



Level 2, Northtown Towers  
280 Flinders Mall, Townsville  
PO Box 5251, Townsville Qld 4810  
07 4721 5151  
westwing@westwing.com.au

## **SENATE SUBMISSION - Pilot Training and airline safety**

West Wing Aviation employs 40 pilots in the GA sector in aircraft ranging from light twins to 19 seat twin turbine aircraft in both the Charter and RPT categories.

While this enquiry appears to be aimed at the heavier end of the RPT operation, the consequences for the middle level operator could be significant as there is apparent confusion in the enquiry terms between proposed US FAA rules and the application to Australian RPT (Regular Public Transport) operations.

The US FAA Pilot Training and Safety Provisions refers to minimum flight hours to hold an ATP (Air Transport Pilot) certificate which is the equivalent of the Australian ATPL (Air Transport Pilot Licence), whereas the enquiry terms suggest the minimum hours be applied in Australia to all RPT operations, not the ATP licence.

### ***(a) Pilot experience requirements and the consequences of any reduction in flight hour requirements on safety***

1500 hrs does not guarantee a proficient RPT pilot. The proposition is way too simplistic.

There is no Practical Flight Test for an ATPL. A candidate only has to pass the theory exams and meet the minimum flight times to be issued with an ATPL. I can only surmise that it is assumed by the authority that any pilot who is then employed as a pilot in a role requiring an ATPL, that the pilot's ability will be tested and checked as meeting a satisfactory flight standard by the operator. In some organisations the operator's Check and Trainers may come under pressure from management to pass candidates to provide flight crew to meet short term requirements.

I have trained pilots with less than 1000hrs who I consider would be more than capable of flying PIC multi-crew heavy aircraft. I have also tested and rejected pilots with well over 1500 hrs and an ATPL who I wouldn't put in command of our smallest aircraft.

Command flight hours lodged as an instructor in a small two seat training aircraft is nowhere near equivalent to experience gained in the co-pilot seat on multi-crew operations of a twin turbine type.

The requirement should be based on demonstrated ability to carry out the piloting role and should include minimum experience requirements in a graduated scale for various aircraft seat capacities in the 19, 33, 48 and above seat ranges and not apply at all to aircraft under 5700kg.

***(b) The US FAA minimum 1500 hours before a pilot is able to operate on regular public transport services and whether a similar mandatory requirement should be applied in Australia***

The US FAA proposal IS NOT the minimum hours for a pilot to operate Regular Public Transport operations, but is the proposed minimum requirements for a pilot to hold an ATP certificate, i.e. pilot licence.

In Australia the requirement is to have an ATPL to be Pilot-In-Command on Multi-Crew operations in aircraft above 5700kg. A pilot holding a CPL may operate RPT aircraft under 5700kg.

West Wing, for example, operates RPT services in single pilot light twin piston engine aircraft and single engine turbine aircraft below 5700kg that do not require a pilot to hold an ATPL.

An all encompassing, regulation referring to RPT requiring pilots to have ATPL and 1500hrs intended for larger aircraft would decimate an entire section of the industry and deny services to the remote communities currently served by operators such as ourselves.

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

West Wing Aviation is in the mid range of pilot career moves. As soon as they reach the ATPL minimum time they apply to regionals and airlines

Unfortunately on several occasions, pilots have been employed and given an expensive endorsement and instrument rating renewal and then simply quit the next day. Bond agreements we had in place, have been challenged in court and under new industrial relations laws, are not effective. An operator in the GA sector cannot afford this.

Pay for training schemes have to be considered, however there is an expectation that if the trainee is paying for the training, that the trainee will pass.

Pilot remuneration is a safety issue and should be addressed as such by regulation. As recently demonstrated in the US, it is just as important as other stress factors such as bereavement, divorce or separation, etc. A pilot under financial stress is a safety risk. I have seen pilots in the GA sector in remote areas, working late hours in bars and then turn up for a charter flight at 6 am and being paid on a casual pay rate for time flown not duty time.

**(d) Retention of experienced pilots**

Our position in the industry is the equivalent of a Tertiary education institution. On average we take a 2 year experienced pilot with just over 1000hrs, with limited IFR exposure or recency, usually poor radio procedures and limited CTR experience and then have to extensively train them in all these deficient areas as well as the new concepts of flight check systems, multi-crew procedures and usually their first turbine endorsement, all very time consuming and expensive in instruction time and aircraft time as well.

The problem is, it is very difficult to retain Check and Training pilots in the GA sector and the pool of experience has decreased. Status as a Tertiary training provider with adequate funding support would assist to attract and maintain more experienced pilots in the sector.

**(e) Type rating and recurrent training for pilots**

Type rating is an American term not used in Australia.

Overall the requirements of CAO 40.1.5 regarding recurrent training of RPT pilots encompasses the proposed FAA changes so we already meet that requirement but whether the actual standard is being observed or achieved is the question that should be addressed.

**(f) The capacity of CASA to appropriately oversee and update safety regulations given the ongoing and rapid development of new technologies and skills shortages in the aviation sector.**

It is understood that CASA, not unlike industry, operates within a finite, limited budget. However, this budget appears to also limit the opportunity for FOI's, who were recruited because of their experience as pilots/instructors, to maintain recency and currency on the aircraft types that they oversee. These limitations inevitably lead to frustrations which sometimes manifest in a less than optimal relationship with operators and the application of pedantic conditions or rule interpretations.

We are all living and operating in an increasingly litigious society and as a result it appears that FOI's are unwilling to make any decision, common sense or otherwise that by any remote possibility, may come back and bite them. We believe that this is exacerbated by the loss of recency, understanding and sympathy with the practicalities of piloting.

The lack of consistency between FOI's and areas has been dealt with before and has still not improved.

The oversight of flying operations would be enhanced by applying the US system of appointing Designated Airman Examiners who may in fact be current check pilots for another company operating the same aircraft type, or a check pilot contractor who is current on the type and who understand the realities of line flying and stays current with developments.

***(g) The need to provide legislative immunity to pilots and other flight crew who report on safety matters and whether the US or Euro, approaches would be appropriate in the Australian aviation environment.***

Essential. There now appears to be a tendency for the local cop to show up at an aircraft accident site and decide to declare it a crime scene so they can get access to documents and even Flight data and Cockpit Voice recordings. I understand that even the ATSB can't get access without the OK from the police.

No-one is going to submit a report if it can be turned into an incrimination. The American system where a person can lodge an incident report and admit to a mistake and be somewhat protected from prosecution (except where it was deemed to be done to cover a deliberate act), is the way to go.

***(h) Reporting of incidents to aviation authorities by pilots, crew and operators and the handling of those reports by the authorities ...***

While we have enjoyed a good relationship with the CASA we are aware that some operators believe that reporting incidents to CASA (in the interests of improving air safety) is like putting your head in a noose. The next thing you get is a fault finding inquisition and a threat of prosecution. No wonder it's considered by some, better to stay quiet and hope they may not hear about it from another source. There is a clear mistrust of the regulator.

The basis for deciding on investigation by both CASA and ATSB, appears to have more to do with media coverage than the serious nature of the incident.

Adrian Billing  
Chief Pilot  
West Wing Aviation