John Laming,

23 October 2010.

To: Committee Secretary, Senate Standing Committee on Rural Affairs and Transport

Dear Sir,

This is in response to the proposed Inquiry about pilot training and airline safety. In particular I refer to paragraph (a) and (b) on the page Information about the Inquiry. Please note that apart from my personal experiences in Europe with low hour first officers in the period 1990-91, the information I have written in this paper is based on anecdotal evidence and hearsay.

The following extracts from media and ATSB sources are pertinent to this submission:

Emergency landing after pilot dies on flight

19:08 AEST Thu Oct 14 2010 21 minutes ago Oct 14, 2010

The captain of a Qatar Airways flight from the Philippines to Qatar has died as it was in the air, forcing the plane to be diverted to the Malaysian capital Kuala Lumpur, the carrier said.

"Qatar Airways regrets to inform that the captain of Flight QR645, operating from Manila to Doha, passed away on board," the airline said in an emailed statement.

Qatar Airways said the flight was diverted to Kuala Lumpur, where a new crew boarded.

The flight "is due to land at Doha International Airport later today," the statement said, without providing additional details.

The airline declined to elaborate on the cause of death or release the name of the deceased pilot.

Research published by the Australian Transport
Safety Bureau (ATSB) indicated that between 1975
and 2006, there were 98 reported crew
incapacitation occurrences for medical or
physiological reasons. Of these occurrences, 21
were due to gastrointestinal illness. Flight crew
should be aware of any potential medical or
physiological conditions that may affect their fitness
for flight and consider seeking professional medical
advice before commencing duty where such a
condition exists. The following publication (available
at www.atsb.gov.au) provides some useful information on pilot incapacitation occurrences

It is common practice in airlines overseas including Europe, India and Asia to use inexperienced recently graduated pilots as first officers in modern airliners. The first officer in an airliner is the designated second in command. A Second Officer is the designated third in command. Basically the use of inexperienced first officers in airline aircraft is to reduce costs since inexperienced first officers are paid well below the salaries of experienced pilots.

However, this submission is not about pilot wages. It is about the flight safety aspects of using inexperienced pilots as second in command of airline aircraft – whether on large jet transports or on smaller turbo-prop commuter types.

Read this comprehensive opinion recently published on the website <u>www.pprune.org</u> The usefulness of the Pprune website is discussed later in this submission.



Superpilot

Join Date: May 2001

Location: UK Posts: 1,088 The reality is that "P2F" has become the unfriendly term given to a basic disregard of terms and conditions for newly qualified or less experienced pilots and the denial of the same opportunities to a certain community of low time pilot. That is pilots who have completed their professional training, have between 200-300 hours total time and no type rating.

Yes it's a product of Supply vs Demand and lack of proper regulation. It's not only about those airlines which explicitly ask for vast sums of money in order to allow zero commercial time pilots the opportunity to gain experience. P2F has it's component at every level including at that stage which pilots conduct their professional flight training through to the point in time where pilots are deemed "line trained". For example, to fly for BA as a new pilot you will have conducted your training in a manner and at a flight school which charges double the cost of the modular route (thus you will have lined the pockets of the recruitment chief's buddies, failing that then you will have at least satisfied some elitist toffee-nosed agenda!). You are in effect paying a premium in order to get a flying job - Pay to fly? Yet paying for a TR further down the line is abhorred by most (go figure).

Consider these very simple recruitment facts concerning some major airline's method of hiring new pilots (200-300 hours TT, no TR):

BA - Oxford / FTE Integrated Training Graduates ONLY (when they start again)

BA CitiFlyer - Oxford / FTE Integrated Training Graduates ONLY (when they start again)

EasyJet - CTC Cadets, CTC ATP (practically dead), ATP (Mr Curd) 150 hour scheme via BMI 150 hours P2F course.

Ryanair - Via Ryanair conducted TR courses (Modular students accepted)

BMI / bmi Baby - Not recruiting low time pilots (have done in the past)

BMI Regional - Not recruiting low time pilots Monarch - Low time pilots from CTC only (and not for a while)

Jet2.com - Not recruiting low time pilots

Astreaus - Not recruiting low time pilots (have done in

the past from own P2F courses)

Thomson - Not recruiting low time pilots (last did some while ago)

Thomas Cook - Not recruiting low time pilots (have conducted P2F courses in the past and employed a handful, most not)

Titan Airways - Not recruiting low time pilots TNT - Have and do recruit low time pilots but very rarely (competition is high)

Out of the above, the only airline which actively offers the opportunity of a fair assessment to low hour modular students is Ryanair. If successful, you must pay another £30k on top. It can be argued that as the new pilot is not on full pay for a while, this is P2F in action at Ryanair. Ryanair could employ the hundreds of 737 rated pilots out there but they deliberately choose the cadets in order to a.) generate some revenue for the training department and b.) so a lower salary can be offered. Do not get me wrong, I understand the concept of a bond but in the modern case, even though a pilot is paying for a TR, a lowly wage is offered.

From CTC and Oxford cadets EasyJet request payment for a TR. A lovely £34k to be precise, some months ago within that 34k was 100 hours line training. Now your line training is "free" Of Off off you are CTC/Oxford (It's mere definition and playing with different variations of the same corrupt concept). The pilots are then earning next to nothing for the first 6 months. It's not a bonded salary, it's P2F in disguise. EasyJet do and will recruit low time pilots who conducted their training outside of CTC (via the Flexi Crew scheme) but only if they have a min of 150 hours on type and even then via the CTC machine. That forces many to consider P2F with other carriers / companies.

The whole system of recruitment for new pilots is just a money making game for greedy bastards everywhere. Merit and an individual's capabilities mean nothing if you haven't passed through the right doors and paid your dues to the right people. I maybe isolated with regards my thinking but this, is collectively speaking, what I call "Pay To Fly". There is no other job (that I know of and that is so publicly respected) where you are blindly turned down for a fair job interview/assessment on the

basis of where you trained and whose pockets you have lined in the process and that's shockingly abhorrent for a Western society.

My submission is continued below:

Since the end of World War 2 the traditional path for new pilots in Australia wishing to become airline pilots was to first find a job on passenger or cargo carrying charter small aircraft. New Guinea (PNG) was a favourite destination where operators were happy to employ low hour pilots. In turn, these pilots gained experience in small single engine Cessna aircraft and eventually would move up the food chain to flying 6-10 passenger twin engine types. However, insurance restrictions gradually increased in response to aircraft accidents and PNG operators now require experienced general aviation pilots (1000 to 3000 hours) where previously 250 hours would get you a job on Cessna single.

Pilots choosing to seek work in Australia could try to obtain employment on similar light aircraft types to that in PNG but often in remote areas of WA and NT. These aircraft were designed to be flown by one pilot and pilots soon gained on the job experience day and night in the different weather patterns that affect Australian during the four seasons.

By the time the pilot had 2000 hours in his log book he was considered experienced; especially as the majority of his flying was just himself and passengers. Other newly graduated pilots who chose not to seek jobs outside the cities might pay money to undertake a flying instructor course and earn wages by teaching students at flying schools. Typically, a commercial pilot would attain his pilot's licence at 200 hours although now it could be as low as 150 flying hours. It meant that a new flying instructor was now teaching students to fly even though his own experience was minimal. The blind leading the blind as it were. That situation still exists at most flying schools. Newly graduated commercial pilots often take this road of instructing because of the time and money involved in traveling over Australia looking for that first flying job.

In countries where there is little or no general aviation industry, airlines have been forced to lower their recruiting standards to the extent that newly graduated pilots from the airlines own cadet schools go directly into the second in command position in big jets Invariably, these pilots have no background flying experience other than a flying school and flight simulator course.

In China, the authorities take students out of university and stream the students whether they want to or not, as military or airline pilots. The students have no choice. Trainee airline pilots are then sent to flying schools in Australia or America to learn to fly. After a typical one year course, they undergo instruction on an airliner flight simulator and eventually become second in command of an airliner that could carry 300 or more

passengers. This is the equivalent of a teen-age driver having just received his driver's licence, being automatically qualified to teach others how to drive.

Things are slightly different in India although the final result is still the presence of inexperienced first officers (who are legally second in command) in big jets. Wealthy parents are prepared to pay for their sons and daughters to learn to fly in Australia and USA. After completing a one year flying training course, they return to India to take up their appointed place as second in command of big jets. It is not uncommon for Indian first officers to have no wish to be pilots but are forced into this situation because of family pressures of status seeking and financial help to influential friends or relatives.

I recently spoke to a Yugoslav captain flying for the Indian low cost airline Air India Express. One of their aircraft – a Boeing 737 – recently crashed at Mangalore, India after a bad landing in heavy rain killing many of the passengers. The Yugoslav captain expressed deep concern to me at the lack of flying ability of his second in command – an Indian female first officer. She seemed very apprehensive of flying the Boeing 737 and said she had been forced into being a pilot by her relatives who had earlier consulted an astrologer about her future.

In some areas of India, the culture demands that advice from astrologers is mandatory before important decisions are made. According to the young female pilot, the advice was to send her to USA to be taught to fly and then return to be second in command of a Boeing 737 with Air India Express. Her relatives had influential contacts within the airline that ensured she would be employed. That fact she had no interest in flying meant nothing because her salary meant she was her family's cash cow.

Should the captain of her Boeing 737 become incapacitated (refer to the opening paragraphs of this submission) there is no doubt that she would be out of her depth and unable to cope with the emergency. The real danger being she would lose control of the aircraft without another pilot to help her.

In Asia, Middle East and Europe the term P2F means Pay to Fly. In aviation magazines, advertisements are placed by pilot recruiting agencies soliciting inexperienced pilots to pay large sums of money (typically \$15000 -\$20,000) to the recruiting agency in exchange for the pilot being placed with a compliant airline as a temporary first officer. One such recruiting agency is Eagle Jet International in USA www.eaglejet.net That company frequently advertises in Flight International magazine. See the enclosed advertisement.

The Agreement varies between airline and recruiting agencies but usually entails the pilot being promised 300-500 flying hours as a first officer under training while flying normal passenger carrying flights. The airline either does not pay the pilot or at the most a sum far below the salary of a normal first officer. The pilot is usually required to pay for his own simulator training.

After the contracted period, which may for example, be from three to six months, the Agreement between airline and recruiting agency is terminated leaving the pilot jobless. Another P2F new pilot arrives and the employment cycle is repeated. The airline is happy because the pilot effectively pays his own salary. Meanwhile, the airline operates using the normal legal two pilot crew while paying only one pilot. Of course, the recruiting company receives a commission from both the airline and the pilot. The pilot now has more hours in his log book with which to apply for a permanent first officer job elsewhere if he is lucky.

Flight safety is compromised throughout the P2F pilot's short tenure as first officer, since each captain he is crewed with is often over-loaded with the extra responsibility of having to carefully supervise his inexperienced first officer. The statistical chances of the captain suffering serious incapacitation in flight and leaving the first officer to fly single-handed, is extremely small. But to cost conscious airline management, it is well worth the minute risk of an accident because of the inexperience of a P2F second in command.

The fact that this first officer is legally second in command of an airliner with precious little flying experience beyond flying school, is thus conveniently ignored by both airline and the regulator who approves the licencing requirements. Legal maybe – but no way is this safe. Yet this is the norm with many airlines around the world where one priority is to reduce costs by requiring the pilot to pay himself to work.

It sometimes happens where the P2F pilot turns out to be incompetent as second in command, that the airline terminates the Agreement. A clause in the Agreement covers that nicely by stating there is no refund if the pilot fails to come up to the required standard. Of course the airline is also disadvantaged as it has lost the free services of the pilot. Because of this, some airlines may persist with the pilot as second in command and lean on the captains to modify their complaints for the sake of the company finances.

An investigation by the British CAA into a hard landing incident in an A320 Airbus was a case in point. The young pilot attained his basic commercial pilots licence and then paid upwards of \$50,000 to undertake flight simulator training to obtain the A320 Airbus on his licence. It was reported he experienced difficulty with learning to land the simulator. Nevertheless, he eventually was granted a pass and soon after successfully applied to a British airline for position as second in command on the A320. The Agreement was he would be given six months of first officer flying (second in command.) largely at his own expense with the airline paying allowances and overnight accommodation.

During this period he continued having difficulty with landing the A320 and was subject to frequent adverse reports by his various captains. Although it became clear he was out of his depth on the A320 Airbus, this information failed to reach some captains who were unaware of his history of hard landings. It was not until an incident with passengers aboard where he landed with such force that the landing gear system was damaged, did the airline management start looking more closely at the reports of previous captains. Several of these reports recommended the pilot receive remedial training in the simulator before being cleared to act as second in command. Keep in mind, one of the

responsibilities of the first officer is take control of the flight should the captain be unable to carry on due to incapacitation. Quite clearly this particular P2F pilot was a flight safety hazard. All the while, passengers on this airline would rightly assume that both pilots on their journey would be highly experienced with either fully capable of taking control and landing safely should the other be incapacitated. Yet, this situation exists in many overseas airlines where low hour first officers (virtually apprentices) crew long and short range jet airliners with the captain being the only experienced pilot aboard

A recent landing accident at Palermo, Sicily involved an Airbus A319 – a similar type to the A320. From the report below it seems the landing was short of the runway. It is understood from an unconfirmed source that this airline uses P2F first officers. The captain is reported to be an experienced pilot.



Saturday, September 25, 2010

Wind Jet Airbus A319-100, El-EDM, Flight IV-243, Palermo Airport, Italy

Italian to English translation

PALERMO - Technicians ENAC and the Committee of Inquiry set up by the 'management and control of the airport of Palermo this morning the first surveys on Air Wind Jet plane went off the runway last night after it landed in capital. The airport, meanwhile, will remain 'locked up at 21 today.

Incident, in which have been slightly injured a dozen people, has opened an investigation into the prosecutor in Palermo. The investigation and 'coordinated by Carlo Lenzi pm today should provide for the seizure of the aircraft, however, and' fenced off and guarded by the polarity. Even the National Security Agency and flight 'to work rebuilding the causes of the accident, according to Wind Jet, would be determined by the phenomenon of' wind shear ', a sudden change in wind due to bad weather that has put out trim the aircraft by determining bend your cart and off the track. On board the aircraft, from Rome, there were 123 passengers and five crew members.

Before a loud bang, then screams and panic on board, with the plane skidding off the runway at speed in and out. All in a few moments for the 123 passengers Airbus 300 Wind Jet flight from Rome to Palermo seemed interminable. He touched the tragedy last night at the airport Falcone e Borsellino, when an airplane of the greater Italian low cost

airline, on landing, he "skated" ending up on the lawn. About thirty people were slightly injured and have been medicated in the infirmary of the airport. Initiated emergency procedures, but several passengers complained of delays in rescue operations. The 123 on board the aircraft were brought down from the aircraft via the slides and were taken inside the airport. The cause of the accident are still unclear. According to preliminary reports of Wind Jet, everything would have depended on the so-called "wind shear," an atmospheric phenomenon consisting of a sudden change in wind intensity and direction that would put the aircraft out of trim. "The pilot, one of the most experienced of the company - says the press office of low cost - has been good at keeping trim and has fulfilled all emergency operations provided for in these situations."

Reconstruction of Wind Jet will be verified by the National Security Flight, which opened an investigation into the cause of the accident, initially identified by Gesap, the body that manages the airport services, in which heavy rain is coming down for hours about the area . The Prosecutor's Office initiated an investigation on the incident Palermo pm Coordinated by Carlo Lenzi. "We are open racks, and many objects have fallen. I have been wounded on the head - said Salvatore Lauro, engineer, 46 years, including the injured passengers - I saw the right engine covers open. After touching the ground have been violently activated oxygen masks. Then they opened their chutes. And before you leave the airplane some people have blocked the exits for a few minutes because they would not leave hand luggage on board. "

Lauro laments "the delay in receipt of assistance. We had to walk the runway for about fifty meters walk in the rain - he says - before the arrival of the shuttles that have led us to the terminal." "We heard a loud bang as if it came from an explosion. And 'all happened in an instant. Now I have a severe back pain," recalls Cynthia Orabona, 31, Palermo. Whiplash, abrasions, bruises and one passenger with a dislocated shoulder the balance of the accident reconstructed from medical infirmary Francesco Scorza. "The wounded - he said - were nevertheless taken to hospital for checks.

.....

Of course the reason for the accident has yet to be established and it is not yet known whether the captain or first officer was landing the aircraft. In Australia, the policy of using newly graduated pilots as first officers is confined to a few regional airlines. Regional Air Express or REX is one. Until REX began its own flying school at Mangalore and later at Wagga NSW, the airline's policy was to only recruit experienced

pilots from general aviation. Thus the crew always consisted of a captain and first officer both being very experienced. Now in recent times, pilots who learn to fly through the REX school at Wagga, fund their own training knowing that on receiving their commercial pilots licence they will be employed directly as second in command on the SAAB 340 regional airliner — a position of significant authority and responsibility should something un-toward happen to the captain. Cost cutting is again at work since the salaries of new first officers with low flying hours in their log books is considerably less than that offered to experienced pilots joining as first officers.

Indeed, it seemed that REX gave employment preference to cadets from their flying school at Wagga over experienced general aviation charter pilots with several thousand flying hours in their log books. More recently, I understand REX has lost many captains to Jetstar over the past 12 months and have been forced to accept experienced general aviation pilots again, since the cadet first officers do not have the minimum experience level needed to train for captain.

At the moment, Virgin Blue, Jetstar and Cobham airline place importance on extensive previous flying experience as a prerequisite for an interview for a job as first officer. For example, Virgin Blue have always required its candidates to have at least 500 flying hours logged as pilot in command on twin engine aircraft. Generally this would take newly graduated commercial pilots at least 3 years or more to attain. This is because new pilots are usually employed initially on single engine aircraft before going on to twin engine types.

Successful applicants for first officer positions with Virgin Blue, Cobham and Jetstar usually have at least 2500 to 5000 hours in their log books. Each airline has long waiting lists of experienced pilots on their books. This amounts to considerable exposure to decision making time in all weather conditions including exposure to the busy air traffic control environment of our capital city airports. The RFDS demands still higher qualifications of pilots. Despite the high experience level of general aviation pilots applying to join these operators, there is never a shortage of applicants.

For many years, Qantas has operated a cadet pilot scheme where the cost of training is borne by the cadet. There is no guarantee of a first officer job on completion of the flying course but preference is given to a cadet over an experienced pilot where it suits Qantas policy. Successful cadets with perhaps 250 hours of self funded training, are appointed as a second officer (third in command) on Qantas long range flights. They are not permitted to handle the controls below a certain altitude (nominally 15,000 ft) and their primary task is to monitor the automatic pilot. They are not permitted to conduct take off and landings on revenue flights. Their pay is generous by general aviation standards and often more than some Australian captains with foreign airlines. Other cadets may be sent by Qantas to Qantas Link Regional Airlines where they go directly into second in command on turboprop aircraft. Here they are permitted to take off and land and would assume command of the flight should the captain become incapacitated.

After perhaps three or more years as second officers on long range international flights, pilots may be promoted to first officer or second in command. By that time they would have logged over 3000 flying hours on international routes and gained exposure to world wide weather patterns. In contrast, first officers on most Asian airlines are routinely flying as second in command in large jet transports with as little as 300-500 hours experience and certainly poorly placed to take over control of 400 passengers in a Boeing 747 should the captain have a heart attack.

My flying experience covers over sixty years. After 18 years as a RAAF pilot, I variously flew in the Australian Department of Civil Aviation, airline flying on international routes, general aviation and now as a flight simulator instructor. It is from this background I make this submission to the Committee of Inquiry.

Over many years I have read dire warnings of looming pilot shortages in Australia. There have been recent media reports of a future shortage of pilots in Asia but it has never happened in Australia and going from past experience I don't think it ever will. Certainly there have been cyclic shortages of experienced airline pilots in Europe and Asia. This has been one reason for cadet pilot schemes so prevalent in those areas.

Flying schools in USA, Australia and the United Kingdom, graduate hundreds of young inexperienced pilots many of whom go directly into the second in command positions in Asian and Middle Eastern airliners. It is not uncommon for the second in command of a Boeing 777 to have only 500 total flying hours. In Australia, these hours would not get him a job flying a single engine Cessna around Ayes Rock on tourist flights. Captains saddled with these cadets are not happy but have no choice. Passengers see pilots in full uniform but remain blissfully ignorant of the attendant risks of being flown by one captain and his apprentice. While statistics reveal the risk of mishaps are incredibly low, they don't reveal the tensions on the flight deck that happen daily all over the world when a captain is crewed with a low hour barely out of flying school second in command.

More recently, the dire economic situation in UK has affected banks and it is now harder for trainee pilots to obtain bank finance. This has begun to affect the recruiting of low hour cadets into major low cost airlines such as Ryan Air. However, there will always be trainee pilots who are funded by their parents or have other income sources and this will enable airlines relying heavily on low hour recruits to still crew their aircraft

I believe that in Australia there will always be experienced general aviation pilots only too happy to join an airline as first officer. Most pilots want to be airline pilots. They dream of exotic destinations and beautiful air hostesses. Within Australia there are hundreds of pilots flying charter day and night through thunderstorms and fine weather and often in old worn out planes that need a good servicing. But the experience they gain under these conditions is priceless. By the time they are accepted by one of the well known airlines as first officers on a Boeing or Airbus, they have weathered the storms and grown wiser and more cautious. It is these pilots who make the ideal second in command.

The cadet schemes may throw up young pilots with good technical knowledge - enough to be legally acceptable to be second in command. They quickly pick up the keyboard skills vital to the operation of the automatic pilot. Their pure flying skills are lacking because of the accent placed by airlines on full use of the automatic pilot. But these cadet pilots, for no fault of their own, lack the maturity and exposure of command time. There there is no substitute for experience and cost cutting should not be allowed to influence flight safety. The remoteness of Australia from the world of overseas aviation means pilots rarely hear of overseas accidents and incidents through official channels. Mostly the information is gleaned on the internet through pilot websites such as the UK Professional Pilot Rumour Network or PPRUNE www.pprune.org.uk I know from talking to CASA flight operations inspectors that they too, closely monitor this website to pick up aviation intelligence.

There are pilots and operations managers who scorn the Pprune website as just another social net-working website. They forget that in PPRUNE website pages we hear first hand up to date accounts – admittedly often anecdotal – of what really goes on in the flight decks of airliners. There are too many incidents to be laughed off as isolated and not worthy of our attention. Stories of the low hour second in command on big jets and personal conversations with captains I have trained in years past, certainly has alerted this writer to this growing problem where cost cutting has priority over flight safety.

In Australia, we have always been blessed with a large pool of experienced general aviation pilots, topped up by a steady stream of young newly graduated commercial pilots willing to travel to find a charter job somewhere in Australia. These are the airline pilots of the future. We should not be crewing airliners with inexperienced first officers directly out of flying school simply for cost cutting purposes, especially when there is no shortage of suitably qualified experienced pilots to do the job. Airlines use the excuse that hiring cadet pilots straight from flying school prevents these pilots from learning bad habits in general aviation and right from the word go allows these cadets to be indoctrinated into the host airline operational procedures.

That argument is specious. All recruits, regardless of experience, undergo many weeks of training on aircraft and procedures common to that airline. These are called Standard Operating Procedures – or SOP's. Examinations must be passed involving detailed knowledge of the airline SOP's. No matter the original background of the pilot recruit – be it RAAF, general aviation, corporate aviation or cadet straight from flying school – each has to pass company examinations. So called bad habits (if any) are soon rectified in class and in the flight simulator.

A ship's officer, to qualify as First Mate (second in command) of an ocean going vessel, requires several years of actual sea going time. The reason is obvious. The skies can be equally unforgiving as the sea and while lifeboats are handy if a ship goes down, airliner passengers don't have parachutes. Yet, the second in command of a jet airliner can qualify within a few months out of flying school. Because this happens overseas is no reason why it should be acceptable in Australia.

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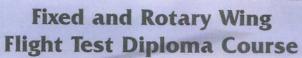
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