



Airlines for America
We Connect the World

Testimony

Commercial Airline Safety Oversight

Testimony Of
Thomas L. Hendricks
Senior Vice President
For Safety, Security And Operations
Airlines For America
Before the
U.S. Senate Committee On Commerce, Science, And Transportation
Subcommittee On Aviation Operations, Safety, And Security

March 20, 2012

Chairman Cantwell, Ranking Member Thune and Members of the Subcommittee, thank you for inviting us to appear at this timely and important hearing.

Safety underpins every aspect of airline operations. The remarkable safety record of the airlines that are members of A4A demonstrates their unflagging commitment to fulfilling that responsibility. As a former airline captain, I have repeatedly witnessed that commitment. The results are extraordinary: no mainline U.S. airline has had a fatal passenger accident in over a decade.

That achievement, however, does not mean that we are satisfied. Airline employees and management teams continuously work to improve safety. We very much appreciate the Subcommittee's emphasis on safety, as well as the efforts of the Federal Aviation Administration and the National Transportation Safety Board. The recently enacted FAA Modernization and Reform Act includes a wide range of initiatives that will further enhance aviation safety, including expediting the deployment of ASDE-X radar at major airports, promoting the sharing of safety data by airlines and airline employees with the FAA, and establishing a risk-based inspection system for aircraft repair stations located overseas. But the fact is that, day in and day out, our members and their workforces exceed what laws and regulations require.

Government's role in airline safety is crucial but it is also important to recognize that how we "do safety" has changed dramatically over the years. The airline industry has reached the point where many of the improvements in safety are attributable to robust data-driven analysis programs. They often involve the collaborative scrutiny of the FAA, employees and management. And many of the most effective programs are the result of voluntary employee reporting mechanisms.

These data-based programs enable us to identify emerging patterns and promptly deploy focused resources to reduce risks prior to crossing the threshold where safety could be compromised. This approach – going where the data take us – has greatly improved the quality of safety programs.

With respect to recent safety initiatives, including those that Public Law 111-216 directed, we want to compliment the FAA on its professionalism in conducting a number of demanding rulemaking proceedings in a very short time.

One of these proceedings is the proposed pilot qualification rule. In accordance with Public 111-216, the FAA issued a proposal on February 29th that first officers hold an Airline Transport Pilot



Airlines for America
We Connect the World

Testimony

certificate and a minimum of 1500 hours flight time to obtain the certificate. Existing FAA regulations do not require a first officer flying for a Part 121 air carrier to hold an ATP certificate; only the pilot in command must meet this certificate requirement. The proposed rule allows for lesser flight-experience thresholds for aviation college graduates and former military pilots.

A4A is preparing comments for the rulemaking proceeding. Although we have not completed them yet, we are concerned about the issue of quantity versus quality. Hard-hour minima are not a substitute for the quality of a pilot's training and experience. Moreover, we need to avoid the unintended consequence of this rule becoming a significant barrier to recruiting airline pilots.

Public Law 111-216 also contained training requirements that we supported because they were targeted initiatives. In response to that legislation, the FAA created several Aviation Rulemaking Committees. Last May, it issued a supplemental notice of proposed rulemaking concerning Subparts N and O, the FAA's training regulations.

This is a complex matter. In simplest terms, we recommend that the FAA:

- Withdraw the SNPRM and convene an Aviation Rulemaking Committee to develop revisions to Subparts N and O that are data-driven and respond to specific concerns. The SNPRM's proposals, in contrast, would have a negligible effect on airline safety but would impose significant costs on carriers and would divert resources from some of the most sophisticated training programs in the world. That outcome is not justifiable.
- Reconsider its decision not to mandate the Advanced Qualification Program as the single means of conducting air carrier training. AQP entails a systematic front-end analysis of training requirements from which explicit proficiency objectives for all facets of pilot training are developed. That, we believe, is how all Part 121 carriers should conduct their training.
- Require training for upset prevention and recovery, and adverse weather operations. This should be done by adopting the recommendations of Public Law 111-216 and the Flight Crewmember Training ARC.

The FAA's flight time limitations and rest requirements rulemaking proceeding was a complicated undertaking. Overall, we believe the outcome was good. The FAA gave careful consideration to the comments it received and the final rule reflected that. Our biggest disappointment was that the rule imposed a hard flight-time limit of eight or nine hours, depending on the time of the day. It is important to note that no other nation imposes limits to flying time on commercial aviation. Rather, they correctly provide limits on total flight duty periods, which also encompasses non-flying activities. Also, the current rule allows for that limit to be extended for circumstances beyond the carrier's control. That narrow allowance does not compromise safety and recognizes the vagaries of airline operations.

As my remarks this afternoon indicate, the airline industry is committed to data-driven evaluations of operational issues. That kind of analysis produces the most responsive and effective results. And it allows for the most efficient deployment of finite resources in making necessary changes. As my remarks also indicate, we believe that regulations should also demonstrate that commitment.



Airlines for America
We Connect the World

Testimony

We appreciate very much the Subcommittee's leadership in aviation safety. We look forward to working with you to achieve further improvements in safety.