

Testimony of
Roger Cohen, President, Regional Airline Association
Before the Subcommittee on Aviation, Committee on Transportation and Infrastructure
House of Representatives
Hearing on
The Federal Aviation Administration's Call to Action on Airline Safety and Pilot Training
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Good morning Chairman Costello and Members of the Subcommittee. My name is Roger Cohen. I am the President of the Regional Airline Association and I want to thank you for the opportunity to appear before you today. Regional airlines play a vital role in our nation's air transportation system. More than 50 percent of all commercial flights are flown by regional airlines, and 75 percent of our nation's communities are served exclusively by one of our RAA member carriers.

Mr. Chairman, for the purpose of aiding the Subcommittee's inquiry, our testimony will provide an update on three broad areas:

- our members' significant strides in adopting major safety programs, including our commitment to FOQA (Flight Operations Quality Assurance) and ASAP (Aviation Safety Action Program).
- our role in the flight and duty time ARC meetings held by the FAA this summer; and
- RAA's Strategic Safety Initiative, embarked on earlier this summer to address the issues of greatest concern to regional airlines including pilot fatigue, training and commuting.

We share the Subcommittee's commitment to safety and we want to reaffirm our belief that safety is a shared effort. It is through cooperation by all participants in the system – regional airlines, network airlines, our valued employees, industry suppliers, and the FAA – that we can continue to make our nation's air transportation system even safer than it already is. All of the hearings and meetings leading up to today's hearing – conducted by this Subcommittee, aviation safety agencies, and the Regional Airline Association – have served to focus our attention on the critical challenge we continually face: to identify safety risks and to prevent any future accidents.

As a result of these efforts and the searing focus we place upon safety, I am proud to announce at the outset of this hearing that virtually all of our RAA's members either have established or have committed to a Flight Operations Quality Assurance (FOQA) safety program. These airlines transport 98% of the passengers carried by RAA members, and these FOQA programs are expected to be in place within the year. The same goes for ASAP. Virtually all of our members have adopted the Aviation Safety Action Program (ASAP) for their pilots today, and virtually all of them have had ASAP in place for many years. This is indeed an encouraging finding, a demonstration of our commitment to excellence and a tribute to the open lines of communication this subcommittee has maintained with the industry all in the interest of furthering our mutual goal of accident prevention.

THE REGIONAL AIRLINE INDUSTRY

Regional airlines are a key component of the nation's commercial air transportation system. Our members operate regional jets and turboprop aircraft ranging in size from about 10 to 100 seats, providing scheduled passenger service connecting more than 600 smaller towns and mid-size cities to each other as well as to the nation's major hub airports. This network provided 160 million passengers with seamless service to almost every community in the country and many around the globe last year. Over the last 20 years, the industry has worked to match aircraft size to the market, leading to vast improvements in customer convenience, reliability and affordability to many communities that would otherwise not have air service.

For the most part, regional airlines operate in full partnership with major airlines. Major airlines either contract with regional airlines to provide service on selected routes or have an ownership stake in regional airlines. Regional airlines are responsible for providing the crew and maintaining the aircraft. The major airline, for which the regional carrier is providing service, sets flight schedules, fares and customer service standards.

Whether it is a regional or a major carrier, passenger and crew safety is and will always be paramount in this relationship.

THE SUBCOMMITTEE'S ASAP and FOQA INQUIRY

Earlier this summer, the subcommittee asked our member airlines to identify their level of participation in various safety programs such as ASAP and FOQA. The results of that inquiry are impressive; virtually all of our members either have or have committed to a FOQA program, with most programs in place or in the final stages of approval within the next year. These airlines transported 98% of the passengers carried by RAA members last year. With respect to ASAP the results are similar; virtually all of our members had implemented an ASAP program for their pilots up to a decade prior to the subcommittee's inquiry. Our commitment to the value of this safety program is demonstrated by the fact that more than twice as many RAA members have ASAP programs for their flight attendants as do mainline carriers.

CALL TO ACTION MEETINGS

After the Congressional hearings in June, the FAA hosted a Call to Action meeting to discuss the launch of its multi-organization initiative. Seven RAA member airlines were invited to attend this meeting and, on short notice, the COOs and senior executives – including the Chief Executive Officers of six companies -- participated in the meeting. I too was fortunate enough to participate in this meeting, which was similar to other meetings demonstrating the commitment to safety that has been the hallmark of the regional airline industry.

During this meeting we worked closely with the major airlines, the FAA and labor organizations to discuss openly and candidly the safety issues most affecting our industry and to set the near term safety agenda. One conclusion reached at the meeting was for FAA to host a dozen similar town hall meetings across the country to share and to expand these safety discussions with

stakeholders on a broader scale. The RAA member companies were pleased and honored to co-lead each and every one of those twelve meetings.

FLIGHT, DUTY & REST AVIATION RULEMAKING COMMITTEE

RAA appreciated the opportunity to participate recently on the FAA's Advisory Rulemaking Committee (ARC) on safety rules and guidance for pilot flight, duty and rest requirements. During the nine weeks of meetings, RAA was represented by the chief operating officers from two of our member airlines, and our vice president for operations and safety, who is an ATP with more than 10,000 flight hours. While the rulemaking process is just beginning, we are hopeful, but confident the new rule will be based both on the best available fatigue science and on the industry's extensive experience.

Let me state unequivocally, the members of the Regional Airline Association are committed to participating fully in the rulemaking process and to adopting the new science-based regulation that arises from this process and to do so in a prompt and timely manner.

STRATEGIC SAFETY INITIATIVE

In addition to being active participants in the FAA's efforts this summer, the Regional Airline Association has embarked on its own Strategic Safety Initiative that similarly aligns with the FAA's efforts. The RAA's Strategic Safety Initiative is a focused effort to identify industry best safety practices and trends, to accelerate the process of reviewing NTSB recommendations, and to provide the latest fatigue science and countermeasures.

1. Review Safety Procedures

The Regional Airline Association has formed a task force comprised of safety directors and operations directors from the regional airlines to review safety procedures, paying particular attention to any issue or procedure cited by the NTSB as a contributing factor in any accident. This standing RAA committee will hold its initial meeting in November and we anticipate keeping this subcommittee and the FAA apprised of our activities.

2. Study Fatigue Risk

In collaboration with Washington State University's Sleep and Performance Research Center, we will be assessing the level of fatigue risk associated with typical regional airline pilot schedules. The mechanics of the study are still being developed; however let me note that the assessment will include field testing, identification of unique fatigue factors affecting regional airline pilot performance and alertness, and identification of countermeasures to mitigate the adverse effects of these factors. Although there has been significant fatigue research, most of that work has focused on long haul routes. We anticipate building on the existing research that is applicable to the regional airline flight environment.

Additionally, although Fatigue Risk Management Programs (FRMS) are new to the industry, we have also launched a study to determine the feasibility and practicality of developing an industry FRMS for the regional airlines. Conceivably, this effort could make cutting edge fatigue risk assessments available to even the smallest airlines by pooling the resources across many airlines, small and large.

3. Fatigue Awareness Management Program

This component of our Strategic Safety Initiative will also be conducted in collaboration with the Flight Safety Foundation. Our objective will be to study accident information and the best practices for fatigue management, both inside and outside of the US airline industry. From this we will develop an industry leading program that will be available not only to RAA's members, but also any other airline with similar operations.

As we have previously testified, airlines provide training to pilots to enable them to recognize the signs of fatigue. We aim to build on the best practices of those programs.

RAA's members have and will continue to take a leadership role in using what we have and will continue to learn about fatigue and alertness and to embody them in our training programs and in our culture. Let me note, once again, that this is a shared responsibility. It is the professional responsibility of every professional pilot, if he or she does not feel sufficiently well rested, to say so and not fly. Each of our member carriers has a non-punitive policy in place to allow a pilot to drop a trip if the pilot feels incapable of flying alertly. Backup flight crews are in place specifically for this purpose. Pilots must maintain this professional responsibility and ethical obligation to passengers and their fellow crewmembers to conduct themselves in a manner that ensures they are well rested.

Oftentimes the fatigue issue is tied to pilot commuting. Some pilots choose to commute and live away from their crew base, which typically is the airport from which they will begin and end every flight assignment. Commuting is a common and long-standing practice among crewmembers at all airlines. It is one of the attractions of the profession. While many pilots commute, many others do not. Commuting is a life style choice; not a necessity dictated by economics. Regional airlines have crew bases in dozens of attractive communities throughout the country; communities in which other airline employees making comparable salaries reside and thrive.

Commuting is a choice. A pilot may choose to reside on the East or West Coast, drive a few hours from his or her home to an airport and, at no or little cost, board a multi time zone flight to arrive at his or her crew base several hours later. That's a perk of being a pilot. However, with perks come responsibility, and those who choose long commutes have a professional responsibility – to their fellow crewmembers and to our customers – to arrive at work properly rested.

4. Recommendations to Congress

In addition to the three specific measures our Strategic Safety Initiative will undertake under the auspices of the RAA, as part of our Initiative we are committed to working with Congress to provide the aviation industry with additional safety tools, that require legislative or regulatory action including:

- a. Establishing a single database of pilot records to be maintained by the FAA to enable airlines to access critical, real-time information about pilot checkrides, thereby improving the process of recruiting, hiring, and training new pilots. While our members try to utilize this information today, it takes weeks if not months to access.
- b. Conducting random fatigue tests on pilots to help ensure that pilots are indeed rested before flying.
- c. Extending the background check timeframe to the last 10 years of a pilot's flying record. Under current law, an airline conducting a background check on a pilot can only review the last five years of the pilot's safety records, qualifications, and training.
- d. Using cockpit voice recordings for accident prevention as opposed to their only current utilization as an accident investigation tool. RAA clearly understands the sensitive privacy issues involved with access to the CVRs. Similar to ASAP and other diagnostic preventative safety programs, an initiative permitting random, non-punitive audits could provide valuable information. The alternative is to maintain the tombstone mentality that surrounds CVRs.
- e. Improving check ride tracking and analysis to ensure all pilots are up to par. Every airline pilot is required to pass frequent check rides during his or her airline service, and pilots cannot fly until they have successfully completed their required check rides. We believe FAA and the airlines may be able to increase the level of safety through a more detailed analysis of check rides over the entirety of a pilot's career.

Our multi-part Strategic Safety Initiative will look at human factors that have led to accidents in order to avoid incidents in the future and push for new advances in aviation safety. It is an ongoing effort and we will continue to keep you updated on our progress and share our findings with both this Subcommittee.

CONCLUSION

Mr. Chairman and Subcommittee members, the Regional Airline Association appreciates the opportunity to testify before the Subcommittee this morning and I welcome any questions you might have.