

## Terms of Reference

(a) pilot experience requirements and the consequence of any reduction in flight hour requirements on safety;(b) the United States of America's Federal Aviation Administration Extension Act of 2010 which requires a minimum of 1 500 flight hours before a pilot is able to operate on regular public transport services and whether a similar mandatory requirement should be applied in Australia;(c) current industry practices to recruit pilots, including pay-for-training schemes and the impact such schemes may have on safety;(d) retention of experienced pilots;(e) type rating and recurrent training for pilots;(f) the capacity of the Civil Aviation Safety Authority to appropriately oversee and update safety regulations given the ongoing and rapid development of new technologies and skills shortages in the aviation sector;(g) the need to provide legislative immunity to pilots and other flight crew who report on safety matters and whether the United States and European approaches would be appropriate in the Australian aviation environment;(h) reporting of incidents to aviation authorities by pilots, crew and operators and the handling of those reports by the authorities, including the following incidents:(i) the Jetstar incident at Melbourne airport on 21 June 2007, and(ii) the Tiger Airways incident, en route from Mackay to Melbourne, on 18 May 2009;(i) how reporting processes can be strengthened to improve safety and related training, including consideration of the Transport Safety Investigation Amendment (Incident Reports) Bill 2010; and(j) any other related matters.

My name is Geoff Klouth and I am an A320 Training Captain with Jetstar Airways. I learnt to fly in 1983 and funded my own training through to the Commercial Pilot License. I commenced my commercial aviation career in 1987 when I obtained a position as a flying instructor in Canberra. My career progression to an airline followed the traditional pathway of general aviation, regional airlines and domestic airlines. My first "jet job" was as a Boeing 737 First Officer with Ansett Airlines in 1993. The training I received was conducted by an Ansett Check Captain using Ansett simulators and facilities. I was also an employee during my training so I had security of tenure. When Ansett ceased operating in March 2002 I was unemployed as a pilot for the first time in my career. I returned to general aviation until eventually obtaining a position as a Second Officer with Qantas Airways in September 2002. The training I received at Qantas was comprehensive and I would equate it with the training I received at Ansett. Due to a variety of reasons I resigned from Qantas in 2005 and took a position as a Senior Transport Safety Investigator (Aviation) with the Australian Transport Safety Bureau in Canberra. I was able to use my experience in aviation to develop a unique set of skills as an accident investigator. During this time I investigated several incidents involving domestic jet operations that indicated to me that the standard of operation was not as high as when I was flying.

In 2006 I decided to re-enter the aviation industry and took a position with Jetstar Airways as an A320 First Officer. This was the first time that I was required to pay for my endorsement on a jet aircraft and I was not employed by the airline until I had completed my training and passed a simulator check with Jetstar.

While I was a First Officer I worked as a Fleet Investigator with the Jetstar Safety Department until I achieved the position of A320 Captain.

I have provided this background to demonstrate that I have experience in aviation from

both the operational and the safety investigation fields as well as having had the experience of in-house training and third party training.  
I now offer my comments on the terms of reference.

(a) pilot experience requirements and the consequence of any reduction in flight hour requirements on safety;

Traditionally experience has been valued in aviation and it was only through the accrual of experience that a pilot was able to progress to the next level of operation. This would result in experience levels in the cockpits of jet aircraft being high with the First Officer and the Captain. The stable nature of the Australian airline industry also meant that First Officers generally had many years in the right hand seat before progressing to Captain. With the collapse of Ansett and the rapid expansion of Virgin Blue that stable progression was replaced by pilots obtaining jet Command positions within 6 to 12 months of commencing with the airline.

An investigation that I was a part of with the ATSB involved a Boeing 737 that suffered a partial decompression. The Captain disengaged the autopilot before putting his oxygen mask on and then proceeded to hand fly the subsequent descent until encouraged by his First Officer to allow the autopilot to control the aircraft. The Captains total flying hours were 6500 of which approximately half were 737 hours.

Reducing the hour requirements for pilots puts the other pilot under more pressure to make up for the lack of experience. If the Captain does not have much experience then they may find themselves in a situation that neither pilot knows how to deal with effectively.

(b) the United States of America's Federal Aviation Administration Extension Act of 2010 which requires a minimum of 1 500 flight hours before a pilot is able to operate on regular public transport services and whether a similar mandatory requirement should be applied in Australia;

A person with 1500 flight hours will be more capable than a person with 200 flight hours. They will have been exposed to a full change of season and know how to cope with weather changes and generally have more knowledge about the environment they work in. To obtain an ATPL a person requires 1500 flight hours so that should be the minimum standard before they are permitted to operate on RPT services. The pressure to reduce the flying hours required has more to do with expediency than an improved method of training pilots.

(c) current industry practices to recruit pilots, including pay-for-training schemes and the impact such schemes may have on safety;

The pay for training schemes that are currently used by the Low Cost Carriers result in new pilots commencing their career in airlines with a substantial amount of debt.

Combined with debt that they may have incurred during their commercial training debts of over \$100,000 are not uncommon. This puts an additional layer of stress on the new First Officer that may result in them not wanting to "rock the boat" when it comes to criticism of their training.

Having experienced in-house training and pay for training, the in-house training prepares one better for line training and gives a better foundation of knowledge of the aircraft.

I did my A320 rating with Alteon which is a Boeing owned company. I was not provided with cockpit diagrams on which to practise procedures (colloquially referred to as paper

tigers), provided with any systems manuals (other than those that were purchased from Jetstar), with which to revise the computer based training and had simulator instructors who had never actually flown the aircraft. The instructors were not familiar with the airline operating procedures and would actually speak disparagingly about the airline that I was to be employed by.

It was only because I had already been trained on jet aircraft that I was able understand what would be required of me when I was checked by the airline. The training provides little more than an endorsement approved by CASA. It does not provide value for money and does not prepare a new pilot adequately for line training.

An exception to the poor quality of the training provided by a third party is that provided by Air New Zealand. It was acknowledged by Flight Operations management in Jetstar that the students who had completed their endorsement training with ANZ demonstrated a higher standard of proficiency during their transition simulator checks. They were trained to Jetstar procedures and had been trained by ANZ pilots who were current on the A320. The reason all pilots who were to be employed by Jetstar were not sent to the ANZ facility was due to a contractual agreement between Jetstar and Alteon.

(d) retention of experienced pilots;

In any other professional field a person with experience is usually remunerated for the experience and knowledge that they bring to an organisation. Pilots cannot usually set up a business as a pilot for hire and they are usually employed by the company they fly for. Working as a contract pilot does not provide employment stability. Most pilots prefer to establish a career with the one airline with Qantas being the best example of that in Australia.

Unfortunately long term employees are viewed as a financial liability and CFO's would prefer that employees move on before they accrue long service leave and sick leave. The experience that a pilot develops over time is not considered to have a value to the company.

(e) type rating and recurrent training for pilots;

The current program of recurrent training that I receive in Jetstar is of a similar standard to the training I received in Ansett and Qantas. The type rating training is discussed in my response to part (c) of the terms of reference.

(f) the capacity of the Civil Aviation Safety Authority to appropriately oversee and update safety regulations given the ongoing and rapid development of new technologies and skills shortages in the aviation sector;

The Civil Aviation Safety Authority has been attempting to develop new regulations for the aviation industry for the past twenty years without success. It would require more staff to oversee the change in new technologies and skills shortages. It would also require a more rigorous assessment of airlines changing operational procedures and staffing levels to reduce the number of crew operating on a particular aircraft type.

As an example Jetstar was able to convince CASA that the A321, which is capable of carrying 210 passengers, could be evacuated in an emergency with only 5 cabin crew.

This relies on the cabin crew briefing passengers sitting in the exit rows on how to respond in an emergency if the cabin crew required assistance. As cabin crew are required to participate in a multi week training program the assumption that passengers would be capable of assisting in an emergency is flawed. A 747 carries twice the number of passengers of an A321 but has three times as many cabin crew. This change was

allowed by CASA.

(g) the need to provide legislative immunity to pilots and other flight crew who report on safety matters and whether the United States and European approaches would be appropriate in the Australian aviation environment;

The ATSB confidential reporting system (REPCON) already provides for identity protected reporting of safety matters.

h) reporting of incidents to aviation authorities by pilots, crew and operators and the handling of those reports by the authorities, including the following incidents:(i) the Jetstar incident at Melbourne airport on 21 June 2007, and(ii) the Tiger Airways incident, en route from Mackay to Melbourne, on 18 May 2009;

Whilst I am not familiar with the Tiger Airways incident I was working in the Jetstar Safety department when the Jetstar incident occurred although I was on leave during August 2007. The incident was reported by the pilots to Jetstar Safety and it was subsequently reported to the ATSB. The data recorded by the aircraft during the incident was stored on a Quick Access Recorder which had to be removed from the aircraft and the data sent to Qantas. Qantas processed all Jetstar QAR information as Jetstar do not have the resources to conduct this process.

Qantas informed Jetstar in August that the QAR data indicated that a Ground Proximity Warning had occurred. Jetstar Flight Operations Management then requested further information and commenced an internal investigation although at this stage the investigation focused on incorrect use of the TOGA function and the June 2007 incident was one of three incidents. The other two incidents involved a missed handled go-around in Avalon and a long landing in Adelaide.

I do not believe that there was a deliberate attempt by Jetstar to conceal information from the ATSB but that there were no protocols that required the ATSB to be informed of subsequent information.

When I returned from leave in September I was tasked with preparing a report that only focused on the June 2007 incident. The Fleet Investigator who had been preparing the report on the three incidents briefed me on what had been done and then he went on four weeks leave.

It was during this time that the incident was reported in the media and the ATSB decided to investigate the incident. It was then accorded significant priority in Jetstar. While I was trying to put together an investigation using my ATSB experience I was diverted from the task when I was advised that the Captain involved in the incident had been contacted by persons claiming to be from the ATSB and were seeking further information regarding the event. This resulted in me having to contact Qantas Security and the ATSB to try and discover who was responsible for the call. The ATSB referred the matter to the AFP but they decided that it was not worth the resources required to pursue the matter.

My position as a Fleet Investigator was a part-time position and I was also required to fulfil my duties as a First Officer. Significantly I was still subject to the Duty Time limitations that governed how many hours in a 14 day period that a pilot could work. At the end of October I reached 100 hours duty in 14 days so I was taken off one day of flying duty.

I submitted a draft report of the June 2007 incident in November. I stopped performing the duties as a Fleet Investigator in January as I was preparing for a promotion to Captain. The main limitation in my attempt to conduct the investigation was the lack of resources

in the Safety Department. The investigation should have been conducted by an investigator who was able to devote themselves full-time to the task. Part-time investigators should be limited to minor investigations. As a part-time investigator I was not provided with a computer and had to provide my own and I was not even allocated a desk and had to take whatever desk was available when I was in the office. An airline safety department should be audited possibly by CASA to ensure that sufficient resources are provided based on the size of the airline. My understanding is that the Jetstar Safety Department is still the same size as it was in June 2007 and the Fleet Investigators are still rostered on a part-time basis.

(i) how reporting processes can be strengthened to improve safety and related training, including consideration of the Transport Safety Investigation Amendment (Incident Reports) Bill 2010; and

Leading on from section i) I believe that all airline safety departments should be required to forward a copy of any internal investigation, including draft reports, to the ATSB as a legislative requirement. This would allow the ATSB to keep track of all safety incidents occurring as well as gaining an understanding of the quality of the investigations conducted by airlines.

Not all incidents that have been investigated by Jetstar have been reported to the ATSB. These incidents were not considered to be covered by the definitions of Immediately Reportable Matters and Routinely Reportable Matters under the Transport Safety Investigation Act.

An incident at Williamtown Airport in 2006 (possibly 2007) resulted in a Low speed warning from the aircraft. The crew had programmed the aircraft computer to fly a circuit which led to the warning. Technically the incident did not meet the criteria for IRM or RRM and so was not reported to the ATSB. The Safety Department did prepare an internal report and any pilot who wanted to view the final report was required to sign out a copy and sign again when it was returned.

By requiring that all reports are forwarded to the ATSB all safety incidents, regardless of the definition of IRM and RRM, would be captured.

(j) any other related matters.

Jetstar has been able to reduce the amount of time spent on training new Flight Attendants, both in ground and aircraft training. The result has been that some new Flight Attendants have completed their training without having operated on the airline's A321 aircraft. They have been unable to "arm" the doors. Arming the doors is necessary to allow for the automatic deployment of the emergency escape slide if the aircraft has to be evacuated. Some Captains have stood Flight Attendants down and not allowed them to operate on an aircraft because they have not been able to demonstrate that they have the required knowledge to perform their safety function. This is not the fault of the F/A but rather a symptom of the reduction in resources and training that Jetstar allocated to F/A training.

Jetstar is also employing more F/A's who are based in Singapore and Bangkok yet operate domestically in Australia on international "tag" flights. These flights are considered to be extensions of international flights that arrive in Darwin but then continue to other Australian airports. The flights are available for domestic passengers to fly on but the cabin crew are often all foreign based F/A's. The foreign based crew all speak English but the ability to be understood in an emergency is an aspect of their training that

is not effectively assessed. They are also paid significantly less than Australian based crew so Jetstar prefer to recruit and use foreign based crew domestically.

In conclusion I consider that the operational staff of Australian domestic airlines still operate to the highest standards but there is constant pressure to reduce staffing costs by reducing training. In the case of pilots the cost of the training is borne by the individual and the training provided by a third party operator with varying results. In the case of flight attendants the training has been reduced to a point where some are not capable of performing their safety function.

The CEO of Jetstar requires a ten percent reduction in the airline costs per year. In a safety sensitive industry this will result in a reduction of the safety margins that have contributed to Australia's aviation safety record. Self regulation only allows the airlines to continue their cost cutting ideology without proper scrutiny. The only way airlines will allocate sufficient resources to train, operate and investigate their operations is through the scrutiny and legislation of the Australian Parliament.