

Improving Safety by Modernizing Airline Pilot Training

The Regional Airline Association (RAA) is **NOT** seeking to reduce pilot training requirements put in place in the *Airline Safety Act of 2010*. RAA seeks to improve safety through better use of modern training technology and existing pilot training pathways.

- In 2010, Congress passed the *Airline Safety Act* (Public Law 111-216). Among other things, this law requires pilots to hold an airline transport pilot certificate (ATP) and its prerequisite 1,500-flight hours to be hired as a First Officer.
- In the *Airline Safety Act*, Congress specifically directs the FAA to allow academic training courses to be credited toward total flight hours where the Agency determines the courses will enhance safety more than requiring the pilot to fully comply with the flight hours requirement. The intent of this provision is to incentivize airlines and flight training programs to continually strengthen and modernize academic training for pilots.
 - In 2009, during consideration of the underlying bill, then Aviation Subcommittee Chairman Jerry F. Costello (D-IL) described this portion of the bill as follows: “...because pilot groups, the FAA administrator and flight education universities have all cited the need to strengthen pilot academic training, the bill allows the FAA administrator to give credit towards the 1,500-flight-hour requirements if a flight school or a university provides academic training that exceeds the strengthened minimum ATP requirements in the bill.”¹
- In 2013, the FAA implemented a new First Officer Qualifications (FOQ) Rule, requiring all airline pilots to hold an Air Transport Pilot Certificate (ATP), with a prerequisite of 1,500-flight hours, or a Restricted ATP (R-ATP), with portions of the prerequisite flight hours offset by structured training credit. The FAA initially approved three new pilot training pathways to obtain a Restricted ATP: military pilots with 750-flight hours; graduates with a BA in aviation with 1,000-flight hours; and graduates with an AA in aviation with 1,250-flight hours.
- The FAA based its decisions on the “*best currently available scientific data and information*,” and explicitly noted the need for regulatory review: “*In the future, however, FAA is likely to gather and analyze additional data in this area; for example, through safety outcomes resulting from this rule, and additional information collections associated with other rulemakings....Because of the likely availability of such data in the future, the FAA may obtain additional empirical evidence relevant to the precise relationship between flight hours and types of training. For example, Phase III of the Pilot Source Study, explained elsewhere in this preamble, suggests areas for further research.*”²
- Two updates of the Pilot Source Study used by FAA in formulating the FOQ Rule, have produced peer-reviewed, empirical data. Each study demonstrated that highly structured training-based qualification pathways are superior to hours-based qualification pathways and further showed a **marked deterioration** of pilot skill occurs while pilots build **undisciplined** flight hours between foundational training and hire.³
- To date, FAA has taken no action on these findings, and RAA and other stakeholders urge Congress to take action.
- In the 12 years since the *Airline Safety Act* was enacted there have been vast advancements in academic training courses, including flight simulation technology. Flight simulators allow instructors to build a robust curriculum and use high-fidelity simulators to train on emergencies, weather, and crew resource management in a multi-crew environment. This allows mastery of skills that are crucial for commercial flying, but are too dangerous to attempt in aircraft. Simulators additionally keep performance data to allow better evaluation of a pilot’s performance.
- Pursuant to the requirements of the *Airline Safety Act*, these additional pathways may only be approved by the FAA in instances where they enhance safety over other qualification methods. The FAA has the final say on whether any proposed programs truly improve and modernize training and safety.
- RAA is not seeking to roll back, repeal, or change the 1,500-hour rule. RAA does urge Congress to require the FAA to act promptly to ensure the continuous, data-driven advancement of pilot training and qualification. The FAA’s future actions must be based on science, data, and facts and, as required by law, FAA must take into account improvements in training programs rather than simply maintaining the status quo because it is easier.
- Lastly, the FAA must finish implementing the Pilot Records Database (PRD), also required by the *Airline Safety Act*. PRD is a crucial tool that materially improves safety thorough candidate screening. RAA was pleased that FAA began implementing the program in 2021 and urges the Agency to complete work so the PRD can be fully utilized.

¹ See: [CREC-2009-10-14-pt1-PgH11328.pdf](https://www.congress.gov/crec/2009/10/14/pt1/pgH11328/pdf) ([congress.gov](https://www.congress.gov/))

² (cite: https://www.faa.gov/regulations_policies/rulemaking/recently_published/media/2120-aj67.pdf -- p 26)

³ (cite at: <https://www.pilotsourcestudy.org>, PSS 2015 and PSS 2018)