

**Society of Aviation and Flight Educators**  
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Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

Comment on Notice of Proposed Rule Making. Docket FAA-2010-0100.

The Society of Aviation and Flight Educators (SAFE) respectfully submits the following comments pertaining to proposed changes to Airline Transport Pilot (ATP) certificate regulations.

**The nature of SAFE, the commenting organization:**

These comments are provided by the Society of Aviation and Flight Educators. SAFE is one of the nation's pre-eminent organizations of aviation educators whose expertise covers the entire spectrum of flight training from student through Airline Transport Pilot. Our over 700 members include Master CFI's, FAA Designated Pilot Examiners, FAASTeam Safety Program Managers and Representatives, FAA Gold Seal instructors, professors and administrators from numerous college and university aviation programs, and both professional and general aviation pilots. SAFE and its members are committed to enhancing aviation safety through the development of professional standards in aviation education and delivery of the highest quality flight instruction possible.

**Issues addressed:**

It appears to us that FAA's Notice of Proposed Rulemaking can be reduced to four primary topics:

1. Should all pilots who transport passengers be required to hold an air transport pilot (ATP) certificate with the appropriate aircraft category, class, and type ratings? This would increase the required flight experience for all air carrier pilots to a minimum of 1,500 hours.
2. Should the FAA permit academic credit in lieu of required flight hours or experience?
3. Should the FAA establish a new commercial pilot certificate endorsement that would address concerns about the operational experience of newly hired commercial pilots, require additional flight hours, and possibly credit academic training?

4. Would an air-carrier-specific authorization on an existing pilot certificate improve safety?

**SAFE's comments:**

1. Should all pilots who transport passengers be required to hold an air transport pilot (ATP) certificate with the appropriate aircraft category, class, and type ratings? This would increase the required flight experience for all air carrier pilots to a minimum of 1,500 hours.

We believe this idea has very little merit. The 1500 hour requirement is arbitrary and does not ensure Airline Transport Pilot competence. Prima facie evidence of this are the examples of:

-Military pilots with (only) several hundred hours total time who competently and safely fly extremely complex aircraft in highly demanding operations including off of and back onto moving aircraft carriers which is acknowledged as the most challenging of all aircraft operations.

-High-hour "professional" pilots who have killed themselves and hundreds of passengers by having forgotten, becoming confused by, or otherwise ignored basic flight principles that private pilot candidates are required to master. A case in point is the recent Air France Flight 447 disaster in which three pilots, all of whom had well in excess of 1,500 hours, stalled an airliner at over 30,000 feet and held it in a stall all the way to their deaths. Another case in point is the Colgan accident, attributable to the ATP rated crew, each with more than 1500 hours, failing to recognize a stall, and then failing to apply appropriate and basic corrective control inputs.

Airmanship skills are not necessarily based on number of hours flown and as the above examples show possession of an ATP certificate and 1500+ hours does not guarantee air transport safety. SAFE does not believe that requiring an ATP certificate for entry into the air carrier profession will in and of itself improve air transport safety.

SAFE strongly endorses the concept of continuing and expanding the focus on more meaningful check rides and recurrent training. Each training period should end with appropriate evaluations designed to determine the level of retention and integration of the material trained, as opposed to a pilot's ability to simply meet minimum criteria.

Pilot proficiency, not hours, should be the focus of FAA's efforts. Instead of simply establishing a minimum number of hours (quantity) SAFE believes the FAA should instead focus on improving the quality of instruction received by ATP candidates aiming at developing and maintaining a higher level of pilot proficiency both during the initial training period and after earning an ATP certificate. This will never be achieved by merely requiring additional flight hours.

2. Should the FAA permit academic credit in lieu of required flight hours or experience?

Our position on this matter is essentially the same as our position on item 1 above. If academic experiences can demonstrably produce an equally or more proficient pilot (at any certificate level) than some arbitrary number of flight hours, then we support the idea. However the focus must be on developing and maintaining high levels of proficiency rather than the current practice of a certain number of flight hours and/or classroom credits earned. While we must point out that almost all of the “additional emphasis” subject matter listed in the NPRM is already stressed in the current curriculums and PTS requirements. Deficiencies in these topics go back to our point that it is the quality of flight instruction which must be upgraded, not the quantity. SAFE concurs with the FAA’s proposal to increase the emphasis on CRM and ADM in both the academic and practical demonstration portions of all ATP training; in our opinion this currently is an area of singular weakness.

3. Should the FAA establish a new commercial pilot certificate endorsement that would address concerns about the operational experience of newly hired commercial pilots, require additional flight hours, and possibly credit academic training?

No. SAFE believes that newly-hired commercial pilots should meet specific proficiency criteria before occupying the right or left seat in air transport. Generally, we believe the criteria required by existing practical test standards are adequate. The greater issue is ensuring that pilots meet and maintain acceptable levels of competency and sound judgment. It is our belief that this is not being achieved in the current initial certification process or by the air carriers in their recurrent check rides. One only has to look again at the history of the PIC in the Colgan crash to see the extent of the industry’s internal problem in this area. A new certificate endorsement will not correct this issue. More careful, and honest air carrier evaluation of a pilot's competency and judgment, along with improved FAA oversight of this process would yield a significant improvement in weeding out pilots who cannot/will not meet the high standards of competence required for air transport safety.

4. Would an air-carrier-specific authorization on an existing pilot certificate improve safety?

No. SAFE believes that our comments on items 1, 2 & 3 above address this question.

Whereas SAFE is keenly aware that Congress, not the FAA, has mandated the requirement for first officers to hold an ATP, we would be remiss if we did not comment on what we see as a potentially highly-negative effect on all aviation safety as a result of this rule. Given that most pilots who seek to fly under Parts 121 or 135 will now need 1,500 hours of total time, a significant majority of those pilots will turn to flight instruction to gain those hours in the most economical manner.

Considering that the rule of primacy in learning (the things we learn first are the things we retain) is immutable, and considering the fact that there will be a large influx of CFI's in the flight training community who are there for the sole reason of gaining hours and not to provide quality training, SAFE feels that this will exacerbate an already poor situation of training quality and student retention, leading to an overall degradation of properly trained pilots. In an effort to meet the 1,500-hour requirement, other pilots will turn to highly-repetitive "hour building" jobs such as banner towing, pipeline patrol, etc. While those jobs build hours they usually do not expand a pilot's skill set in the areas required for safe air transport operations. Perhaps in recognition of this the FAA proposes to require an ATP to have an additional 1000 hours in air carrier operations prior to serving as PIC in a part 121 operation. As previously noted we see no established connection between the skill set required to serve as PIC in these operations and an arbitrary number of hours. Further, given the air carrier custom of mixing flight crews the level of mentoring provided by this proposal will be uneven among crews and across carriers.

While the proposals of this NPRM will not lead to the safer flight environment the FAA seeks, SAFE stands ready to work with FAA, and other interested organizations to help develop specific, meaningful evaluation criteria that can be implemented to increase safety for both air transport and general aviation operations.

We look forward to the opportunity to be a part of that discussion.

Doug Stewart, Executive Director  
SAFE (Society of Aviation and Flight Educators)