

*Allen Hilton*

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28<sup>th</sup> August 2019

Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and Transport  
P. O. Box 6100  
Parliament House  
Canberra ACT 2600

*ATSB report on - Collision with terrain involving SOCATA TB-10 Tobago, VH-YTM, near Mount Gambier Airport, South Australia, on 28 June 2017*

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Dear Senators / Committee Secretary

I wish to make the following brief submission in relation to the ATSB Final Report released following Investigation AO-2017-069.

1. Personal details:

- Private pilot PPL(A) with Single Engine Command Instrument Rating
- ARN 568695
- 20 years flying experience
- 10 years volunteer pilot for Angel Flight – 2009 to present
- 280 Angel Flights completed

2. I question a number of the statements and published comments contained within the ATSB Report:

- “This ATSB investigation further established that community service flights conducted on behalf of Angel Flight Australia (Angel Flight) had substantially more occurrences, accidents and fatal accidents per flight than other private operations (including that the fatal accident rate was more than seven times higher per flight than other private flights).”

Clearly this statement is statistically flawed and cannot be justified when taken into account in excess of 46000 flights that I’m aware of that Angel Flight has coordinated and safely conducted since commencing these charitable flights in April 2003.

- The ATSB found that the pilot took off in low-level cloud without proficiency for flight in instrument meteorological conditions. Shortly after take-off, the pilot likely lost visual cues and probably became spatially disorientated, resulting in loss of control of the aircraft and collision with terrain.

The ATSB has investigated numerous accidents over many, many years with the same or similar scenario to that outlined above. The cause and conclusion is sadly nearly always the same. Poor decision making on the part of the pilot in command - PIC, associated with a lack of adequate training for flight in instrument meteorological conditions - IMC.

Decision making by the PIC is critical to the safe outcome of any flight. The inbound arrival flight path clearly demonstrates this pilot had already made some poor decisions that could have been avoided. Mentoring, IFR training and an appreciation and understanding of the prevailing weather conditions, plus greater experience would likely have avoided the need for any investigation.

- Angel Flight had insufficient controls in place, and provided inadequate guidance to pilots for addressing the additional operational risks associated with community service flights.

I strongly disagree with this statement. During my 10 years and 280 Angel Flights I have consistently had communication with the various Flight Coordinators. This has normally occurred both pre and post flight. Assurances are always given by the Flight Coordinators, generally within the 24 hrs pre flight that should there be any issues - to contact them and other arrangements will be made. I have never experienced any pressure or perceived expectation to conduct a flight. In fact, I have cancelled or had cancelled in the order of 50 Angel Flights during the 10 years, predominately due to unsuitable weather forecasts or conditions such as turbulence.

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## 2. Comment in Summary:

- The practicality of utilizing commercial flights for the majority of Angel Flights as proposed by the ATSB is unrealistic. From my observation during the flights I have conducted I could list multiple examples where the improbable option of a patient traveling commercially is not feasible.. The chain of airline schedules, remote locations, timing of medical appointments, patients' health, dislocation of rural families and the like cannot be factored in to the absolute benefit provided by an Angel Flight.
- The ATSB statement ..... (including that the fatal accident rate was more than seven times higher per flight than other private flights)." I urge the Senate Committee to investigate the validity of such a profound conclusion. Clearly, logically this is not correct and the ATSB has formulated a statistic for an 'impact statement' to add some credence to their report.
- CASA as a reaction in March and April 2019 introduced: **Community service flights – new minimum safety standards – and Conditions on Flight Crew Licences.** I consider the great benefit of pilot mentoring has been negatively impacted as a result of this Instrument, either intentionally or as an unintended consequence. To engage the experience and expertise of another pilot or, conversely to share duties with a pilot of limited experience should be encouraged where circumstances allow. Decision making on the part of the pilot was obviously the catalyst to the accident investigated by the ATSB.

I thank you for taking the time to review my submission.

Kind regards,

Allen Hilton