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Docket Management Facility
U.S. Department of Transportation
Docket No. FAA-2008-0677
1200 New Jersey Avenue, SE., Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

SUBJECT: Proposed Rule- Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers

Gentlemen/Madam,

The Regional Airline Association was founded in 1975 to promote the highest safety and training standards within the industry, and adherence to those best practice standards has continued to guide RAA's 30 member airlines as the regional airline industry has grown exponentially to where today regional airlines carry some 160 million passengers annually, fly more than 50 per cent of the nation's scheduled departures, and serve some 600 communities across the U.S. – a full 75% of which are served exclusively by regional airlines. It is in this context that RAA welcomes the opportunity to comment on the above-referenced NPRM.

Most importantly, RAA shares in the fundamental objective of the NPRM: to integrate and update rules crafted back in the late 1960s during the adolescence, if not the infancy, of scheduled commercial aviation with the state of the art safety and training programs that the industry and government have successfully developed over the past forty years. As we reviewed and provide the following guidance on the nearly 800 pages incorporated into the NPRM and related FAA support documents, we must recognize that over those 40 years, a whole generation of aircraft, procedures, technology, information gathering and sharing, learning and training resources and safety systems have been put into place and have proven effective in building the multi-layered approach to aviation training that exists today.

Our primary concern is that the NPRM, if implemented in its current form, could undermine if not totally stymie the tremendous progress the industry and FAA have made over the past 40 years. The NPRM's "throwback" approach is far too rigid, runs contrary to the flexibility provided under the highly regarded AQP program, and may actually conflict with the most advanced Safety Management Systems. Consider, for example, several top-line issues stemming from the NPRM as currently proposed:

- Training by its nature and definition is evolutionary, yet the NPRM distorts if not totally disregards all of the outstanding training programs that have been voluntarily

incorporated into airline training programs, such as the more than 100 enhancements identified by the Commercial Aviation Safety Team (CAST) and the highly effective Runway Safety Initiative. (Notably, RAA's Safety Committee identified as runway incursions as its #1 priority several months *before* the FAA issued its "Call to Action" in November, 2007)

- As the FAA itself acknowledged at its April 4 public meeting, the NPRM contains a significant number of "clerical errors". Yet, the NPRM under consideration still incorporates many of these "clerical errors", offering to "fix" these errors in the final rule. Training is a far too important and fundamental cornerstone of aviation safety to defer to "we'll fix it later".
- The NPRM's line-by-line rewrite of the existing rules may add to confusion, leading to inconsistent application of training practices across FAA, the industry and perhaps even within operators. This confusion and inconsistency would diminish, not enhance, the training experience.
- While the FAA proposal explicitly states that those carriers "under the current AQP training program already meet the safety improvements contained in the NPRM," the *current* pilot training regulations can also be readily integrated into AQP with a minimum of disruption to both current AQP operators and the remaining operators who are transitioning to AQP for training pilots.
- Perhaps most significantly, the NPRM could actually perpetuate the myth that some air carriers are not providing an equivalent level of safety in their pilot training programs. Since many regional carriers have opted to remain within the Part 121 subpart N regulatory framework instead of AQP, the FAA proposal continues to draw distinctions between training programs. Cementing these distinctions into additional regulation will inevitably lead to continued questions regarding the comparative effectiveness between equally effective programs – programs that pull the best from each to create a single unified airline approach to safety.

In summary, we respectfully request the NPRM be withdrawn and revised to reflect the most advanced approaches to training that have been cooperatively developed by all stakeholders – airlines, manufacturers, labor, academia and the government – that has built the industry's outstanding record over the past 40 years.

Sincerely,

Roger Cohen
President