



March 12, 2018

Dear Representative:

On February 27, 2018, the House Transportation and Infrastructure Committee, Subcommittee on Aviation held a hearing titled, “The State of Aviation Safety.” During the hearing, lawmakers and witnesses discussed the First Officer Qualification Rule. We would like to share our views on this issue and explain why we believe a proposal under consideration in the Senate would improve pilot training and enhance aviation safety.

As you know, S.1405, the Federal Aviation Administration (FAA) Reauthorization Act of 2017, includes a provision that would clarify FAA’s authority to create additional structured training pathways for credit toward the airline transport pilot certificate (ATP) flight hour requirements. Identical language was also offered and withdrawn by Representative Sam Graves (R-MO) during the Transportation and Infrastructure Committee markup of H.R. 2997, the 21st Century Aviation Innovation, Reform, and Reauthorization Act.

The Airline Safety and Federal Aviation Administration Extension Act of 2010 mandated ATP certificates for all flight crewmembers and granted the FAA discretion to credit certain training toward the ATP flight hour requirements. By granting the FAA this discretion, the Act acknowledged flight time is not the only component to developing a safe and qualified pilot. The FAA determined that structured academic training integrated with flight training programs can provide more safety benefit than simply meeting the 1,500-hour flight time requirement alone. Today, through the issuance of a Restricted ATP, credit is authorized for three structured training pathways—military training, four-year aviation degree programs, and two-year aviation degree programs. The proposal recognizes that the FAA has not exhausted the potential for additional structured training pathways and asks FAA to approve more of these pathways in cases where they *enhance safety*.

This is an important objective, especially considering new data released since the rule's implementation showing the enhanced safety these structured training pathways offer compared to other qualification pathways. The FAA's final rule took effect in August 2013. Since then, new hire pilots have required *additional* training and experienced failures at *higher* rates in initial commercial airline training compared to pilots hired before the Rule's implementation. This trend was confirmed by the Pilot Source Study,<sup>1</sup> which began in 2010 as ongoing research by some of the best aeronautical universities in the country, analyzing U.S. regional airline pilots initial training performance relative to their background and flight experience. After examining the training records of more than 7,000 pilots, the Study found that "the quality of education and quality of flight training have more of an impact than total flight hours," and further found that pilots who performed *best* in initial training came from structured training pathways and had comparatively *fewer* flight hours. The proposal seeks to encourage the FAA to create more of these effective structured training pathways.

Those who favor an hours-based approach to pilot certification have cited the lack of fatal commercial passenger accidents in the U.S. since the passage of the law as evidence for requiring 1,500 hours of flight experience. However, the FAA, the NTSB, and various aviation safety experts have repeatedly stated that requiring 1,500 hours in flight has no demonstrable safety benefit. Rather, these individuals and entities suggest, today's remarkable safety record is the result of countless safety initiatives over the past two decades as well as the improved pilot training requirements, not the additional flight time requirements, associated with the Act.

Dr. Guy Smith, Professor Emeritus at Embry-Riddle Aeronautical University and a co-principal author of the Pilot Source Study, told the Senate Commerce Committee last year that the Study "showed that flight hours, as the sole source of piloting skills, was not a good indicator of performance" and "if we consider flight hours and nothing else, pilots with more than 1,500 hours did not perform any better than pilot with 1,500 or fewer flight hours."

Dr. Smith's comments align with statements from other aviation safety experts. Former NTSB Chair Deborah Hersman said: "It's not always about the hours because we see very experienced pilots with tens of thousands of hours making mistakes. In fact, in the Colgan accident, those pilots had more than 1,500 hours, but they still made mistakes."<sup>2</sup>

In a Senate Subcommittee on Aviation Operations, Safety and Security in March 2012, then Flight Safety Foundation President and CEO Bill Voss called a focus on hours in flight dangerous and said the new rule puts too much focus on hours and not enough on the training needed to avert the kinds of tragedies that prompted the rule in the first place. Voss stated: "While the purpose of a 1,500-hour rule is understood, Flight Safety Foundation strongly supports the notion that a structured training program can allow this requirement to be reduced, since that training program would reduce risk by leaving less to chance. The Foundation believes the real effectiveness of the new rule will be more a result of

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<sup>1</sup> See Pilot Source Study, <https://www.pilotsourcestudy.org/>.

<sup>2</sup> See <https://www.usatoday.com/story/news/nation/2014/02/11/colgan-air-crash-prompts-safety-regulations/5372353/>

mandating critical training that targets risk in the real world, rather than simply increasing the number of hours.”<sup>3</sup>

The viewpoint that there is a link between 1,500 hours and accident prevention has also been refuted by the FAA. Former FAA Administrator Randy Babbitt, a former airline pilot and Air Line Pilots Association President, was FAA Administrator during the Colgan accident. Administrator Babbitt testified before Congress after the accident:

“I know some people are suggesting that simply increasing the minimum number of hours required for a pilot to fly in commercial aviation is appropriate. As I have stated repeatedly, I do not believe that simply raising quantity – the total number of hours of flying time or experience – without regard to the quality and nature of that time and experience – is an appropriate method by which to improve a pilot’s proficiency in commercial operations.”

Administrator Babbitt further noted that improving specific training processes and “establishing operational experience in areas such as the multi-pilot environment, exposure to icing, high altitude operations and other areas common to commercial air carrier operations, is more targeted than merely increasing the number of total flight hours required...”<sup>4</sup>

In its FOQ Final Rule, the FAA reiterated the lack of benefit associated with the ATP requirements, noting “The FAA found no quantifiable relationship between the 1,500-hour requirement and airplane accidents” and conferring “no benefit to the ATP certificate requirement.”<sup>5</sup> The FAA further states, “Primarily because of the *training requirements* of this rule, the FAA expects that the rule will reduce the number of future accidents.” The FAA goes on to list those beneficial training requirements.

The proposal does not change or diminish the rule in any way nor alter these training requirements. In fact, it would provide *more* opportunities for pilots to obtain the very structured training benefits that the NTSB, the FAA, and various safety experts say improve safety and reduce the number of future accidents. These structured training pathways would be substantial, disciplined, rigorous, and would incorporate academic and skills training, testing, evaluation, mentoring, data-gathering, technology, and myriad other training components that have been proven to cultivate high levels of pilot proficiency and professionalism. Importantly, these structured training pathways would be reviewed by the FAA line-by-line and approved only where they can be demonstrated to enhance safety over other qualification pathways.

The creation of additional training pathways will not only improve aviation safety, but also produce more hireable pilots by maximizing the training pipeline. The U.S. is producing fewer pilots at present than are needed to serve our nation’s commercial, business, and military aviation sectors. This lack of supply of new pilots is compounded by the mandatory retirements that are beginning to take place at

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<sup>3</sup>See <https://flightsafety.org/asw-article/more-experience-required/>

<sup>4</sup> See <https://www.transportation.gov/content/update-faa%E2%80%99s-call-action-airline-safety-and-pilot-training>

<sup>5</sup> See <https://www.federalregister.gov/documents/2013/07/15/2013-16849/pilot-certification-and-qualification-requirements-for-air-carrier-operations>

the mainline airlines. By 2026, about 27,000 pilots will reach the mandatory retirement age of 65, and the University of North Dakota predicts a cumulative shortfall of pilots at major airlines alone will near 15,000 pilots by 2026. This shortfall does not include the shortages at regional airlines and already considers new pilots entering the system.

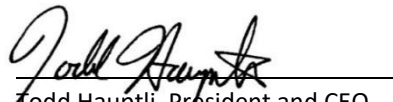
Without enough pilots to replace major airline hiring, hundreds of U.S. communities have experienced significant air service reductions, and some have lost air service entirely. These losses are occurring while demand for air travel is growing and despite a period of economic recovery in the United States, when communities would ordinarily experience higher frequencies and more service options. While service losses will affect every corner of the country, small and rural communities have been hardest hit and remain most vulnerable as the shortage worsens. According to a study by InterVISTAS for the Regional Air Service Alliance, the smallest airports (non-hub and small hub airports in the 48 contiguous states) drive well over \$121 billion in economic activity and support more than 1.1 million jobs.

We firmly believe additional structured training pathways will enhance safety by improving the overall quality of the training and education provided as part of the pilot certification process. These efforts are critical to ensuring we have a succession of properly trained and qualified pilots, capable of maintaining the safety record that has been achieved to date.


We stand ready to provide additional information and look forward to working with you to advance aviation safety.


Sincerely,

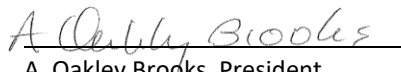
  
Faye Malarkey Black, President  
Regional Airline Association

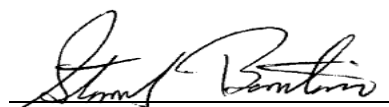
  
Todd Hauptli, President and CEO  
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