

# **Pilot Training & Airline Safety**

## **Senate Enquiry**

My name is Brad Coombe. I have 31 years of aviation experience as a charter pilot in the general aviation industry, as an airline pilot having flown six different jet aircraft types for domestic & international airlines & 17 years experience as a businessman in the aviation industry involved in aircraft maintenance, aviation software development & pilot training.

The world's airlines are rapidly evolving with the birth of the low cost carrier (LCC). More passengers than ever before are flying globally on a regular basis because flying in a jet has become more affordable thanks to the LCC! Passengers demand a relatively new aircraft to fly in and ticket prices they can afford. This has been achieved in Australia with the introduction of several Low Cost Carriers.

Legacy airlines (Old fashioned Hub & Spoke Airlines) need to adapt to this low cost model or face extinction in the near future.

After so many years of paying exorbitant airfares under the draconian Two-airline-Policy the Australian public is embracing air travel like never before!!

Politicians need to embrace the future of the LCC & need to work to ensure that a pilot training regime is adopted that ensures the future viability of the industry & secures future low cost air travel which is in the national interest.

The rise & rise of the LCC's is putting extreme pressure on the Airline Industry resources across all sectors primarily because there currently appears to be no end to the to the insatiable desire for the travelling public to fly more than ever before at prices they can afford.

The area under most pressure is demand for well trained pilots to crew all the new aircraft the LCC's are planning to add to their rapidly growing fleets.

Airline safety is paramount so Pilot training needs to be well managed! It starts NOT at the airline level but with the induction of suitable candidates at the front end when individuals step forward to train to become Commercial Pilots.

The airline industry to date has primarily employed pilots trained by Australia's 200+ general aviation flying schools, some of which have operated now for over 100 years. These flying schools are well experienced at producing high level candidates & "weeding out" those students that may not meet the demanding airline standards.

CASA are the governing body of pilot training in Australia & it is CASA that issues Pilot licences under the rigorous ICAO (International Civil Aviation Organisation) standards. The standard of Australian Pilots & the Australian Pilot licence has, for a long time now, been well recognised by airlines all over the world & Australian pilots are in high demand by many overseas carriers.

Unfortunately this high standard is being undermined as we speak. I will explain why in greater detail.

Historically budding Australian born pilots have had to pay for their own flying lessons. Those born on the wrong side of the tracks have had to work to fund their training. This has ensured that only those totally committed to being a pilot enter the industry. This has helped ensure the high standard of pilots has been maintained over the past 100 years.

The Howard government elected to make Vet Fee Help funding available to trainee pilots at the flight school level, with the Rudd Government subsequently implementing the program. To receive this funding Flying Schools are required to become Registered Training Organisations (RTO's) which gives them TAFE status & allows flying schools to hand out Diplomas at the completion of the students' training articulating into a University Degree at a later stage. The flight training industry got very excited and many schools made application for Vet Fee Help.

Two years later not one flying school in Australia has been awarded Vet Fee Help funding!

It is now clear that the Vet Fee Help for Australian Flying Schools is NOT workable and as some Universities in Australia recognise the Australian Commercial Pilot's Licence as a full credit for Year 1 of their Aviation Degrees, completely unnecessary.

The down side is that Flying Schools have subsequently learnt that Vet Fee Help only covers the diploma component of the training which is the Multi-Engine Command Instrument Rating & only equates to about one quarter of the total course fees. Under the current rules Flying Schools are NOT permitted to "roll" the Commercial Pilot's Licence (Certificate 4) & the Multi-Engine Command Instrument Rating (Diploma) into one training package which is known as "nesting" and is illegal at a state RTO level! Note that the individual state governments currently manage the accreditation of flying schools as RTO's and all operate under very different rules to each other.

At about the same time as flying schools were being offered the opportunity to become Vet Fee Help providers many of Australia's Universities elected to enter into the pilot training industry. Historically universities have run aviation degree courses, covered by HEX fees, but for the past two years have offered Fee Help for students to pay for the practical pilot training component of their University degree. Universities are Higher Education Providers (HEP) are self regulating & operate under very different rules to the flying school Vet sector.

Unlike Flying Schools in the VET sector Universities offer FEE Help for the total Commercial Pilot Licence & Multi-Engine Command Instrument Rating & it appears they are NOT subject to the same "nesting" rules as the flying schools unless they are nesting the courses illegally.

This requires further investigation by the Government to determine how in fact Universities have got around the "nesting" rules when the flying schools can't.

Flying schools are currently at a major financial competitive disadvantage due to the unlevel playing field brought about by the disparity in the rules governing Flying Schools & Universities over the nesting of courses.

I estimate that Universities trained around 650 pilots last year who were attracted by the offer of Fee Help paying for the pilot training component of the course. Historically these pilots have been

the domain of the Flying Schools. Flying schools trained very few Australian pilots last year putting them under extreme financial pressure!

In the past 18 months four of Australia's major flying schools have gone out of business with many more poised to follow suit in the not too distant future.

Australia cannot afford to lose its Flying Schools & requires immediate government intervention to ensure this DOES NOT happen!

The future safety of the airline industry is at stake! Universities do not have the experience or skill sets to ensure that trainee pilots are trained to the high standards required to ensure Australia's airlines continue to maintain the highest safety standards we all enjoy!

It is interesting to note that if you log onto the websites of Jetstar, Virgin Blue & Tiger Airways & navigate to their employment requirements for pilots you will note that not one of them requires a University Degree to gain employment with their airlines.

Why? Because the airlines know that it is only practical flight experience that equates to safety in the cockpit!! University degrees add NO value to pilot safety in the cockpit!

The only prerequisite any of our airlines have for pilots to gain employment is flying hours logged in their log books. The only way a pilot can gain those flying hours is to get a commercial pilot's licence as quickly as possible, gain employment as a pilot & begin to log those hours.

University degrees generally take 3 to 5 years to complete before a trainee can gain employment whereas a pilot that trains in a flying school usually completes his or her training within 12 months or less.

Even though some of the Universities outsource their flying training to Flying Schools one of the major problems with University pilot training is that under the antidiscrimination rules under which Universities operate they are NOT allowed to turn away any student that choose to enrol on their pilot courses!

This means that individuals who generally have never had any interest in aviation or becoming pilots are enrolling on the University courses just because Fee Help is available and are not necessarily the type of candidates we want crewing our future airline jets.

The same anti-discrimination rules apply in the Vet Fee Help sector which means to gain student funding Flying Schools are now forced to lower their standards & accept pilot candidates that they would normally reject. Ultimately this could severely impact safety at the Airline level in the future.

It is well documented in both the military & civil pilot training sectors that individuals who are academically brilliant generally do NOT have very good hand, eye, foot co-ordination skills and are generally below average "stick & rudder" pilots. In other words the ones who fly the best generally struggle with passing the theory exams required by CASA to hold a commercial pilot's licence.

Universities are geared towards academia so once again may NOT be targeting suitable pilot candidates with suitable hand, eye foot co-ordination skills or the required deep rooted desire to learn to fly & become an airline pilot.

In an attempt to protect the funds of Australian Domestic & International trainee Pilots Flying Schools are currently required to become members of ACPET. ACPET is a tuition assurance scheme under which flying schools are required to give assurances that if any flying school in their "Region" goes out of business they are required to take on students who have lost their fees & train the student to completion at the schools expense! In some instances this has mounted to a potential multi-million dollar burden to the ACPET flying school members which they cannot afford without facing liquidation themselves!

With the demise of the four major flying schools recently the remaining schools have refused to accept the liability of the students & this has caused the Government to pay out millions of dollars from the Government ESOS fund to refund student fees.

I have lobbied several government departments & ACPET to set up a trust fund where the fees for both Domestic & International students are managed & only paid out to the flying schools upon receipt of an invoice for flying hours as they are completed.

Under this proposed scenario student fees are completely protected.

I am constantly informed that the cost to manage such a fund is prohibitive but I disagree because the fees that the Government has been forced to pay back to students via the ESOS Fund would more than cover these costs.

The costs of the DEEWR staff engaged to review all the Flying Schools Vet Fee Applications & multiple resubmissions they have required over the past two years would more than offset these costs as well.

It is currently legislated that flying schools must be a member of ACPET, at great expense to the flying schools & the system is clearly NOT working!

To qualify as a pilot students are required to gain two pilot's licences being:

1. Commercial Pilots Licence (150 hours flight training)
2. Multi-Engine Command Instrument Rating (22 hours flight training/20 hours simulator)

At some flying schools students can gain a commercial pilot's licence in as little as 16 to 18 weeks. Other flying schools complete the course in 12 months to 2 years whilst University pilot courses take up to 4 or 5 years before trainees qualify.

Regardless of how long a flying school or University takes to complete a commercial pilot's licence CASA still only require 150 flying hours to complete the Commercial Pilot training so if it can be completed in 16 weeks stretching the training out over 4 years makes the pilot less safe because they are unable to consolidate their training.

A pilot who completes their training in 16 weeks flies one to two sorties every day whilst on their course & should not forget how to fly because the training is always fresh in their memory.

A pilot who completes a four year aviation degree course at University flies an average of one 2.5 hour sortie every 25 days

When a teenager is learning to drive a motor vehicle & their parent's book the final 10 lessons with a driving instructor prior to their final driving test the parents usually book each lesson 1 day apart for 10 days so the student consolidates the training giving them a higher chance of passing the test. They don't space the 10 driving lessons over 1 year because parents recognise that this will result in a much lower standard & dramatically increase the chance of failing the test.

It is the same in aviation! In fact the airlines call it currency -how often pilots fly their aircraft. The airlines know that every day a pilot is not flying his or her aircraft it dramatically increases the chances of an accident because the pilots become "rusty" so airlines are meticulous in keeping their pilots flying as regularly as possible for the sake of safety!

The importance of a Pilot's currency whether at the pilot entry training level or at the airline level should be the same for the sake of safety!

Every day a student is NOT flying has a significant impact on aircraft safety!

We accept this as the norm at the airline level however at the entry pilot training level we have historically accepted a much lesser standard of currency. This needs to be reviewed because projected forward this lack of currency in training can lead to a serious breach of safety as a pilot progresses through his/her career.

In all industries it is accepted that apprenticeships are the best way to train young people joining a particular field. An older more experienced worker imparts his or her knowledge gained from many years experience to the younger novice apprentice.

It should be the same for pilots. A pilot with a raw commercial pilot's licence issued by CASA has a licence to begin to learn. The best way for this to happen is for the pilot to join a Regional Airline or major airline as a co-pilot to be trained by a Captain who has many years of experience in that industry. This is the safest way to train new pilots into the industry.

In August 2010 the US Congress passed a new law stating that all new pilots needed to gain 1500 hours flight experience prior to joining a Regional or Major Airline in the USA.

I believe Congresses decision was irrational because those in the industry know that forcing newly trained pilots to gain 1500 flying hours experience in the general aviation industry is irrelevant to the type of flying they will do when they join an airline.

The major difference is that in general aviation charter pilots often fly as a single pilot by themselves making decisions on their own. Once they join an airline they are required to fly as a co-pilot with another captain & often find the transition very difficult to the multi-crew role & find it difficult to submit to the Captain's authority because they are accustomed to making their own decisions which

can lead to disagreements in the cockpit & ultimately an unsafe working environment. Airlines often have to “detrain” general aviation pilots from their bad habits.

Historically they have found that it is better to take raw recruits with little or no practical experience & to train them into the multi-crew environment, as apprentices, from day one. Airlines in Europe, Asia & the USA have successfully achieved this over the past 30 years.

Airlines all over the world occasionally have a small number of pilots in their ranks who fail to maintain the high standards required to be an airline pilot. These pilots will quite often be involved in ongoing incidents, resulting in a breach of aircraft safety, on a regular basis.

These pilots are generally able to meet the prescribed minimum standards when checked on their bi-annual check flights but will continue to be involved in incidences throughout the rest of the year.

Many airlines would love to terminate these pilots from their employ for safety reasons however draconian industrial relations laws make it almost impossible for any company to terminate pilots that are involved in continuous breaches of safety.

Pilots are still human & occasionally make mistakes whilst flying however Airlines need to have the freedom to be able to terminate the employment contracts of pilots who jeopardise the safety of any flight on an ongoing basis.

In my opinion Congress should have dealt with the issues at hand in the same manner by giving more freedom to the Airline Check & Training departments in the US to deal with underperforming pilots in such a way.

Forcing pilots to fly in General Aviation for 1500 hours will NOT make any difference to the standard of future airline pilots in Australia! It may in fact lead to a greater breach of airline safety in Australia.

Legacy Airlines need to shift much of their operation over to lower cost subsidiarys, if they are to remain competitive in the global LCC market.

The Qantas pilots union is obviously concerned with the potential loss of jobs to its members at Qantas mainline as the jobs disappear across to Jetstar & would naturally like to see Jetstar stopped from employing & training pilots with minimum flying experience into the right hand seat of its Jets.

For the reasons given above I support this training path that Jetstar & other airlines are adopting.

However it is important that Airlines in Australia continue to employ at least 50% of their pilots from the pool of individuals who train at general flying schools and work their way up through the charter companies in remote areas around Australia & then go on to work for Australia’s regional airlines.

Failure to enforce this could lead to the collapse of Australia’s general aviation industry as most young trainee pilots aspire to become airline pilots & will NOT invest the time or money required to be relegated to flying small aircraft based in some remote outback town for the rest of their lives!

The failure of up & coming pilots to have the desire to take these outback jobs could lead to the collapse of the outback general aviation sector which outback Australia relies on so heavily.

I think it is worth noting at this point that Airline Managers in Australia & other places in the world often cite the cost of pilots as exorbitant & a financial drain on their airlines.

The cost of the captain's wage of \$190,000.00 annually amortised over 180 passengers per 1 hour flight sectors on a Boeing 737 or Airbus A320 aircraft is only \$1.17 per passenger per flight hour. The cost to give a Captain a \$100,000.00 pay rise is only 0.62 cents per passenger per flight hour.

The cost to ensure that Australia continues to maintain the best trained pilots in the world is very small & the cost to the airlines to pay the required salaries to ensure we continue to attract the best is also insignificant as I have pointed out.

There is a move by some airlines in Australia to base pilots off shore to allegedly decrease the uncompetitive cost of crew to make the airline more competitive. From the costs shown above this is a nonsense & it is important that the Australian government protect the jobs of Australian pilots, in Australia, to maintain our world's best practice high standards of pilots.

Recently my wife & I booked a flight to Singapore over the Christmas break. I deliberately chose to book with an Australian based LCC because I recognise the higher standards of the Australian trained pilots & found all the seats were completely booked out for one reason – that passengers in both Australia & Asia recognise the importance of having highly trained pilots on our flights.

It is important to note that we could have purchased seats at much lower costs on a range of other low cost carriers in the region.

This flies in the face of any Airlines argument that pilot jobs need to be driven offshore to save costs. Passengers are very astute & take into account a range of factors such as pilot training standards & safety when purchasing their tickets.

Whilst Pilots are employed within Australia we can ensure that we continue to maintain the highest standards in Pilot Training that we have grown to enjoy through regulation & correct monitoring via CASA. Once jobs are shifted offshore we lose the ability to monitor & enforce correct pilot training standards are being implemented.

Boeing recently estimated that the global pilot shortage will be a minimum of 23,000 pilots per year.

The world's training industry collectively can only train around 13,000 new pilots annually leaving a large annual deficit of available pilots.

If the Australian government follows the recent legislation adopted by Congress it could bring the Australian airline industry to its knees due to a lack of available pilots & severely impede future expansion of the Australian Airline industry.

If this happens the major airlines may choose to shift all their pilots from regional routes to the mainline trunk route flights potentially causing the complete collapse of air services to country towns around Australia.

## In Summary

1. To ensure the future safety of aviation in Australia I call on the majority of Politicians from all persuasions to bring about immediate change to save the flight training industry in Australia by levelling the playing field between Universities & Flying Schools for pilot funding by removing Fee Help from the Universities or making it available immediately to Flying Schools.
2. Place Flying Schools back under the authority of the Civil Aviation Safety Authority as the governing body of Pilot Training.
3. Remove the need for flying schools to become RTO's as it is irrelevant to the airlines whether a pilot holds a diploma or a University Degree.
4. Remove Flying Schools from the student anti-discrimination rules enshrining the RTO sector to ensure that only the highest quality candidates with a life-long passion to be a pilot undertake pilot training.
5. Remove the legislative requirement for Flying Schools to be members of ACPETs Tuition Assurance Scheme.
6. Set up a Government managed Trust fund where all domestic & international pilot training fees are managed & protected & only paid out to flying schools upon receiving an invoice only once the training flights have taken place.
7. I call on Politicians NOT to follow US Congress & pass laws that force pilots to gain 1500 flying hours experience prior to being employed by a Regional or Major Airline as this could severely impede the growth of the Australian airline industry in the near future & may bring regional air services to their knees.
8. Amend Australia's industrial relations laws to make it easier for Airlines to immediately dismiss pilots who continue to be involved in ongoing incidents.
9. Legislate via CASA regulations that Pilots who choose to commute to work at another base must have a minimum 24 hour rest period prior to operating any flights.
10. Protect the future jobs of highly trained Australian pilots by not allowing airlines to shift pilot recruitment & bases offshore.
11. So that we can continue to monitor & maintain the highest level of pilot training & recurrent checking of airline pilots by NOT allowing our pilot jobs to be shifted offshore.
12. Recognise that the cost of employing the world's best pilots & paying them what is required to ensure that we attract the highest calibre is NOT expensive on a per passenger per flight hour basis.