

Access to CVR Data for Maintenance Purposes

Whilst IFALPA opposes the use of CVR data for maintenance purposes, the Federation believes that the following requirements should be met if an individual State requires the use of inflight CVR recordings for maintenance:

- When a CVR recording is inspected for ensuring the CVR serviceability, the operator should ensure the privacy of the CVR recording, and the CVR recording should not be disclosed or used for other purposes than ensuring the CVR serviceability.
- When an inspection of the CVR recording is performed for ensuring audio quality and intelligibility of recorded communications:
 - the privacy of the CVR recording should be ensured (e.g. by locating the CVR replay equipment in a separated area and/or using headsets);
 - access to the CVR replay equipment should be restricted to specifically authorised persons;
 - provision should be made for the secure storage of the CVR recording medium, the CVR recording files and copies thereof;
 - the CVR recording files and copies thereof should be permanently erased not earlier than two months and not later than one year after completion of the CVR recording inspection, except that audio samples with no privacy content may be retained for enhancing the CVR recording inspection (e.g. for comparing audio quality);
- When CVR maintenance checks are performed by an external contractor, data should be sent encrypted.
- One possible way to ensure that neither the CVR audio file nor the transcript be disclosed is to carry out a spectrographic data analysis of the recording.
- A Protocol addressing all relevant aspects of these checks (such as written crew consent for each individual flight) should be signed by Management and Pilot Associations before engaging in CVR maintenance checks.
- Following all maintenance-related work the CVR recording should be permanently erased. In circumstances where the erasure of the CVR recording is not possible, then clear protective provisions must be developed between the operator, regulator, and pilot association to ensure no misuse or disclosure of the recording by any entity.