Element Performance Inspection (EPI) Data Collection Tool
1.3.19 Lower Landing Minimums (LLM) (AW)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To provide in the inspection and maintenance program, policy, procedures, instructions and information to maintain authorized aircraft systems and equipment used in the Lower Landing Minimums (LLM) program (Categories I, II and III).

Objective (FAA oversight):

- To determine the effectiveness of the certificate holder s procedures in meeting the desired output of the program.
- To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the Lower Landing Minimums (LLM) program.
- To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the Lower Landing Minimums (LLM) program.

Specific Instructions:

- To accomplish this EPI the inspector shall verify the certificate holder follows its policies and procedures for Lower Landing Minimums (LLM) program. The inspector shall verify that only trained and qualified personnel perform maintenance on LLM aircraft. The inspector shall verify technical data being used for LLM is current. The inspector shall verify the certificate holder reports all system failures/abnormalities with the LLM system to the FAA/Certificate Holding District Office, if applicable.

Related EPIs:

- 1.1.1 Aircraft Airworthiness (AW)
- 1.2.1 Airworthiness Release / Logbook Entry (AW)
- 1.2.3 Maintenance Log / Recording Requirements (AW)
- 1.3.1 Maintenance Program (AW)
- 1.3.7 Outsource Organization (AW)
- 1.3.14 General Maintenance Manual / Equivalent (AW)
- 1.3.15 Reliability Program (AW)
- 1.3.21 Parts Pooling (AW)
- 1.3.22 Parts Borrowing (AW)
- 4.2.1 Maintenance Training Program (AW)

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:

  119.43(b)
  119.43(b)(1)
  119.43(b)(2)
  119.43(c)
  119.49(a)(5)

- SRRs:

  121.135(a)(1)
  121.135(b)(1)
  121.135(b)(2)
  121.135(b)(3)
  121.367
  121.369(b)
  121.567
  91.189(g)
  91.205(a)
  91.205(d)
  91.205(d)(1)
  91.205(d)(2)
  91.205(d)(3)(i)
  91.205(d)(4)
  91.205(d)(5)
  91.205(d)(6)
  91.205(d)(7)
  91.205(d)(8)
  91.205(d)(9)
  C.052
  C.053
  C.059
  C.059c
  C.059c(1)
  C.059c(2)
  C.059d
  C.060
  C.060(b)(1)
  C.060(b)(2)
  C.060(b)(3)
  C.060(b)(4)
  C.060a
  C.061
  C.062
  C.063
  C.073

Related CFRs & FAA Policy/Guidance:

- Related CFRs:

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- FAA Policy/Guidance:

  AC 120-29A
  AC 120-28D

EPI Section 1 - Performance Observables	
Objective: The tasks and questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder follows its written procedures and controls and meets the established performance measures of the process. To accomplish this, questions have been generated to test both the outputs of the process as well as the process itself. Question 1 and its following subquestions are directed at the output(s) of the process, whereas questions 2-6, when answered, should be directed at the process itself.	
Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the certificate holder's policies, procedures, instructions, and information for the Lower Landing Minimums (LLM) program.
3.	Review the last accomplished associated safety attribute inspection (SAI) for this element with emphasis on the controls, process measurements, and interface attribute section responses.
4.	Observe the certificate holder's Lower Landing Minimums (LLM) program to gain an understanding of the procedures, instructions and information.
5.	Discuss the Lower Landing Minimums (LLM) program with the personnel (other than management) who perform the duties and responsibilities required by the program.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Determine whether the following performance measures were met:	
1.1.	Were the certificate holder's personnel trained and qualified for the maintenance and inspection of aircraft, appliances, systems, and parts thereof that were approved by Category I, II, or III (Lower Landing Minimum)? *Related Performance JTIs:* 1. Check at the air carrier specified location that all observed LLM authorized personnel are fully informed about LLM procedures, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.375 2. Check at the air carrier specified location that all observed LLM authorized personnel are fully informed about LLM new equipment, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.375 3. Check at the air carrier specified location that all observed LLM authorized personnel are following instructions for LLM inspection program and other maintenance, preventive maintenance, and alterations while company person are performing work, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.367(a) 4. Check at the air carrier specified location that all observed LLM authorized personnel are following instructions for LLM inspection program and other maintenance, preventive maintenance, and alterations performed by outside organization or persons, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.367(a) 5. Check at the air carrier specified location that all observed LLM	☐ Yes ☐ No, Explain

	authorized personnel are competent and have adequate facilities and equipment to perform LMM maintenance, preventive maintenance, and alterations, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.367(b) 6. Check at the air carrier operated maintenance facility that the maintenance personnel are familiar with the operators approved LLM program and their individual responsibilities in accomplishing that program, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, a AC 120-28D Section 9.2, a 7. Check at the air carrier specified location that the LLM maintenance program address procedures necessary to ensure continued airworthiness relative to low visibility operations, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, b (1) AC 120-28D Section 9.2, b (1) 8. Check at the air carrier specified location that the certificate holder assures that the operator and contract maintenance personnel including mechanics, maintenance controllers, avionics technicians, personnel performing maintenance inspection or quality assurance, or other engineering personnel if applicable, receive initial and recurrent LLM training, in accordance with the Certificate Holder's design.. *Sources:* AC 120-29A paragraph 9.3 (a) AC 120-28D Section 9.3 9. Check at the air carrier specified location that the certificate holder assures that recurrent LLM training is accomplished at least annually, or when a person has not been involved in the maintenance of the specified aircraft or systems for an extended period (e.g., greater than 6 months), in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (a) AC 120-28D Section 9.3 10. Check at the training center that the certificate holder ensures LLM systems training include outside vendors or vendor's parts compatibility to program requirements and for establishing measures to control and account for parts overall quality assurance, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(3) AC 120-28D Section 9.3(3) 11. Check at the training center that the certificate holder ensures LLM systems training includes the installation, evaluation, control, and testing of system and component software changes or updates, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(7) AC 120-28D Section 9.3(7)	
1.2.	Were the inspections on the certificate holder's critical Category I, II, or III (Lower Landing Minimum) aircraft, appliances, systems, and parts thereof performed to ensure the airworthiness of each? *Related Performance JTIs:* 1. Check at the air carrier specified location that the certificate holder revises and updates the LLM maintenance program, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, b (2) AC 120-28D Section 9.2, b (2) 2. Check at the air carrier operated maintenance facility that the certificate holder performs one satisfactory low visibility system operational use, or a satisfactory systems ground check, within 6 months, or within a period as specified by the aircraft or avionics manufacturer for an aircraft to	☐ Yes ☐ No, Explain

	remain in LLM status, in accordance with the Certificate Holder's design.. *Sources:* AC 120-29A Paragraph 9.2, b (15) AC 120-28D Section 9.2, b (15) 3. Check at the training center that the certificate holder ensures LLM systems training includes the tracking and control of components that are "swapped" between systems for trouble shooting when systems discrepancies can not be duplicated. These procedures should provide for total system testing and/or removal of aircraft from lower minimum status, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(4) AC 120-28D Section 9.3(4) 4. Check at the air carrier operated maintenance facility that the certificate holder assures that LLM test equipment is periodically re-evaluated using a listing of primary and secondary standards, which are traceable to a national standard or the manufacturer's calibration standards, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.4 AC 120-28D Section 9.4	
1.3.	Were appropriate standards maintained for the certificate holder's Category I, II, or III (Lower Landing Minimum) aircraft, systems, appliances, and parts thereof and included in the approved inspection and maintenance program? *Related Performance JTIs:* 1. Check at the air carrier specified location that the certificate holder verifies the certification configuration status for each aircraft brought into the LLM maintenance program, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (4) AC 120-28D Section 9.2, b (4) 2. Check at maintenance operational control, that the certificate holder ensures the downgrade of an aircraft low visibility capability status when maintenance has been performed by persons other than those trained, qualified and authorized, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, b (12) AC 120-28D Section 9.2, b (12)	☐ Yes ☐ No, Explain
2.	Were the certificate holder's policies, procedures, instructions, and information for the Lower Landing Minimums (LLM) program followed? *Related Performance JTIs:* 1. Check at the FAA location that the flag operator has operations specifications for LLM, in accordance the Certificate Holder's design. *Sources:* 119.49(a)(5); 121.135(b)(1) 2. Check at the FAA location that the domestic operator has operations specifications for LLM, in accordance the Certificate Holder's design. *Sources:* 119.49(a)(5); 121.135(b)(1) 3. Check at the FAA location that the supplemental operator has operations specifications for LLM, in accordance the Certificate Holder's design. *Sources:* 119.49(b)(5); 121.135(b)(1) 4. Check at the FAA location that operator's ops specs list the equipment required for CATEGORY II operations by aircraft make, model and series, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(26); C.059d	☐ Yes ☐ No, Explain

	5.	Check at the FAA location that operator's ops specs list the equipment required for CATEGORY III operations by aircraft make, model and series, in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(26); C.060a	
	6.	Check at the air carrier specified location that all observed LLM authorized personnel are following instruction and procedures for performing maintenance, preventive maintenance, and alterations of that certificate holder's airplanes, including airframes, aircraft engines, propellers, appliances, emergency equipment, and parts thereof. (LLM), in accordance with the Certificate Holder's design. *Sources:* 121.135(b)(16); 121.369(b)	
	7.	Check at the air carrier specified location that all observed LLM authorized personnel are releasing aircraft to service in an airworthy condition and aircraft has been properly maintained for operation under this part. *Sources:* 121.135(a)(1); 121.367(c)	
	8.	Check at the air carrier specified location that the certificate holder identifies modifications, additions, and changes which were made to qualify aircraft systems for the intended operation or minima, if other than as specified in the AFM, TC or STC, in accordance with Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (5) AC 120-28D Section 9.2, b (5)	
	9.	Check at the air carrier specified location that the certificate holder identifies maintenance requirements and log entries necessary to change minima status, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, b (6) AC 120-28D Section 9.2, b (6)	
	10.	Check at the aircraft that the LLM system status is placarded properly and clearly documented in the aircraft log book, in coordination with maintenance control, engineering, flight operations, and dispatch, or equivalent, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (11) AC 120-28D Section 9.2, b (11)	
	11.	Check at the air carrier operated maintenance facility that the certificate holder performs one satisfactory low visibility system operational use, or a satisfactory systems ground check, within 6 months, or within a period as specified by the aircraft or avionics manufacturer for an aircraft to remain in LLM status, in accordance with the Certificate Holder's design.. *Sources:* AC 120-29A Paragraph 9.2, b (15) AC 120-28D Section 9.2, b (15)	
	12.	Check at the air carrier specified location that the certificate holder assures that the operator and contract maintenance personnel including mechanics, maintenance controllers, avionics technicians, personnel performing maintenance inspection or quality assurance, or other engineering personnel if applicable, receive initial and recurrent LLM training, in accordance with the Certificate Holder's design.. *Sources:* AC 120-29A paragraph 9.3 (a) AC 120-28D Section 9.3	
	13.	Check at the training center that the certificate holder ensures LLM systems training includes the following subject areas: operational concepts, aircraft types and systems affected, aircraft variants and differences where applicable, procedures to be used, manual or technical reference availability and use, processes, tools, or test equipment to be used, quality control, methods for testing and return to service, and	

	signoffs required), in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(2) AC 120-28D Section 9.3(2) 14. Check at the training center that the certificate holder ensures LLM systems training includes assessment, tracking and control the accomplishment of changes to components or systems pertinent to low visibility operations, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(5) AC 120-28D Section 9.3(5) 15. Check at the training center that the certificate holder ensures LLM systems training includes a method to record and report lower minimum operation(s) that are discontinued/interrupted because of system(s) malfunction, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(6) AC 120-28D Section 9.3(6) 16. Check at the training center that the certificate holder ensures LLM systems training includes the minimum equipment list (MEL) remarks section, which identifies low visibility-related systems and components, specifying limitations, upgrading, and downgrading, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(8) AC 120-28D Section 9.3(8) 17. Check at the training center that the certificate holder ensures LLM systems training includes identifying and addressing performance assurance for any necessary low visibility-related components and systems, such as: use of "built in test" features, required inspection items, and providing quality assurance, whether performed in-house or by contract vendors, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A paragraph 9.3 (b)(9) AC 120-28D Section 9.3(9) 18. Check at maintenance operational control that the certificate holder upgrades or downgrades system status concerning low visibility operations, to ensure flightcrews, maintenance and inspection departments, dispatch, and other administrative personnel as necessary are appropriately aware of aircraft and system status, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.5, (a) AC 120-28D Section 9.5 19. Check at the air carrier operated maintenance facility that the certificate holder assures the appropriate level of testing is specified for each LLM component or system, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.5, (b) AC 120-28D Section 9.5 20. Check at the air carrier specified location that the certificate holder ensures contract facilities or personnel follow the operator's FAA-approved maintenance program to approve an aircraft for return to service, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.5, (c) AC 120-28D Section 9.5 21. Check at the Air Carrier specified location that the certificate holder ensures any modification to systems and components approved for low visibility operations are not adversely affected when incorporating software changes, service bulletins, hardware additions, or modifications, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.8 AC 120-28D Section 9.8	
3.	Were the Lower Landing Minimums (LLM) program controls followed? *Related Performance JTIs:* 1. Check at the air carrier specified location that the certificate holder identifies monitors, and reports lower minimum system and component	☐ Yes ☐ No, Explain

	discrepancies for the purpose of quality control and analysis, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.2, b (8) AC 120-28D Section 9.2, b (8) 2. Check at the air carrier specified location that the certificate holder defines, monitors, and reports chronic and repetitive LLM system discrepancies, in accordance with Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (9) AC 120-28D Section 9.2, b (9) 3. Check at the air carrier operated maintenance facility that the certificate holder performs LLM systems ground tests and systems flight checks, as applicable, following periodic maintenance, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (13) AC 120-28D Section 9.2, b (13) 4. Check at the Air Carrier operated maintenance facility that the certificate holder conduct periodic flight guidance system/autoland system checks IAW procedures recommended by the airframe or avionics manufacturer, or by an alternate procedure approved by the FAA, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.6, (b) AC 120-28D Section 9.6 5. Check at maintenance operational control that the certificate holder prescribes the periodic use of the flight guidance/automatic landing system to assist in maintaining its availability and reliability, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.6, (c) AC 120-28D Section 9.6	
4.	Did the records for the Lower Landing Minimums (LLM) program comply with the instructions provided by the certificate holder? *Related Performance JTIs:* 1. Check at the air carrier specified location that the certificate holder identifies, records, and designates personnel currently assigned responsibility in managing the LLM program, performing the program, maintaining the program, or performing quality assurance for the program. This includes identification of any contractor or sub-contractor organizations, or where applicable, their personnel, in accordance with Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (3) AC 120-28D Section 9.2, b (3) 2. Check at the FAA location that the certificate holder submits (for the 1 year period after an applicant has been authorized for LLM operations) a monthly summary to the certificate holding office, which includes the total number of approaches tracked, the number of satisfactory approaches tracked, by aircraft/system type, and visibility (RVR), if known or recorded, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.7.2 (a) AC 120-28D Section 9.7 (a) 3. Check at the FAA location that the certificate holder submits (for the 1 year period after an applicant has been authorized for LLM operations) a monthly summary to the certificate holding office, which includes the total number of unsatisfactory approaches, and reasons for unsatisfactory performance, if known, listed by appropriate category (e.g., poor system performance, aircraft equipment problem/failure; ground facility problem, ATS handling, lack of critical area protection, or other) , in accordance	☐ Yes ☐ No, Explain

	with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.7.2 (b) AC 120-28D Section 9.7 (b) 4. Check at the FAA location that the certificate holder submits (for the 1 year period after an applicant has been authorized for LLM operations) a monthly summary to the certificate holding office, which includes the total number of unscheduled component removals for the related avionics systems. *Sources:* AC 120-29A Paragraph 9.7.2 (c) AC 120-28D Section 9.7 (c) 5. Check at the FAA location that the certificate holder submits a LLM monthly summary to the certificate holding office, after the initial 1 year period, IAW the Operators established reliability and reporting requirements, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.7.2 (d) AC 120-28D Section 9.7 (d) 6. Check at the records repository that the certificate holder ensures suitable LLM records are retained, including the applicable records of contract maintenance organizations, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.9 (a) AC 120-28D Section 9.9 7. Check at the records repository that the certificate holder ensures contract maintenance organizations have appropriate LLM records, and instructions for coordination of LLM records with the operator, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.9 (b) AC 120-28D Section 9.9	
5.	Were the process measurements for the Lower Landing Minimums (LLM) program effective in identifying problems or potential problems and providing corrective action for them? *Related Performance JTIs:* 1. Check at the air carrier specified location that the certificate holder ensures aircraft remain out of lower minimum status until successful corrective action has been verified for chronic and repetitive discrepancies, in accordance with the Certificate Holder's design. . *Sources:* AC 120-29A Paragraph 9.2, b (10) AC 120-28D Section 9.2, b (10) 2. Check at the Air Carrier specified location that the certificate holder continuously assess or periodically evaluate aircraft system performance to ensure satisfactory operation for LLM systems, in accordance with the Certificate Holder's design. *Sources:* AC 120-29A Paragraph 9.6, (a) AC 120-28D Section 9.6	☐ Yes ☐ No, Explain
6.	Did personnel properly handle the associated interfaces by complying with other written policies, procedures, instructions, and information that are related to this element?	☐ Yes ☐ No, Explain

EPI Section 1 - Performance Observables Drop-Down Menu
1. Personnel.
2. Tools and Equipment.
3. Technical Data.
4. Procedures, policies or instructions or information.
5. Materials.
6. Facilities.
7. Controls.
8. Process Measures.
9. Interfaces.
10. Desired Outcome.
11. Other.

EPI Section 2 - Management Responsibility & Authority Observables	
Objective: The questions in this section address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process.(The person with the authority may or may not be the person with the responsibility.)	
Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
	NOTE: If no personnel or major program changes (as defined by the principal inspector (PI)) affecting the responsibility or authority attributes for this element have occurred since the last SAI and/or EPI was accomplished, then do not perform tasks 3-6, below. Answer questions 1 and 2, and provide the name/title.
1.	Identify the person who has overall responsibility for the Lower Landing Minimums (LLM) program.
2.	Identify the person who has overall authority for the Lower Landing Minimums (LLM) program.
3.	Review the duties and responsibilities for the person(s) who manage the Lower Landing Minimums (LLM) program.
4.	Review the appropriate organizational chart.
5.	Discuss the Lower Landing Minimums (LLM) program with the management personnel identified in tasks 1 and 2.
6.	Evaluate the qualifications and work experience of the management personnel identified in tasks 1 and 2.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identified person who is responsible for the quality of the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain Name/Title:
2.	Is there a clearly identified person who has authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain Name/Title:
3.	Does the responsible person know that he/she has responsibility for the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change
4.	Does the person with authority know that he/she has authority for the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change
5.	Does the person with responsibility for the Lower Landing Minimums (LLM) program meet the qualification standards?	☐ Yes ☐ No, Explain ☐ No Change
6.	Does the person with authority to establish and modify the Lower Landing Minimums (LLM) program meet the qualification standards?	☐ Yes ☐ No, Explain ☐ No Change

7.	Does the person with responsibility understand the controls, process measurements, and interfaces associated with the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change
8.	Does the person with authority understand the controls, process measurements, and interfaces associated with the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change
9.	Does the responsible person know who has authority to establish and modify the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change
10.	Does the individual with authority know who has the responsibility for the Lower Landing Minimums (LLM) program?	☐ Yes ☐ No, Explain ☐ No Change

EPI Section 2 - Management Responsibility & Authority Observables Drop-Down Menu
1. Assignment of responsibility.
2. Assignment of authority.
3. Does not understand procedures, policies or instructions and information.
4. Does not understand controls.
5. Does not understand process measurements.
6. Does not understand interfaces.
7. Span of control.
8. Position vacant.
9. Other.