The Coalition of Airline Pilots Associations

April 9, 2010

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor
Room W12-140
Washington, DC 20590

RE: Comments on NMRPM FAA-2010-0100 "New Pilot Certification Requirements for Air Carrier Operations"

Dear Sir/Madam:

The Coalition of Airline Pilots Associations (CAPA) appreciates the opportunity to comment on the New Pilot Certification Requirement for Air Carrier Operations Advance Notice of Proposed Rulemaking (ANPRM 0100) and respectfully submits its comments on this letter.

CAPA represents over 28,000 pilots at carriers including American Airlines, UPS, Southwest Airlines, US Airways, ABX Air, NetJets, Atlas Air, Polar Air Cargo, Southern Air and Kalitta Air.

The officers and pilot members of CAPA are all currently qualified at member airlines and offer a unique, unequaled perspective of the requirements, abilities, and training necessary to be either a Pilot-in-Command (PIC) or Second-in-Command (SIC) in US airline operations. CAPA is committed to addressing the regulatory issues affecting the crewmember – and the safety of the flying public.

Background:

Historically, US airlines flying passengers operating complex high-performance aircraft could choose from a highly experienced applicant pool and require thousands of hours of flying time. Over the last nine years the experience levels of new-hire pilots in transport category aircraft has diminished substantially. Flying commercial passenger airlines is now an entry-level position for many pilots.

Traditionally, airline pilot positions were highly coveted. As the compensation and benefits in the industry have been dramatically reduced, the experience level of the pilot applicant pool has diminished. Lack of incentives have kept experienced furloughed pilots from returning and has

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prompted many experienced airline pilots to leave the profession. Furthermore, experienced military pilots are choosing to either stay in the military or seek other avenues of employment.

The recent trend in outsourcing of major airline flying to regional affiliates has become a large component of the major airlines' business model. The regional airlines compete against each other for routes offered by the major airlines by "bidding" against one another. As a result, there are strong incentives to lower labor and maintenance costs, and not utilize proven industry safety programs such as ASAP, FOQA, and SMS. This business practice essentially outsources highly-qualified, highly-experienced pilot jobs to pilots with extremely limited experience just entering the industry which severely compromises the safety of the flying public.

The proliferation of regional airline affiliates and their need to hire pilot labor at the lowest possible cost has brought about a race to the bottom. Current regulations permit an 18 year-old pilot with only 190 hours of total flight hours and 5 hours of night experience to fly US passenger airliners. A pilot with so little experience and qualifications should not be charged with the responsibility of 50, 70, or even 100 passengers, piloting a highly complex aircraft in a congested air traffic control system.

CAPA recommends regulatory reform in licensing and training requirements for Part 121 operations to reflect sufficient real world flying experience, decision making, and proficiency to allow for a minimal difference in capabilities between Captains and First Officers. These training and proficiency goals must be able to support the demands of non-normal flight and irregular flight operations.

With the adoption of Crew Resource Management (CRM), First Officers are an integral part in the operation of aircraft and have specific duties and responsibilities. They are also accountable to the FAA and subject to violation. With the advent of technologically advanced cockpits and operations in traffic saturated airspace, CAPA proposes that both the Captain and the First Officer be Airline Transport Pilot (ATP) rated as a minimum qualification and that training be expanded to include high altitude, icing, and other real-world variables in order to carry passengers in FAR 121 airline operations.

Supporting Points:

- Every US Major airline requires new-hire pilot flight experience in excess than the requirements of the Airline Transport Pilot (ATP) certification; regional airlines do not.
- "One Level of Safety" dictates the same experience levels throughout the air transportation system.
- Over 50% of US domestic flights are operated by regional air carriers.
- Regional airlines fly at the same speeds and same altitudes as the major airlines.
- Regional airliners fly into the same congested airports in our nation's biggest cities.
- Cockpits of regional aircraft are now just as complex and sophisticated as the cockpits of the aircraft operated by the major airlines.

- Unlike years past, through the advent of Crew Resource Management (CRM), First Officers now have specialized and specific duties for which they are "Responsible and Accountable."

- Four of the last five fatal airline accidents have involved regional carriers.

- The accident rate among FAA-rated Commercial pilots ***without*** an Airline Transport Pilot (ATP) certificate over (3) three times greater than pilots who possess an ATP.

- Commercial pilots account for 32.7% of total accidents vs. Airline Transport Pilots 10.1%. *Source: 2006 Nall Report – General Aviation accident rate*.

- Airmanship skills are not only taught through good training, they are developed and honed over time.

- Flying aircraft of any size develops airmanship skills. For example, a pilot flying small single engine aircraft at low speeds and altitudes, over time develops excellent airmanship skills. For that same pilot learning the systems and procedures for transition into sophisticated aircraft is confidently made since there is a well established foundation of flying skills. This concept of progression is well-defined in the FAA approved Advanced Qualification Programs (AQP Training Programs) used throughout the major airlines. Under AQP, pilots entering a new or different type aircraft are first tested in flying skills and maneuvers utilizing the new aircraft. Only after flying skills and maneuvers are successfully demonstrated is a pilot then trained for utilizing the automation relative to the operation of the aircraft. In summary, a pilot that has developed excellent flying skills is prepared to easily transition into automated aircraft.

- Judgment is not only developed through good training, like airmanship skills, it is practiced and enhanced over time.

- Knowledge is transferable through training.

- *Experience is not transferable.*

The following comments are in response to the questions in the ANPRM2010-0100:

1A. Should the FAA require all pilot crewmembers engaged in part 121 air carrier operations to hold an ATP certificate? Why or why not?

Yes, CAPA recommends the Airline Transport Pilot (ATP) certificate as the minimum standard for employment as a pilot with a Part 121 air carrier. The ATP provides the academic coursework, flight training, and experience needed for the safe piloting of today's complex high-speed aircraft through a congested, multifaceted air traffic control network in all weather environments. Major air carriers require the ATP for employment and "one level of safety" dictates that all air carriers, regional or otherwise, should require the ATP as well. The flight experience required by the ATP, along with the several

other associated experience-based FAA mandated prerequisites, develops a mature, experienced, and professional aviator who has the foundation to exercise prudent judgment while responsible for the safe transportation of tens or even hundreds of passengers.

- Entry-level First Officers have immediate flying duties; and like the Captain, are as responsible for the safe operation of the aircraft;
- ATP requires 500 cross-country flight hours, 100 night hours;
- ATP check ride is tailored to commercial operations at large airports;
- Achieving the ATP requires more evaluation check rides and generates more performance documentation;
- Acquiring an ATP allows time for a pilot to serve an apprenticeship where he/she can develop better airmanship skills;
- Spatial orientation, physiological factors, and situational awareness are finely honed with more flight time;
- Commercial pilot (only) licensed aviators account for 3x the accidents as ATP licensed pilots;
- 50% of US domestic flights are flown by Regional Carriers; and
- "Quantity" of flight hours have a "Quality" of its' own.

The current minimum hiring requirement for US commercial part 121 operators is 250 flight hours, a commercial pilot license and an instrument rating. These basic qualifications can be attained in 12 months. Most professionals serve apprenticeships. For example, a doctor must complete undergraduate study, medical school, residency and pass board certified exams before practicing as a doctor. Part 121 pilots should be required to have similar extensive training, practical experience, and qualifications.

The experience and knowledge requirements of an ATP certificate help assure the traveling public that their pilot is prepared for the rigors of airline flying and is the ***minimum*** level to safely operate a ***transport*** category aircraft without placing the airman in an "on-the-job-training" environment.

1B. ***If a part 121 air carrier pilot does not hold an ATP certificate, should he or she nevertheless be required to meet the ATP certificate aeronautical knowledge and experience requirements of § 61.159, even if he or she is serving as SIC? Why or why not?***

Yes, the experience and knowledge requirements of the ATP certificate should be required; therefore, there is no reason not to require the airman to hold the ATP certificate. The SIC must be fully prepared to assist the PIC in all phases of the flight including decision making in both normal and abnormal situations. The SIC may be required to

safely fly an approach and land the aircraft, under the worst possible conditions and with an incapacitated PIC. The ATP assures that this pilot will have the experience necessary to perform this task.

Meeting the aeronautical and experience requirements is the first step in the certification process; demonstrating that knowledge and experience to obtain an ATP certificate must be the next step.

2A. ***Are aviation/pilot graduates from accredited aviation university degree programs likely to have a more solid academic knowledge base than other pilots hired for air carrier operations? Why or why not?***

No, from an academic perspective a graduate from an aviation university will not necessarily have a more solid academic knowledge base. Many of today's senior airline pilots have post graduate degrees in fields such as medicine, law, finance and engineering and have approached their academic aeronautical training with the same vigor. In addition, airlines have reported that graduates of aviation universities have not shown any advantages over pilots that have a solid foundation operating aircraft under Part 135. In any case, greater academic knowledge does not serve as a substitute for practical experience.

The safe operation of complex passenger-carrying aircraft cannot be entirely learned in a classroom environment. Newly trained pilots must have the opportunity to "practice" their lessons in a less challenging environment without putting the traveling public at risk. The ATP requirement allows the student the opportunity to develop their airmanship skills before advancing to the highest levels of the industry. Upon graduation from any flight school, a pilot would be considered a good student of aviation, not a seasoned pilot ready to fly complex aircraft for hire.

2B. ***Should the FAA consider crediting specific academic study in lieu of flight hour requirements? If so, what kind of academic study should the FAA accept, and to what extent should academic study (e.g., possession of an aviation degree from an accredited four-year aviation program) substitute for flight hours or types of operating experience?***

No, academics can hardly substitute for practical experience. While certain courses of study may provide a foundation of understanding, no amount of theoretical or classroom-oriented study can serve as a substitute for practical experience. Most professional occupations require a level of practical experience before reaching certification. Medical doctors, lawyers, and engineers are only a few examples of this. The value of time spent in practical application of the lessons learned in the classroom is considered a part of their maturation process. While education is absolutely necessary, also is the time spent applying the lessons learned in a practical setting. No short-cutting of this process should be contemplated.

2C. ***If the FAA were to credit academic study (e.g., possession of an aviation degree from an accredited four-year aviation program and/or completion of specific courses), should the agency still require a minimum number of flight hours for part 121 air carrier operations? Some have suggested that, regardless of academic training, the FAA should require a minimum of 750 hours for a commercial pilot to serve as SIC in part 121 operations. Is this number too high, or too low, and why?***

The FAA has always and should continue to require a minimum number of flight hours for Part 121 air carrier operations. However, the "suggested" 750 hour minimum is woefully inadequate to guarantee that a pilot is capable of performing the duties required in today's airline environment. The minimum flight hours set forth in FAR Part 61, Subpart G, Airline Transport Pilots, are merely *minimum* certification requirements. There should be no credit for academic study to further reduce these minimums.

There is no substitute for flight hours. The many practical lessons learned in the first 1,000-2,000 hours of flight, regardless of what type of aircraft being flown, provides invaluable experience to a pilot's career. A thoroughly trained and experienced pilot must be the goal for an airline's new-hire applicant screening. Reducing the minimum hours is counterproductive towards this goal and produces an avoidable and unnecessary risk to the traveling public.

3A. ***Should the FAA propose a new commercial pilot certificate endorsement that would be required for a pilot to serve as a required pilot in part 121 air carrier operations? Why or why not?***

No, CAPA does not support an endorsement to a commercial pilot certificate as it does not ensure the pilot is ATP qualified. An individual serving as a required pilot in Part 121 air carrier operations should meet the certification requirements of FAR part 61, Subpart G, Airline Transport Pilots. Entry-level First Officers have immediate flying duties and are responsible as Captains for the safe operation of the aircraft. In addition, the tenets of modern crew concept developed over the last 20 years require two engaged, trained, capable airline pilots in the cockpit. There is no place for an "on-the-job training" environment. The hour and knowledge requirements of this certificate help assure the traveling public the pilot is prepared for the rigors of airline flying.

3B. ***If so, what kinds of specific ground and flight training should the endorsement include?***

Specific ground or flight training cannot take the place of flight hour experience gained by earning an ATP certificate.

3C. ***The FAA expects that a new endorsement would include additional flight hour requirements. At a minimum, the FAA requests comments on how many hours should be required beyond the minimum hours needed to qualify for a commercial pilot certificate. Some have suggested that the FAA require a minimum of 750 hours***

for a commercial pilot to serve as SIC in part 121 operations. Is this number too high, or too low, and why?

CAPA does not support endorsements that fall short of training and experience levels required by the ATP. To serve as a Captain or First Officer on a Part 121 aircraft a pilot should be required to have an ATP certificate. As stated above, the modern airline cockpit in today's environment is not a training ground for new recruits, as it was 50 years ago. Two trained capable **Airline Transport Pilots** are required to fly modern jet aircraft and both should be required to demonstrate their proficiencies by holding an **Airline Transport Pilot (ATP) certificate**.

3D. ***The FAA is considering proposing to require operating experience in a crew environment, in icing conditions, and at high altitude operations. What additional types of operating experience should an endorsement require?***

To gain practical knowledge of line operations, all new-hire pilots should be required to fly on line-flights (in the jump seat) for a period of 2-4 months prior to being assigned to line flying. This experience would allow newly hired pilots to experience, as a flight engineer once did, the practical aspects of the position they are about to perform. The prospective pilot would have the opportunity to gain knowledge of the many company specific procedures and processes that cannot be taught in a simulator or ground school. In addition, a good basic foundation of Cockpit Resource Management (CRM) skills needs to be included in any training curriculum requirements. CRM is the basis of the principles of modern crew concept and a prospective pilot's responsibilities within CRM must be clearly conveyed and understood.

3E. ***Should the FAA credit academic training (e.g., a university-awarded aviation degree) toward such an endorsement and, if so, how might the credit be awarded against flight time or operating experience? We are especially interested in comments on how to balance credit for academic training against the need for practical operating experience in certain meteorological conditions (e.g., icing), in high-altitude operations, and in the multi-crew environment.***

Academic training certainly would enhance a pilot's knowledge. It cannot, however, be a substitute for actual experience. Academic training does not give the student the real-world practical experience required to perform this work without the program becoming cost prohibitive. CAPA believes there is no balance between academics and experience. The safest and most complete method would be to require both in a pilot's educational development.

4A. ***Would a carrier-specific additional authorization on an existing pilot certificate improve the safety of part 121 operations? Why or why not?***

Yes, our answer assumes that an ATP would be a prerequisite to this higher level certificate. This additional authorization would be helpful in improving safety. Anytime a pilot can be trained in specific tasks and environments, preferably in actual operating conditions as well as a classroom setting, he/she will be a safer pilot. It should not be used

as a substitute to reduce the minimum ATP requirements. As representatives of 28,000 professional airline pilots, CAPA believes that the ATP standard is only the starting point in a pilot's educational development.

4B. ***Should the authorization apply only to a pilot who holds a commercial certificate, or should it also apply to the holder of an ATP certificate?***

The Airline Transport Pilot (ATP) certificate ***must*** be a prerequisite. An additional authorization to the ATP certificate would be entirely appropriate.

4C. ***Should such an authorization require a minimum number of flight hours? If so, how many hours should be required?***

Yes, provided the ATP is a prerequisite to this certificate. CAPA believes that the "carrier-specific authorization" could be obtained through a specified minimum number of classroom hours.

5A. ***Can existing monitoring, evaluation, information collection requirements, and enforcement associated with pilot performance be modified to improve pilot performance?***

Current data collection programs such as FOQA, LOSA and ASAP are sufficient for acquiring the raw data. It is imperative that these programs be utilized to identify the root causes of aviation accidents and incidents. To do otherwise is to identify the symptoms of problems, and not the causes. Improvements to these programs can be made in the use and sharing of data; as long as the data is very closely protected and it's dissemination strictly controlled. SMS, if properly implemented, would be a dramatic step forward in improving utilization of collected data. However, it is imperative that no voluntary reporting program ever be used for disciplinary purposes.

5B. ***If so, what specific modifications should be considered?***

Expand and encourage voluntary implementation of ASAP, FOQA and SMS programs for all Part 121 major and regional carriers.

In summary, CAPA believes that a solid education and training experience is certainly a necessary beginning for a professional airline pilot. Equally important, the education and training must be paired with practical experience for pilots to reach their full potential.

Pilots must be given the opportunity to develop airmanship skills by spending time practicing what they learn in school and in training. Judgment skills, a vital requirement in airline cockpits, can only be developed by experience. This experience should be developed and obtained in less-challenging environments than that of a complex airline cockpit. Pilots need to advance as their skills allow, gradually moving from simpler to more complex aircraft as they are able.

In today's modern airline environment, the safety of the traveling public demands two capable, experienced airline pilots in the cockpit. CAPA believes this can only be achieved by requiring both airmen to hold an FAA Airline Transport Pilot (ATP) certificate.

We offer our assistance with expert panels and/or working groups and can provide experts to assist with your efforts. Thank you again, for allowing CAPA to comment on this important rulemaking issue.

Sincerely,

Captain Paul A. Onorato
President