Corporate Aviation
Safety Management System
Dear aviation colleague,

This guide was developed to facilitate the implementation of an effective, yet practical, safety management system (SMS). Although some discussion continues about what an SMS consists of and who actually needs one and when, it is fair to say that the current industry standard for a corporate flight department safety program consists of the following elements as a minimum:

1. A process to report an incident (reactive)
2. A process to analyze each hazard and to determine the risk level,
3. A process to mitigate the hazard,
4. A process to evaluate effect of the corrective action,
5. Documentation of the complete process

A more complete safety program would also offer:

1. A process to submit suggestions to improve safety (proactive)
2. A process to self-audit the organization using industry recognized standards
3. A process to ensure current industry safety information is distributed to the group
4. A process to ensure all employees receive required and continual safety training
5. A plan to describe how the organization will respond to an emergency or aircraft accident

What I have just described is essentially the enclosed Safety Management System. Because processes are at the heart of the approach, it is called a system in lieu of a program. The following references were considered and applied as appropriate when developing this SMS:

1. National Business Aviation Association (NBAA) safety program guidance
2. International Standards for Business Aircraft Operations (ISBAO)

Note: Transport Canada has done an exceptional job providing clear guidance. This may be due to the fact that the agencies driving SMS implementation, both the International Business Aircraft Council (IBAC) and the International Civil Aviation Organization (ICAO) are headquartered in Canada.

We are ultimately here to help you succeed. Therefore, please feel free to contact me if you need any assistance.

Sonnie G. Bates  
Co-Founder, Corporate Aviation Solutions
How to Implement Your SMS

When considering how much effort is needed to implement your SMS, keep in mind that “Safety is a journey, not a destination”. Commit to making small continuous corrections in your department throughout the year. The following steps are provided to facilitate the implementation of your SMS.

1. Appoint a person to be the Safety Manager (SM). Make it official by using the appointment letter (Included).

2. Steps for the newly appointed SM:
   - View the SMS training program provided.
   - Establish a safety bulletin board. Keep the board “alive” with new materials. However, it should always display an OSHA poster for employee rights and employer responsibilities. (Posters included).
   - Implement an Incident Reporting / Hazard Identification process (form included).
   - Implement a Safety Information File (sample included) to alert personnel of relevant safety information. Update the file with pertinent information regularly.
   - Find hazards by soliciting suggestions, facility inspections, and self audits.
   - Create training folders for all employees to document OSHA training (sample included – make copies as needed for each of your aviation team members).
   - Send a message to the aviation team about the implementation of the SMS and the key elements involved. (Sample message included)
   - Conduct quarterly reviews which include status of investigations, audits, open hazards, suggestions submitted, facility inspection findings, and training status. Discuss strategies and goals to include milestones and projected dates. A Sample quarterly review is included.
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1.0 Safety Management Plan

1.1 Safety Policy

Safety is a core business value, and a fundamental component of our competitive advantage. Our organization is strengthened by making continuous safety improvements and excellence an integral part of all our activities.

All managers and employees are responsible and accountable for their actions and safety performance, starting with myself as CEO and the Aviation Manager. I endorse all personnel to think and work safely at all times, regardless of any real or perceived pressures to do otherwise.

To prevent accidents and to eliminate damage or injury, we have implemented and maintain an active safety management system (SMS). Our objective is the proactive management of identifiable hazards, the reduction of risk to a level as low as reasonably practicable, and the sharing of safety information with our stakeholders.

Signed: ______________________________

Chief Executive Officer
1.2 Non-Punitive Safety Reporting Policy

Our organization fully supports and encourages a culture of openness and trust between all personnel. This cannot be achieved unless employees feel able to report occurrences or hazards without the fear of unwarranted retribution. Reporting occurrences or hazards should become a priority for all employees.

Only with full awareness can management rectify deficiencies in a timely manner. Employees are encouraged to identify and report unsafe conditions without fear of recrimination. The organization’s primary goal is identification of any unsafe condition that exists within, or may affect, the organization.

Personnel reporting safety-related issues to the organization will not be subject to punitive discipline, regardless of whether they were personally involved in the observation giving rise to the safety concern.

The only cases where disciplinary action will be taken are for:

• negligence;
• willful or intentional disregard;
• criminal intent; and
• use of illicit substances.
1.3 Roles and Responsibilities

We ensure that all SMS roles and responsibilities and employee involvement are identified, communicated, documented and periodically evaluated to ensure they are appropriate and functioning within all levels of the organization.

In addition to safety responsibilities associated with our day-to-day operations, the Aviation Manager, Safety Manager and employees have additional responsibilities associated with the operation and maintenance of our SMS.

The Aviation Manager is responsible for:

- establishing and implementing the SMS;
- ensuring the required safety resources are available;
- establishing and adhering to the corporate safety policy;
- promoting and supporting the SMS; and
- ensuring that the SMS remains effective.

The Safety Manager is responsible for:

- managing the operation of the SMS;
- collecting and analyzing safety information in a timely manner;
- monitoring and evaluating the results of corrective actions;
- ensuring that risk assessments are conducted when applicable;
- determining the adequacy of training;
- authority to delegate specific SMS tasks/roles to persons within the organization;
- ensuring that periodic reviews are conducted to determine the effectiveness of the system;
- monitoring the industry for safety concerns that could affect the program; and
- ensuring safety-related information, including organization goals and objectives, are made available to all personnel through established communication processes.

Employees are responsible for:

- following established safe working practices;
- immediately dealing with any unsafe condition, as practical;
- identifying and reporting all occurrences, hazards, operational irregularities, unsafe conditions or practices in a timely manner; and
- being familiar with the organization’s SMS.
1.4 Communication

To facilitate the operation, maintenance and effectiveness of our SMS, we will communicate, share, and review safety-related information through meetings, electronic and written documentation with the following:

- **Internal:**
  - quarterly (or as required) safety meetings to review reports;
  - face-to-face on an individual or group basis;
  - organization memos;
  - safety bulletin board; and
  - amendments to documentation.

- **Regulatory Agencies:**
  - participation in relevant and accessible safety-related forums.

- **Industry:**
  - participation in relevant and accessible safety-related forums;
  - other organizations and associations; and
  - manufacturers.

- **Clients:**
  - safety briefings;
  - safety cards; and
  - customer feedback.
1.5 Safety Planning Objectives and Goals

The aim of establishing attainable objectives and goals is to ensure the effectiveness and continuous improvement of safety. Annually, objectives and goals will be reviewed and updated in accordance with our performance measurement and management review processes. These reviews will also confirm that the organization objectives and goals are linked. The process for establishing goals includes review of the following:

- Strategic plan;
- results of internal audits; and
- occurrence and hazard reports.

Our current objectives and goals are:

- **Objective A: Reduce hazards and associated risks.**
  - Goal 1: Receive an increased percentage (5 percent) of existing latent hazards annually through increased reporting.
  - Goal 2: Increase the number of occurrence reports received by 5 percent.

- **Objective B: Continue to enhance the development of effective corrective action plans.**
  - Goal 1: Provide additional training to SMS manager.
  - Goal 2: SMS manager will provide additional SMS training to other personnel.

- **Objective C: To reduce losses through a reduction in the number and severity of accidents and incidents.**
  - Goal 1: Increase the number of occurrence reports received by 5 percent.
  - Goal 2: Provide first responder and fire extinguisher training to those who do not already have it.
1.6 Performance Measurement and Management Review

Annually, management reviews data from various sources to measure safety performance, assess SMS effectiveness and verify continuous improvement.

Components of the process include:

- identifying trends through data analysis and information sharing;
- evaluating effectiveness of corrective actions;
- updating safety objectives and goals;
- monitoring and updating safety performance measures;
- allowing for risk-based allocation of resources;
- reviewing quality issues; and
- reviewing the Emergency Response Plan.

Our safety performance measures for this year are:

- number of hazards identified this year vs. previous years;
- number of incident and accident reports received this year vs. previous years;
- provision of SMS training to organization personnel;
- reduction in injuries this year vs. previous years; and
- reduction in damage to property this year vs. previous years.
2.0 Documentation

2.1 Identification and Maintenance of Applicable Regulations

The purpose of identifying and maintaining applicable regulations is to ensure that we understand our legal responsibilities. The person responsible for safety will ensure the following process is followed:

- Bi-annual review of FARs and Standards, including applicable exemptions, and act upon change as appropriate;
- When received, additional safety regulations, such as FARs, OSHA or EPA will be reviewed and acted upon as applicable; and
- Pertinent regulatory and technical information is available to all personnel through their applicable departments.
2.2 SMS Documentation and Records Management

By documenting and managing associated records, we ensure all personnel remain informed and involved with our SMS. The person responsible for the SMS maintains two types of SMS documents and records:

- description of SMS policies, processes, and procedures; and
- records or outputs from these processes.

The following policy, process and procedure documents are kept in a location easily accessible by all personnel and are updated as required:

- SMS manual;
- maintenance control manual; and
- company operations manual.

Records and output (information gathered through the SMS) will be stored in a secure filing cabinet and kept for a minimum of two audit cycles.

The SMS manual will be kept with our other required manuals and updated as required. Information in the SMS manual is reviewed during the annual internal quality assurance audit. Additionally, information in the SMS manual is reviewed on an as-required basis, i.e. to identify issues and trends between audit intervals. Information recorded in the SMS manual will be stored for a period of two audit cycles.
3.0 Safety Oversight

3.1 Incident Reporting and Hazard Identification

As a component of our continuous safety improvement process, we maintain an occurrence/hazard reporting system (reactive/proactive) to collect and analyze data and carry out investigations. All reports will be dealt with in confidence. Self-identified reporters will receive a response acknowledging their submission within 5 days, and an update within 30 days or upon process completion. The process is described in detail below.

When an incident occurs or a hazard is identified, this must be documented by completing the INCIDENT REPORT AND HAZARD IDENTIFICATION FORM located in the Appendix.

The process is as follows:

- Reporter completes the first and second sections of the form and submits it to the person responsible for safety.
- The person responsible for safety leads the investigation / analysis and completes the remaining sections of the form.
  - A risk assessment is required when:
    - Trend analysis shows that previous corrective actions have not resolved similar concerns;
    - it is not clear what the root cause is;
    - the issue is complex;
    - the potential loss is severe; or
    - the person responsible for safety or other personnel feel it is necessary.
- When the form is completed, relevant documentation will be filed and saved for a minimum of two audit cycles.
- This information will be used as part of our performance measurement and management review process.

The following must be reported:

- any incident or accident involving injury to personnel or damage to equipment or facilities;
- any incident or accident involving injury non-organization personnel or damage to equipment or facilities, resulting from organization operations.
3.2 Investigation and Analysis

The ability to investigate, analyze and identify the cause or probable cause of hazards and occurrences documented through the SMS is an important component of our continuous safety improvement process. Investigation and analysis are components of the reactive, proactive and risk-management processes. Details can be found in those sections.

The person responsible for safety will lead the investigation and analysis of occurrences and hazards to:

- determine the cause;
- develop and implement corrective or preventive actions; and
- evaluate corrective actions to make sure they are effective.

3.3 Risk Management

The ability to identify hazards and assess risk associated with hazards is an important component of our continuous safety improvement process. If it is determined that a risk assessment is required, the person responsible for safety will conduct and document the process by utilizing the RISK MATRIX located in the appendix.

The risk-management process is as follows:

A. the hazard or occurrence is identified;
B. the associated risks are determined;
C. the probability or severity risk rating is determined;
D. risk control strategies, including timelines, are developed and a revised risk rating is determined;
E. risk control strategies are implemented;
F. implemented risk controls are assessed;
G. when the process has been completed, the SMS file is updated with a narrative of the results; and
H. the completed forms are stored in a secure location.
4.0 Training

4.1 SMS Training, Awareness, and Competence

In order to meet SMS training requirements we have implemented the following:

• Initial SMS training:
  o The person responsible for safety will receive SMS training; and
  o The person responsible for safety will provide all organization personnel with an initial training session on the SMS.

• Update SMS training:
  o When regulatory changes have been identified, such changes will be reviewed and incorporated, if applicable, and the SMS program will be updated as required;
  o Once each year, or as required, all personnel will receive update training to include
    • information on changes to the SMS; and
    • a review of all reported occurrences and hazards, including recommended mitigations and corrective or preventative actions.

• Additional SMS training:
  o Where it is shown to be necessary by findings identified during the internal quality assurance audit, additional training will be undertaken; and
  o When any new requirement arises, for example new or modified equipment.

• Emergency preparedness and response training:
  o The person responsible for safety will ensure that all personnel are trained in, and aware of, their duties and responsibilities within the organization’s Emergency Response Plan; and
  o The organization has briefed local emergency service providers on its operation, and participates in emergency response exercises.

• Training records:
  o A record of all training completed will be kept in personnel files.
5.0 Quality Assurance

5.1 Operational Quality Assurance (QA)

In order to meet SMS QA requirements, we have implemented the following:

- Existing independent audit procedures will continue to be followed;

- The organization has added applicable SMS components to existing annual internal audit checklists, to include:
  - Safety policy;
  - Non-punitive reporting policy;
  - Roles, responsibilities and employee involvement;
  - Communications;
  - Performance measurement and management review;
  - Identification and maintenance of applicable regulations;
  - SMS documentation and records management;
  - Reactive and proactive processes, investigation and analysis;
  - Risk management;
  - Training;
  - Emergency preparedness and response; and
  - Review of safety critical functions.

- Additional SMS audit component training will be provided as required
6.0 Emergency Preparedness

6.1 Emergency Preparedness and Response

The organization recognizes that even the safest organizations can suffer loss. In order to reduce human suffering and property damage after an accident or serious incident has occurred, the organization has developed an Emergency Response Plan (ERP).

The ERP is:

- periodically examined as part of the management review;
- communicated and distributed to all organization and flight watch personnel and local emergency response authorities;
- exercised in co-operation with local authorities on an annual basis;
- updated as required by exercises and reviews; and
- a required training item for all personnel who may be involved in the event of an emergency.
Incident Report and Hazard Identification Form

Date: __________________ Time: __________ Location: ____________________________

A. Description of incident or observed hazard: (Include a detailed and accurate description while being as concise as possible.)

B. Recommended Corrective Action:

Name: __________________________ Date: __________________

C. Analysis and Risk Assessment:

Tracking #: __________________________ Initial Risk Code: __________________________

D. Corrective Action Taken:

Date: __________________________ New Risk Code: __________________________

INSTRUCTIONS: Fill out A and B (shaded section) using additional sheets as necessary. Forward to the Safety Manager. Thank you for your interest in our Safety Program.
This risk matrix is designed to help determine the level of risk for a particular hazard by providing objective criteria relating to probability and severity.

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**Values | Risk Levels | Action**
---|-------------|------------------
1–5 | Low | Proceed after considering all elements of risk
6–12 | Medium | Continue after taking appropriate mitigating action.
13–25 | High | STOP: do not proceed until sufficient control measures have been implemented to reduce risk to an acceptable level.

### Severity (S)

- **Level 1**: No damage or injury or adverse consequences.
- **Level 2**: Personnel—first aid injury; no disability or lost time
  - Public—minor impact
  - Environment—contained release
  - Equipment—minor damage; potential organizational slowdown or potential downtime
- **Level 3**: Personnel—lost time injury; no disability
  - Public—greater than minor impact, loss of confidence; some injury potential
  - Environment—small uncontained release
  - Equipment—minor damage; leads to organizational slowdown or minor downtime
- **Level 4**: Personnel—disability or severe injury
  - Public—exposed to a hazard that could or will produce injuries
  - Environment—moderate uncontained release
  - Equipment—major damage; results in major slowdown or downtime
- **Level 5**: Personnel—fatal, life-threatening injury
  - Public—exposed to life-threatening hazard
  - Environment—large uncontained release
  - Equipment—loss of critical equipment, or shutdown of organization

### Probability (P)

- **Level 1**: Mishap almost impossible.
- **Level 2**: Postulated event (may be possible, but not known to have occurred).
- **Level 3**: Has occurred rarely (known to have happened, but a statistically credible frequency cannot be determined).
- **Level 4**: May/has occur(ed) infrequently.
- **Level 5**: May/has occur(ed) frequently.
Memorandum for All Flight Department Personnel

From: ______________________________

Subject: Appointment of Aviation Safety Manager

_________________________________________ is hereby appointed as the flight department’s Aviation Safety Manager. The SM is responsible to ensure our Safety Management System (SMS) is effectively employed, as well as leading our team in achieving both short and long term safety goals. We are all responsible to understand essentials of our SMS and to promote safe maintenance and operations activities on a daily basis. Training and vigilance are critical to our success. Our goals for improving our safety processes will require leadership on behalf of all of us. Our commitment to providing the best possible service requires us to manage risks appropriately and this can only happen when everyone is actively engaged.

Signed: _______________________________               Date: ______________________________

Title: _______________________________
Memorandum for all Flight Department Personnel

From: Aviation Safety Manager
Subject: Implementing the Safety Management System

In an effort to improve the way we approach safety, we are implementing a Safety Management System (SMS). The SMS is a straight-forward, pragmatic program which involves activities that will directly enhance our effectiveness as an organization. The SMS consists of the following processes:

1. Incident reporting (reactive),
2. Hazard analysis and assignment of risk levels,
3. Corrective action implementation,
4. Evaluation of corrective action,
5. Documentation,
6. Suggestions for improving safety (proactive),
7. Self-auditing the organization using industry recognized standards,
8. Safety information distribution to the group,
9. Initial and continuation safety training,
10. Aircraft accident response

While these processes are being implemented, I will coordinate required training for each member so that each of us can have the necessary information to be an active participant in the SMS. Success requires us to be continuously vigilant to identify potential hazards. If you notice a hazard, please complete the shaded area of the attached Incident Report/Hazard Identification Form and forward it to me as soon as possible.

Thank You,

_________________________________________________
Aviation Safety Manager
Figure 2: The Basic Safety Process

Correct

Evaluate

Document

Not Resolved

Report

Safety concern, problem, hazard, occurrence

Analyze
Job Safety and Health
It’s the law!

EMPLOYEES:

• You have the right to notify your employer or OSHA about workplace hazards. You may ask OSHA to keep your name confidential.

• You have the right to request an OSHA inspection if you believe that there are unsafe and unhealthful conditions in your workplace. You or your representative may participate in that inspection.

• You can file a complaint with OSHA within 30 days of retaliation or discrimination by your employer for making safety and health complaints or for exercising your rights under the OSH Act.

• You have the right to see OSHA citations issued to your employer. Your employer must post the citations at or near the place of the alleged violations.

• Your employer must correct workplace hazards by the date indicated on the citation and must certify that these hazards have been reduced or eliminated.

• You have the right to copies of your medical records and records of your exposures to toxic and harmful substances or conditions.

• Your employer must post this notice in your workplace.

• You must comply with all occupational safety and health standards issued under the OSH Act that apply to your own actions and conduct on the job.

EMPLOYERS:

• You must furnish your employees a place of employment free from recognized hazards.

• You must comply with the occupational safety and health standards issued under the OSH Act.

This free poster available from OSHA – The Best Resource for Safety and Health
Figure 1: Evolution of the safety culture
From: Director of Aviation

Subject: Safety Information File (SIF) Implementation

To: All Aviation Department Personnel

Intra departmental communications concerning safe operations and maintenance activities is essential to our business. Although email is a convenient and efficient way to communicate messages on a daily basis, some operations and maintenance notices are better conveyed in a non-electronic method in order to: 1) protect the sensitivity of the message and 2) to formally institute and maintain record of a new policy affecting safety.

In such cases, these notices will be posted in a binder clearly labeled as the “Safety Information File” (SIF), which will be maintained by the Safety Manager. This binder will be readily accessible and located in an area where all department personnel frequently transit.

A signoff log is located in front of the binder for each person to initial when he/she has adequately reviewed the information.

Any member of the flight department may submit information to the safety manager for inclusion into the SIF. The safety manager will then coordinate with me for final approval before posting each notice.

Implementation of the SIF is a step in the right direction and recommendations for improving communication are always welcome.

Thank You,

_____________________________________
Director of Aviation
# Safety Information File Log Sheet

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