

Submission to the Senate Enquiry into Pilot Training and Experience Standards
25 Oct 2010

Dear Sir/Madam

I request that my identity be kept confidential however; I would be pleased to see my comments in the public arena.

Thank you for receiving submissions on this very important topic. I believe it is not an overstatement to say that the only thing standing in the way of a significant and permanent drop in aviation standards in Australia is this Senate enquiry. The boards of airlines are stating that overseas competition is forcing them to cut costs and lower standards. They justify their lowering of pilot standards (and other aviation standards) by saying 'they are doing it in Europe (or Asia), we need to do it as well'. The pattern that is developing is that the board will use commercial pressures to justify a race to the bottom in terms of aviation standards. The only thing stopping Australia's aviation standards from dropping to the equal-lowest in the world is this Senate enquiry.

I believe that commercial and demographic pressures on the airline industry are causing the boards of airline companies to look for new ways to reduce their costs and find qualified pilots to fly their aircraft. One way they have chosen to do this is to hire pilots (cadets) with only a few hundred hours experience. These cadets are very good candidates and deserve their opportunity however, they are only put through a very quick conversion course in a simulator, followed by line training with paying passengers on board. The airlines have called and do still call this a training program when, in fact, it is merely a conversion course, little changed from the conversion course given to far more experienced pilots that were recruited in the past. This conversion course has always had very little training component and the commercial reality is that it is run for just long enough to get the pilots to be able to demonstrate some core competencies to a minimum standard. Once these minimum standards are demonstrated, the pilots are allowed to fly fare paying passengers on RPT routes. This was not such a problem when the airlines were recruiting experienced pilots however, the pilots they are now recruiting are much less experienced but the course has remained almost unchanged.

This minimal training is having flow on effects in the flight operation. Additional pressure is being placed on the Pilot-In-Command to teach these pilots how to fly whilst also managing an RPT operation. Airline management have little further input into the skill development of the junior pilots and there is limited opportunities for any of the airline pilots, experienced or not, to develop their skills above the minimum standard. This is because the airlines are unwilling to fund the additional training component necessary to lift pilot skills from the demonstration of a minimum competency to a level of excellence. Therefore, the general level of pilot skill, especially in items that cannot be practiced on-line, as part of an RPT operation, languishes around the minimum level of competence that the airline is forced by legislation to meet. This situation will remain because of commercial pressures; unless legislation is enacted to enable pilots to undertake no-jeopardy training to a level above the minimum standard and in areas of competence not strictly part of the 'core competency' suite of skills.

Another factor that is often overlooked is that legislation identifies the pilot as the person ultimately responsible for the operation of the aircraft. This principle is well entrenched in many Australian CAO's, CAR's and other aviation regulations and legislation. It is not the board, or the air traffic controllers, or the cabin crew or engineers who, by

legislation, are held ultimately responsible for the aircraft, it is the pilots. However, the boards are hiring and training less experienced pilots as time goes on. The pilots are responsible for the conduct of the aircraft but the boards now decide how much training and experience they get. So, although the responsibility carried by pilots remains the same under legislation, the training these pilots receive is not significantly increasing as their experience levels are reducing. I believe additional legislation is required to protect pilots and ensure that all pilots receive the training they need in order to continue to fulfill their legal obligations to a high standard of excellence (not just, and far beyond, a minimum standard of competence). The level of training given in the past was a judgment call by the board based on factors and assumptions that are rapidly becoming obsolete. The board's will be unwilling to fund this additional no-jeopardy training for their increasingly inexperienced flight crews, but they will (as will legislation) still hold their pilots primarily responsible if an accident were to happen.

SOLUTIONS

LEGISLATION. There is some very good and practical legislation already in place in Australia around fatigue management, duty and flight hours. This simple, elegant and excellent legislation hardly causes a ripple of concern in the industry as it works so well for everyone. It is simple, prescriptive, and effective, and has saved the industry in Australia from the sort of fatigue issues that are evident in the US and were sighted as an issue in the Colgan incident. I believe that this can be a pattern for developing legislation around pilot training.

The training legislation will need to encompass certain principles. These are No Jeopardy Training in Simulators. Pilots do not have an opportunity to practice rarely used skills in the real aeroplane. Boards are keen to check that their pilots can demonstrate a minimum level of competence but then want them to stop training and go out and fly. The only way pilot skills will attain and then retain an excellent standard is for specific legislation that allows pilots to practice core and non-core skills in a 'no-jeopardy' environment on a regular basis and to a high level. I believe that 12 hours per year of no-jeopardy training in a suitable simulator would be sufficient for this skill development and retention. Any checking required would need to be added to this 12 hour figure. This is to avoid the 12 hours no-jeopardy becoming 10 hours no-jeopardy and 2 hours checking (or worse). This 12 hour figure is necessarily an arbitrary figure but a very realistic and practical one. This would be on top of the cyclic checking program that the airlines conduct. However, there must be a figure so that pilots have the opportunity to train to a standard sufficient to ensure that they can meet their legal obligations.

Simulators would not need to be full motion. Much useful training in procedures, management and systems knowledge can be attained in inexpensive 'low end' simulators or procedural trainers. Much of this no-jeopardy training could be conducted in this cheaper type of simulator. It would be necessary for the simulator to have good visuals, as most information is received by the eye. The simulator would also need to accurately mimic the normal and non-normal operation of the aircraft systems, so that pilots can practice normal and non-normal procedures in an accurate environment. The only activities that would need full motion high fidelity feel would be V1 cuts, upset recoveries, stick shakers and other handling type scenarios. These could also be practiced in the procedural trainer but would lack an element of fidelity. The cost of these

procedural trainers is minimal and purchasing quantities of them will not cost the board much and will significantly increase the training capacity of the airline. Such an expense will be insignificant in terms of the airlines international competitiveness but would significantly increase the training given to pilots.

Training before Checking. Pilots are now regularly checked on items that they have no opportunity to practice beforehand. This saves the company money and is now common practice within the industry but it puts the pilots behind the ball in terms of skill development. The only way to ensure that pilots are allowed to train before a check is to have this principle enshrined in legislation.

SIMULATORS. As experience drops, training should increase. This training has historically taken place in one company simulator that all pilots fly to on a regular basis. This exercise is expensive and time consuming. This is how airlines have checked and trained their pilots for the last 50 years. The sole simulator is a bottleneck that limits training capacity and makes accessing it expensive. The solution is to purchase multiple high-fidelity procedural trainers and place them at strategic locations throughout the network. These trainers are quite inexpensive and have many benefits to pilots who wish to practice procedures, emergencies and such. Much valuable and necessary training can be accomplished at very little cost to the airline if a simulator were positioned each of the pilots home ports. For the cost of electricity, the airline could provide their pilots with a very valuable and ongoing training and they would not need to pay travel and allowances to achieve this.

CONCLUSION. The problem of experience levels dropping can only be addressed with an increase in training. This training is necessary as the legislative responsibility placed on pilots has not reduced, even though the experience levels in the cockpit are reducing. To ensure that pilots remain capable of fulfilling their obligations, they need legislative protection to guarantee that they are receiving training of sufficient quality and quantity. This legislation should be modeled in a similar way to the existing and excellent legislation regarding fatigue, flight and duty hours. This is because this particular pattern of legislation has shown wide practical acceptance throughout the industry. The cost of meeting this increased legislative training requirement will be minimal if airlines take advantage of the advances in low cost simulator technologies that have occurred in the last 50 years. If these procedural trainers are deployed to each pilot base, the high cost of travel, accommodation and allowances that have historically been part of the cost of training will be reduced or eliminated. This proposal will therefore meet the needs of pilots without impacting the international competitiveness of the airline.

Thank you for receiving my submission and thank you for holding such a worthwhile enquiry.

Yours Sincerely

Name Withheld