ensure program effectiveness (for example, service bulletin or service letter information).
- 5.2.1.3 Equipment maintenance may be addressed as a specific program pertaining to equipment required for conducting RVSM airspace operations or may be integrated within the AMP, approved system of maintenance, or maintenance schedule.
- 5.2.1.4 The maintenance program should clearly identify the RVSM-specific maintenance requirements, relevant manual content, and any special procedures or documentation introduced by the RVSM authorisation. Where applicable, this should include inspection criteria, training, and calibration and test requirements for RVSM-relevant systems and areas, such as:
- pitot-static alignment
 - static source/probe condition
 - skin waviness
 - altimetry systems
 - altitude alerting and reporting
 - automatic altitude control
 - autopilot accuracy and integrity
 - static system leak checks
 - geometric inspections
 - test equipment use
 - pitot-static testing.
- 5.2.1.5 The program should also identify any applicable time-limited inspections, repetitive inspection intervals, functional checks and post-maintenance test requirements necessary to ensure the aircraft remains compliant with its approved RVSM configuration.

5.2.2 Configuration control and system modifications

- 5.2.2.1 Registered operators should evaluate aircraft alterations to identify any changes which impact altitude-keeping ability. The operator should establish that an alteration has not affected the system(s) required for operation in RVSM airspace, or, if it was affected, confirm compliance with associated performance standard requirements.
- 5.2.2.2 When modifying an aircraft based on an approved design change, the owner of the approved design change should identify any effect on RVSM performance. Operators should confirm that an aircraft continues to remain eligible for operations in RVSM airspace after each repair or modification.
- 5.2.2.3 The registered operator should ensure systems and components required for operations in RVSM airspace are not adversely affected when incorporating software changes, service bulletins, hardware additions, or modifications. Any changes to system components should be

⁵ Under Parts 119, 138, 141 and 142 of CASR, the certificate holder's exposition or operations manual must include a description of the arrangements for managing the continuing airworthiness of the operator's aircraft.

consistent with the aircraft manufacturer, avionics manufacturer, industry, or CASA accepted criteria or processes.

5.2.3 Return to service procedures

- 5.2.3.1 Procedures should be included to upgrade, downgrade, remove or restore an aircraft RVSM capability following maintenance, defect rectification, configuration changes or return-to-service action. The method for controlling the operational status of the aircraft should ensure that flight crew, dispatch, maintenance and other relevant personnel are aware of the aircraft current RVSM capability, any system limitations, and whether the aircraft is approved for RVSM operations.
- 5.2.3.2 The procedures should also address the use of the MEL, CDL and any permissible unserviceability approvals, including the conditions, placarding, maintenance actions, operational limitations and return-to-service requirements necessary before RVSM capability is restored.
- 5.2.3.3 The MEL and CDL should be reviewed to ensure that any relief applied under the MEL or CDL takes account of the aircraft RVSM approval and continued RVSM capability. Where an aircraft is operated with an allowable defect, missing item, configuration deviation or other relief under the MEL or CDL, the operator should determine whether the relief limits, restricts or prevents RVSM operations.

5.2.4 Airworthiness records

- 5.2.4.1 The registered operator should keep suitable records, including the operator's own records and access to records of any applicable contract maintenance organisation. This ensures the operator and CASA can determine the appropriate airworthiness configuration and status of each aircraft.
- 5.2.4.2 Contract maintenance organisations should have appropriate records and instructions for coordination of records with the operator.

5.3 Continuing airworthiness requirements – Part 91 only

5.3.1 Airworthiness/maintenance program requirements

- 5.3.1.1 It is the responsibility of the registered operator (RO) to ensure the aircraft's continuing airworthiness.

Note: During Part 91 only operations, the registered operator and aircraft operator (PIC or flight crew) conducting operations in RVSM airspace in the aircraft are often two different entities.

- 5.3.1.2 Registered operators and the aircraft operator should each ensure that the continuing airworthiness procedures and requirements otherwise described in an exposition or operations manual pertaining to RVSM (see section 5.2 above) are satisfied to the extent necessary for maintaining the required system performance for the intended RVSM airspace operations.
- 5.3.1.3 The registered operator should keep suitable records, including access to relevant records held by the operator's maintenance organisation, to enable the operator and CASA to determine the approved RVSM configuration and current airworthiness status of each aircraft.

- 5.3.1.4 Where maintenance is contracted, the registered operator should ensure that the maintenance organisation has the necessary RVSM instructions, configuration data and record-keeping arrangements to support coordination with the operator and maintain the aircraft approved RVSM status.

6 RVSM procedures and documentation

6.1 General

- 6.1.1 The requirements relating to published operating procedures and documentation vary according to whether the operation is conducted under the authority of an AOC, AWC or Part 141 certificate, or as a Part 91 only operation.

6.1.2 AOC, AWC and Part 141 certificate holders

- 6.1.2.1 The operator's exposition or operations manual must include details of each plan, process, procedure, program and system implemented by the operator to safely conduct and manage their operations.
- 6.1.2.2 The level of detail required in the operator's RVSM procedures will depend on how fully the RVSM operational requirements are integrated into the aircraft OEM procedures, AFM/AFMS, approved modification or STC data, RVSM data package, operations manual, or other supporting documentation.
- 6.1.2.3 For aircraft where RVSM capability was added after original manufacture, the operator should assess the level of procedural integration to ensure flight crew have appropriate instructions and procedures to comply with the applicable RVSM operational requirements, including those matters described in section 3 of this AC.

6.1.3 Part 91 operations

- 6.1.3.1 Although there is not a regulation specifically stating Part 91 only RVSM operator must have procedures and processes, CASA considers such procedures necessary to ensuring an acceptable level of aviation safety.
- 6.1.3.2 Operators are advised to provide with their RVSM approval application their proposed operating procedures and documentation which would assure safe conduct of those operations. It is recommended that the procedures and documentation contain at least the relevant matters described in section 3 and 5 of this AC.
- 6.1.3.3 For many aircraft 'natively' designed and equipped to be operated in RVSM airspace, the AFM and the relevant sections of the applicable AIP/AIM would be taken to satisfy the RVSM documentation necessary to be granted the RVSM approval. Where an aircraft is modified with equipment to become RVSM capable, the aircraft type certificate holder, STC holder, or Part 21 authorised modification or repair approval holder should provide the relevant approved data, including any AFM/AFMS supplements, procedures and continuing airworthiness instructions necessary to satisfy the applicable RVSM documentation requirements.

7 Flight crew training and competency for RVSM

7.1 General

- 7.1.1 Flight crew conducting operations in RVSM airspace must competently apply the procedures and knowledge associated with operations in that RVSM airspace.
- 7.1.2 There are no pilot ratings or endorsements which specifically apply to conducting operations in RVSM airspace, however there is a presumption that RVSM airspace operations are conducted under the IFR and that the operator and the PIC have the appropriate authorisations to conduct IFR operations. Consequently, this section is divided into subsections outlining the flight crew training and experience necessary to ensure relevant competency.

7.2 Theory and practical training

- 7.2.1 RVSM training was originally a separate and bespoke matter, but as RVSM airspace usage has ubiquitous in modern aircraft, RVSM airspace training is now embedded in most RVSM capable aircraft type-rating training.
- 7.2.2 However, it is incumbent on AOC, AWC and Part 141 certificate holders to determine the extent of flight crew RVSM training where that training has not been undertaken with the operator.
- 7.2.3 Operators conducting their own RVSM training should ensure that the training and checking system documentation and procedures contain the relevant training syllabi and other appropriate material. This will ensure that the operating practices and procedures and training items related to operations in RVSM airspace are incorporated in initial and recurrent training programs (training for operations control or dispatch personnel should be included, where appropriate).
- 7.2.4 For operators using an external training provider, sufficient information should be provided to demonstrate that their flight crew's knowledge of RVSM operating practices and procedures is sufficient to ensure RVSM airspace operational competency.
- 7.2.5 Irrespective of where the training is provided, practices and procedures in the following subject areas should be addressed:
- flight planning
 - pre-flight procedures at the aircraft for each flight
 - procedures prior to RVSM airspace entry
 - in-flight procedures.
- 7.2.6 Flight crew and other relevant staff (operations controllers, flight dispatchers etc, where used) should be knowledgeable on contingency and other procedures unique to specific areas of operation.
- 7.2.7 For Part 91 only operations, flight crew of aircraft 'natively' designed and equipped to be operated in RVSM airspace can reasonably be taken to satisfy the RVSM training necessary to be granted the RVSM approval by virtue of completing the relevant aircraft type rating training. Where an aircraft is modified with equipment to become RVSM capable, demonstrating that the relevant training has been conducted can be more difficult and therefore pilots may need to undertake bespoke RVSM training via a flight training provider.
- 7.2.8 For RVSM capable aircraft that are not subject to type rating training, such as class-rated aircraft, the onus or responsibility for ensuring theory and practical training in RVSM operations

relevant to the aircraft rests with the operator, including when the operator is the PIC, such as in the Part 91 operation case.

7.3 Competency for operations in RVSM airspace

7.3.1 AOC, AWC and Part 141 certificate holders

- 7.3.1.1 Operators are required to ensure that flight crew assigned to duty for a flight are competent to conduct the required operations. In addition to competency for operations generally, operations in RVSM airspace should be among the matters that are specifically addressed in initial and recurrent training and specified accordingly in the appropriate training and checking documentation of the operator.

7.3.2 Part 91 operations

- 7.3.2.1 The competency requirements for a Part 91 operation in RVSM airspace, relies on the general competency provisions prescribed in regulation 61.385 of CASR and the Part 61 Manual of Standards.

8 Processes for gaining a RVSM approval

8.1 Overview

8.1.1 For an RVSM approval to be issued, 2 aspects must be satisfied:

- the aircraft must be eligible for operations in RVSM airspace
- the operator must be capable.

8.1.2 For an operator that holds an AOC, AWC or Part 141 certificate, CASA issues all approvals granted to an operator under a specific CASR part in a single legal instrument to reduce administrative overheads and enable operators to have a complete picture of all approvals they hold under each specific CASR part.

8.1.3 For operator who do not hold an AOC, AWC or Part 141 certificate, an RVSM approval will be issued as a specific legal instrument that only contains the RVSM approval for the aircraft.

8.2 Eligibility criteria

8.2.1 To be eligible for an Australian RVSM approval, the following requirements must be satisfied:

- the aircraft must be eligible for operations in RVSM airspace
- the registered operator must have appropriate continuing airworthiness procedures to ensure the aircraft remains compliant with its approved RVSM configuration and is suitable for operations in RVSM airspace
- the operator must have or provide appropriate flight crew procedures
- where necessary under the relevant parts, an AOC, AWC or Part 141 certificate holder must provide training for operations in RVSM airspace
- the registered operator must ensure the aircraft participates in RVSM monitoring programmes.

8.2.2 More information can be found:

- about aircraft eligibility for operations in RVSM airspace (including continuing airworthiness aspects) — in chapter 4
- about operations in RVSM airspace and flight crew training matters — in chapter 3 and chapter 7
- about the Australian RVSM performance monitoring program — in chapter 2.

8.3 RVSM approval process

8.3.1 Applications for RVSM approval must be submitted in writing to CASA using the form provided on the CASA website. The application form Navigation Authorisation - RVSM application is to be used. Applicants are encouraged to complete this form through myCASA, with a PDF download of the form, at the time of publishing this AC, still also available at: <https://www.casa.gov.au/navigation-authorisation-rnp-ar-and-rvsm>. Details of the administration of applications that can be found at: [Apply for navigation approval | Civil Aviation Safety Authority \(casa.gov.au\)](#).

- 8.3.2 Applications must be accompanied by written evidence about how the applicant meets the eligibility requirements as summarised above, with the application form checklist specifying the required evidence.
- 8.3.3 The CASA Navigation authorisations (OPS.04) - protocol suite contains additional guidance on the matters to be assessed. It can be found at: [Navigation authorisations \(OPS.04\) - protocol suite | Civil Aviation Safety Authority](#).

Appendix A

Summary by operational CASR part

Key interpretation:

RVSM should be understood as a single approval held by the operator for a specific aircraft. The definition of operator determines who is required to hold that approval. The PIC retains specific responsibilities when operating in RVSM airspace; however, this does not create a separate personal RVSM approval for the pilot.

Operational CASR part / operation type	Who is the “operator” for this RVSM rule?	What approval is needed for RVSM?	How they would operate in RVSM airspace	PIC responsibility / what the PIC needs	Practical note / caveat	Continuing airworthiness / maintenance program requirements
Part 91 — private, corporate or other non-AOC general operation	If the flight is not authorised by an AOC, Part 141 certificate or aerial work certificate, the operator is the person, organisation or enterprise engaged in the aircraft operation. In a private hire/rental case, this may be the hirer/PIC, the company/club, or another organisation	The relevant Part 91 operator needs a regulation 91.045 RVSM approval for an individual aircraft to declare RVSM capability on the aircraft flight plan, with non-RVSM aircraft only allowed to operate in RVSM airspace by an ATC clearance or instruction.	Confirm the aircraft is included in the operator’s RVSM approval; declare RVSM capability on the relevant flight plan; operate under the approved RVSM procedures; ensure required equipment/configuration, continuing airworthiness, altimetry checks, MEL limitations and	PIC must ensure the RVSM requirement is met before entering RVSM airspace: either the relevant Part 91 operator holds the regulation 91.045 approval for that aircraft, or ATC has cleared/instructed the aircraft into RVSM airspace. PIC must be licensed/rated, competent in RVSM normal/contingency	This is the row most relevant to private hire. The approval follows the operator for that flight and the particular aircraft, not merely the aircraft owner’s paperwork if the owner is not the operator for the flight.	First identify the aircraft continuing airworthiness basis. If Part 42 applies or has been elected to be complied with, the aircraft must be maintained under an AMP. The AMP should be reviewed and, where necessary, varied to include or reference RVSM-related TC/STC/SB ICAs, maintenance

Operational CASR part / operation type	Who is the “operator” for this RVSM rule?	What approval is needed for RVSM?	How they would operate in RVSM airspace	PIC responsibility / what the PIC needs	Practical note / caveat	Continuing airworthiness / maintenance program requirements
	depending on who has operational control.	The approval is not transferable with the aircraft.	contingency procedures are satisfied; PIC informs ATC if unable to operate with RVSM separation.	procedures, verify required equipment/altimetry/MEL status, follow the applicable RVSM procedures, maintain assigned level, and advise ATC as soon as practicable if unable to operate with RVSM separation.		tasks, configuration controls, inspections, intervals, defect/MEL control, test-equipment and calibration requirements. If Part 42 does not apply and has not been elected to be complied with, the applicable CAR pathway applies: Class A aircraft use an approved system of maintenance, while Class B aircraft use a maintenance schedule — manufacturer’s schedule under CAR 42A, CASA Schedule 5 under CAR 42B, or an approved system of maintenance. RVSM items should be added or clearly identified where they

Operational CASR part / operation type	Who is the "operator" for this RVSM rule?	What approval is needed for RVSM?	How they would operate in RVSM airspace	PIC responsibility / what the PIC needs	Practical note / caveat	Continuing airworthiness / maintenance program requirements
						are not already covered.
Part 121 — Australian air transport operations in larger aeroplanes Part 135 — Australian air transport operations in smaller aeroplanes Part 138 — Aerial work operations Part 141 — flight training, non-integrated/single-pilot training Part 142 — integrated/multi-crew/contracted training	The AOC, AWC or Part 141 certificate holder is the operator because the operation is authorised by a certificate.	The certificate holder must hold a regulation 91.045 RVSM approval for each aircraft (note multiple aircraft could be included on a single approval) intended to declare, on a flight plan or to ATS, RVSM airspace capability. Aircraft not included in an RVSM approval can only enter RVSM airspace if specifically cleared or instructed by ATS. Simulator-only training does not require an RVSM airspace approval because no aircraft is being flown in RVSM airspace.	Include RVSM procedures in the exposition / operations manual; ensure crew training / checking / authorisation, dispatch / MEL control, maintenance control, height-keeping / altimetry monitoring and abnormal / contingency procedures are in place. Training exercises must comply with RVSM procedures and ATC requirements. For simulator RVSM training, the operator may train procedures, but it is not the same as holding operational	PIC operates under the certificate holder's RVSM approval and procedures. PIC must be trained / checked / authorised under the operator's system, ensure pre-flight RVSM serviceability and dispatch / MEL requirements are met, comply with altimetry cross-check and contingency procedures, and notify ATC promptly if RVSM capability is lost or degraded. For ferry / positioning flights, confirm whether the flight remains under the certificate holder's operation or another Part 91 operator.	Part 121 is usually the clearest case: the airline/operator holds the approval, the approved aircraft are identified, and pilots operate under that operator's system. For Part 135, RVSM is common for pressurised turbine aircraft. The aircraft may be technically RVSM-capable, but the Part 135 operator still needs the operator-held approval for that aircraft. Aerial work is often conducted at altitudes below RVSM airspace however ferry / positioning or	Scheduled Part 121 and 135 aircraft are managed under Part 42 and maintained in accordance with an AMP. For unscheduled Part 121 or 135 operations, Part 42 may apply if elected. Where Part 42 applies, RVSM continuing airworthiness should be controlled through the AMP and the CAMO / exposition system. The AMP should be reviewed and, where necessary, varied to include or reference any RVSM-related ICAs, configuration controls, inspections, intervals,

Operational CASR part / operation type	Who is the “operator” for this RVSM rule?	What approval is needed for RVSM?	How they would operate in RVSM airspace	PIC responsibility / what the PIC needs	Practical note / caveat	Continuing airworthiness / maintenance program requirements
			approval for an aircraft flight.		specialised operations could involve the use of RVSM airspace. Identify whether the flight is actually under the aerial work certificate. Do not treat a student/pilot as holding the RVSM approval. The certificate holder is the operator when the training operation is authorised by the certificate.	MEL / defect control, test-equipment and calibration requirements. If Part 42 does not apply and was not elected, the equivalent control should be through the applicable Class A system of maintenance or Class B maintenance schedule pathway. Where the aircraft is to be operated in RVSM airspace, add or identify RVSM-related ICAs, maintenance tasks, intervals, configuration control, MEL/defect control, altimetry/static/autopilot checks, test-equipment and calibration requirements.

Operational CASR part / operation type	Who is the “operator” for this RVSM rule?	What approval is needed for RVSM?	How they would operate in RVSM airspace	PIC responsibility / what the PIC needs	Practical note / caveat	Continuing airworthiness / maintenance program requirements
						Simulator-only training does not create an aircraft maintenance-program requirement.