

Pilot Career Initiative (PCI) Submission on Pilot Training and Airline Safety Including Consideration of the Transport Safety Investigation Amendment Bill 2010

November 5, 2011

Committee Secretary
Senate Standing Committee on Rural Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Submitted: As MS Word file with enclosures attached to email to rat.sen@aph.gov.au

Subject: Comments on "Pilot Training and Airline Safety Including Consideration of the Transport Safety Investigation Amendment Bill 2010"

Gentlemen:

Pilot Career Initiative (PCI) is an Ad Hoc group of aviation professionals represented by U.S. airline executives and training management as well as professional aviation training organizations, aircraft manufacturers, aviation colleges and universities and training device manufacturers. Two members of PCI recently served on the FAA Administrator's First Officer Qualification Advisory Rulemaking Committee (FOQ ARC).

PCI respectfully provides the following submission on the Subject Amendment Bill 2010. Our comments are organized in accordance with the outline (a) through (j) found on your web page http://www.aph.gov.au/Senate/committee/rat_ctte/pilots_2010/info.htm. Our comments are confined to items (a), (b), and (c), with the item repeated in italics; our comments are shown in normal type. We realize our comments are filed after the published deadline of October 28, and beg your indulgence since this matter came to our attention only two days ago.

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

PCI supports the idea that experience and training have an affect on safety. The quantity of flight hours may or may not include flying that has relevance to operation by first officers in public transport services. Training can be specifically designed to prepare a first officer for operation in public transport services. We believe the training component provides the best focused opportunity to emphasize a high quality, scenario-based, crew-oriented training program that will provide the skills, knowledge, and attitude necessary for public transport service operations.

(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;

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The Amendment Bill 2010 contains references to the “United States of America’s Federal Aviation Administration Extension Act of 2010” which, in turn, contains references to “1500 flight hours” and the “Air Transport Pilot certificate” before a pilot is able to operate on regular public transport services. This bill, referred to as HR 5900 and/or as Public Law 111-216, also contains provisions as follows: “(d) CREDIT TOWARD FLIGHT HOURS.—The Administrator may allow specific academic training courses, beyond those required under subsection (b)(2), to be credited toward the total flight hours required under subsection (c). The Administrator may allow such credit based on a determination by the Administrator that allowing a pilot to take specific academic training courses will enhance safety more than requiring the pilot to fully comply with the flight hours requirement.” This important legislative provision permits the FAA to implement the legislation through rule(s) that allow a reduction of logged actual flight time from the referenced 1500 hours as a function of the type of education and training received by the pilot student.

Just prior to the passage of Public Law 111-216, the FAA convened a First Officer Aviation Qualifications Advisory Committee (FOQ ARC) to address the specifics of the anticipated legislation. The following nine organizations provided subject matter experts for the FOQ ARC: Aviation Accreditation Board International (AABI), Aircraft Owners and Pilots Association (AOPA), Airline Pilots Association (ALPA), Air Transport Association of America (ATA), Coalition of Airline Pilots Associations (CAPA), National Air Disaster Alliance/Foundation (NADA/F), National Business Aviation Association (NBAA), Pilot Career Initiative (PCI), and Regional Airline Association (RAA).

During the deliberations of the FOQ ARC, a research study known as the “Pilot Source Study” was considered along with additional data on first officer qualification competency demonstrated during indoctrination of pilot candidates. A consortium of seven universities prepared the Pilot Source Study with access to human resource data on the performance of more than 2000 first officer candidates at six airlines. A further, more detailed, research project called Pilot Source Study 2 is underway at this time.

The FAA has not released the FOQ ARC report, however we anticipate it will be released about January 2011 concurrent with a Notice of Proposed Rulemaking (NPRM) that will ask for public comment on proposed rulemaking regarding first officer qualifications. Given the provisions for aviation education credit in the legislation enacted as Public Law 111-216, it is premature for any national legislation or rulemaking concerning pilot qualification to cite precedent actions by the FAA at least until such a NPRM is released, and preferably after a final rule is published.

The above legislation and rulemaking affects training of pilots in the US subsequent to the period after a new rule becomes enacted and applied. In current practice, the number of hours that a new first officer may have logged prior to employment varies widely, both in the US and worldwide. In Europe, a number of airlines recruit young first officer candidates and train them exclusively for airline operations in company-designed and sponsored programs. These programs start trainee orientation for crew-

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based airline operations from the first day of training and graduate first officers into 737 or equivalent aircraft with less than 300 flight hours. ICAO and a number of member states are pioneering a Multi-crew Pilot License (MPL) concept that employs scientifically designed high quality, scenario-based, crew-oriented training; it also can graduate first officers into A320, 737 or equivalent aircraft with less than 300 flight hours. It is reasonable to forecast that MPL will become a significant world-wide if not dominant means of preparing first officers for public transport services in the future. Therefore ICAO member states should not create regulations legislating arbitrary minimum flight hour requirements that provide no safety benefit to the public, and preclude realization of benefits from the safety aspects of MPL training.

In the US, university and structured academy programs graduate students with between 250 and 400 flight hours; they typically are employed by regional airlines and begin their professional careers in Embraer or Canadair regional jets. In some market conditions, these pilots are hired at graduation. When demand is low, many of these pilot candidates instruct for their institutions or at large, and acquire more flight hours while waiting for employment opportunity. The new first officer rules to be enacted as a result of recent legislation may have an impact on both the training programs and flight hours for initial employment. Details of the competencies and means of crediting academic training toward the 1500 hours are contained in the report submitted by the FOC ARC; they have not yet been released to the public. We expect the NPRM to be released about January 2011 to contain this information.

In spite of the above variability, safety of operations all over the world has been excellent, and no accidents of which we are aware have been attributed to the pre-employment experience. The fact is, airlines around the world, including in Australia, do an excellent job of assessing candidate pilot capability and through selection processes, supplementary indoctrination training, and supervised flying, provide the public with the safest mode of transportation available.

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

Recruiting of new pilots by industry is fundamentally a labor market practice. As new airplanes are introduced and older pilots retire, a demand emerges for pilots to serve as first officers while the more experienced first officers in any particular operation are promoted to captain status. The reference to “pay-for-training” implying a relationship to safety is inaccurate and, indeed, inappropriate. The cost of training new pilots must be born by some entity, and the practice varies widely across the globe. In the examples cited above, the European practice involves airline sponsorship, usually associated with a bonded obligation for the pilot to remain with the airline for a specified period of time. In the US, the cost of initial training is usually born by the student or families, often supported by discounted through scholarships or supported by personal/family loans. There is no evidence that the method of financing flight training bears any effect on flight safety. The MPL model might have any number of training cost coverage

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financial models, none of which will impact the quality of the training, the preparation of the first officer candidates, or the safety of the public.

The issue we consider most urgent for consideration in this Amendment is the arbitrary legislation of an imposed flight hour requirement for preparation of first officer candidates. It will have unintended consequences of discouraging the best potential pilot applicants from pursuing this career path, it will deprive the industry of the safety that comes from carefully crafted, scientifically designed, crew-based training that is embedded in many university, academy, and MPL programs.

Thank you for the opportunity to comment on the Amendment Bill 2010, we hope our input has been of value in your deliberations. Should you require more information, or request direct testimony to any governmental body, please do not hesitate to contact us. Our primary contact for additional information would be to the undersigned chair of PCI,
John A. O'Brien _____

Sincerely,

Captain John A. O'Brien
Chair, Pilot Career Initiative