

SE 28 and 29

Loss of Control (LOC)
Joint Safety Implementation Team

**Implementation Plan
for
Policies and Procedures – Policies**

Statement of Work:

The purpose of this project is to ensure that essential safety information and operational procedures generated by airplane manufacturers are included in companies' operating manuals, training programs for pilots and other appropriate employee groups, in daily operations. Operators should also develop a means to improve the performance of those flightcrew members that meet the minimum criteria, but have shown a limited proficiency.

Lead Organization for Overall Project Coordination (LOOPC):

ATA

Safety Enhancement 28:

Aviation safety will be advanced by improving flightcrew and other operator employees' performance through timely identification and dissemination of essential safety information and procedures.

Score: 2007-(7.3) 2020-(7.3) 100%-(7.3)

Resource Requirements:

- Approximately one man-year per organization
- \$250,000

Completion Date: 1 year

Output 1:

Reliable processes should be developed to ensure flight operations and maintenance personnel are made aware of and incorporate essential operating information in a timely manner.

Resources: AIA (LOOC), ATA, RAA, ALPA, APA, manufacturers, etc. The resources required for this output will be limited to the man hours of each organization involved in the identifying and distribution of the essential operating information. Since most of this identification would be integrated into the normal information review process once established, the initial cost estimates would be one additional man-year per organization and \$250,000, which would be shared by the operators, manufacturers, and labor organizations. These costs should also cover the review of present documents.

Timeline: 1 year

Actions:

1. Manufacturers should review their processes for distributing essential operating information and to identify its significance.
2. Operators should distribute essential operating information identified by the manufacturers to flight crews and maintenance staff in an appropriate and timely manner.
3. Directors of Safety, or equivalent, should ensure the establishment of a process to identify, review, analyze and include essential operating information in training programs and in manuals used by flight crews and maintenance staff.
4. Operators should revise the company flight manual(s) in a timely manner as essential operating information is amended or added.
5. Principal Operations Inspector's should perform follow-up surveillance, within their normal work program, of completion of actions 1-4 IAW with HBAT 99-07 and HBAT 99-16a.

Safety Enhancement 29:

Aviation safety will be improved by ensuring carriers have a process to enhance pilot proficiency.

Score: 2007-(3.8) 2020-(3.8) 100%-(4.7)

Resource Requirements:

- Approximately two-man years to develop.
- Additional training costs of \$5 million per year.

Completion Date: 1 year

Output 2:

Operators, in collaboration with pilot associations, should ensure their training and qualification processes utilize information from programs such as FOQA, AQP, and ASAP to assist in assuring pilot proficiency.

Resources: ALPA (LOOC), ATA, APA, RAA, etc. The resources required for this output are:

1. Organizational time of approximately two-man years to develop this process.
2. Additional training/checking would be estimated to cost \$10,000 per individual identified by the process. With an estimated ½ percent on the approximately 100,000 air carrier pilots affected, this would compute to a total training cost of \$5 million per year.

Timeline: 1 Year for program development.

Actions:

- All pilot associations and operators should review existing programs and collaborate to develop a mechanism to continuously improve pilot performance and proficiency.

- Improved overall flight crew performance and proficiency should be paramount in program design.
- The program should be a joint effort among pilot associations and operators, with safeguards designed to protect confidentiality of individuals and information.
- The program shall be non-punitive, voluntary, and managed by the individual airlines. Entry into the program can either be by voluntary self-disclosure or through encouragement by the pilot associations Professional Standards or Standardization and Training Committees.

Relationship to Current Aviation Community Initiatives:

When the Air Transportation Oversight System (ATOS) was implemented in 1997, the FAA initiated the oversight of several major operators with a system-based safety approach. The program included safety attribute processes to assist in sustaining effective flightcrew operating manuals. When HBAT 99-07 and HBAT 99-16a were released in December 2000, some Part 121 operators were already voluntarily correlating the flightcrew operating manuals to the contents of the manufacturer's airplane flight manual (AFM). Output 4 of the Approach and Landing Accident Reduction (ALAR) report established an AFM database supported by the manufacturers and administered by the FAA in AFS-600. This process would consolidate AFM revisions, information, and Operator Bulletins into one WEB based/available information source.

FAA rulemaking is currently in progress to modify subparts N and O of 14 CFR Part 121. These changes may require each Part 121 operators to model their flightcrew operating manual and related training and qualification program, on the approved AFM. This new rule would permit certain changes and additions to the AFM, but no omissions. The FAA is considering additional rulemaking that would establish a single source crew operating manual(s) as a required repository for all essential operating procedures generated by the manufacturer. This manual would be subject to FAA approval, and would be supported by an effective revision system. This manual(s) would be required as the core document for any operating manual developed by a Part 121 operator for use by its flightcrews, and would be the primary document of the approved flightcrew qualification program.

The current Part 121 training rules and AQP programs require pilots to be trained to proficiency and then evaluated with standardized checkride profiles. Many airlines and pilot associations have mechanisms in place that address pilot performance and proficiency issues, such as pilot training committees and review boards. Since 1995, 14 CFR Part 121.434 and 121.438 address the proficiency of newly qualified pilots and specify the consolidation of knowledge and skills, high landing minimums for new captains, and crew pairings considerations. The Pilot Records Improvement Act of 1996 requires background checks to minimize the likelihood of an air carrier hiring a pilot with a documented history of poor performance.

Performance Goals & Indicators for Safety Enhancements/Outputs:

Safety Enhancement 28:

- Goal: Improve flightcrew and other operator employee's performance through timely dissemination of essential safety information and procedures.

Indicator: No Part 121 accidents related to lack of available essential safety information.

Output 1:

- Goal: Develop processes to ensure safety essential information is identified and distributed to operations and maintenance personnel in a timely manner.

Indicator: No LOC accidents related to lack of essential information.

Safety Enhancement 29:

- Goal: Develop a more effective pilot qualification and proficiency program.

Indicator: Decrease in Part 121 accidents related to pilot proficiency and competency.

Output 2

- Goal: Develop a process to enhance pilot proficiency and competency.

Indicator: Decrease in LOC accidents related to lack of pilot proficiency and competency.

Programmatic Approach:

Organizational Strategy

The LOC JSIT has identified ATA as the LOOPC organization. The LOOC's are identified in each output of this implementation plan. The roles and responsibilities of the LOOPC and LOOC are described in the CAST approved JSIT Process Document. The LOOPC will provide the project lead for the Policies and Procedures project and should work with AIA, ATA, RAA, labor unions, the FAA, manufacturers, and others to develop processes and systems identified in the outputs. The project lead should coordinate the activities outlined in the implementation plan, and should provide progress reports, when requested, to the CAST. Implementation of this product is a shared responsibility between the FAA, air carriers, manufacturers and labor unions, as appropriate.

The success of both outputs depends largely upon the safety posture of the industry. The essential safety flightcrew information identified in Output 1 must be incorporated into existing operator manuals. This process would ensure this information is properly marked and disseminated to the flightcrews and other personnel in a timely and efficient manner. Output 2 addresses the improvement of aviation safety by developing a process to enhance pilot proficiency and competency. This process will need to be designed and accepted by both the Part 121 operators and flightcrew labor unions in order to be implemented. The privacy of the individuals involved in this program needs to be safeguarded.

Implementation Activities

Output 1: Until the current FAA rulemaking changes becomes fully implemented in 2007, manufacturers and Part 121 operators must voluntarily support and adhere to the safety intent of HBAT's 99-07 and 99-16a. The FAA should also support certain culture changes, funding, and staffing issues in the ACO's and AEG's to build and maintain the AFM database in AFS-600. Manufacturers and the FAA should cooperate to fully populate this database with appropriate records

relating to AFM revisions and operational bulletins. The FAA should fully fund and staff this database process to ensure its currency and usefulness to inspectors, in accordance with HBAT 99-16a.

Output 2: The support of the industry operators and pilot associations to recognize and design a program to address the flightcrew member proficiency and competency is crucial to this project's success. There shall also be a means to protect the operator and individual privacy associated with this program.

Key Products and Milestones:

The following milestones are based on the date of CAST "G" approval:

- Develop processes to disseminate essential safety information
AIA G + 12 months
- Develop pilot enhancement system
ALPA G + 12 months

Risk Description:

Output 1 is considered Low Risk. All operators, manufacturers, and the FAA support enhancing the identification and dissemination of safety information and operational procedures to flightcrew and other personnel. Operators are also already familiar with HBAT 99-07 and 99-16a that references correlating flightcrew operating manuals with the manufacturers' AFM. This output will enhance these previous programs.

Output 2 is considered Moderate Risk. Many of the labor unions have expressed concern over the identification of different levels of pilot proficiency and competency. The issue of FOIA, litigation, and privacy protection of the information and data generated from this program is a very important concern. Also of concern is the philosophical objection to separating the pilots into "good or other" classifications. There is also concern over the increased cost of training for pilots identified in this classification and the administering of a separate listing for training and crew pairing.

Risk Mitigation Plan:

Output 1 has no apparent risk and should be supported by all organizations. The cost to design, implement, and sustain this program should be kept to a minimum to encourage its quick implementation.

Output 2 should be a joint program between among labor unions, and operators, with safeguards designed into the program. The positive intent to improve overall flightcrew performance should be paramount in the program design. The program should be designed as non-punitive, voluntary, and managed by the labor unions on an individual airline basis.

Impact on Non-FAR Part 121 or International Applications:

All operators can benefit from having the essential safety information and operational procedures identified by the manufacturers. This would encourage the non-FAR Part 121 operator to easily modify their operating manuals and training programs. Since these operators usually design their

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own programs patterned after the manufacturer's guidelines, they will therefore benefit from this information. The foreign operators can also benefit for this information in the same manner and should be a part of the design and implementation processes.

The process described in output 2 would be voluntary and would have minimal impact on the non-Part 121 or international air carriers.