



The Coalition of Airline Pilots Associations

TESTIMONY OF
JEFFREY SKILES, VICE PRESIDENT
COALITION OF AIRLINE PILOTS ASSOCIATIONS

BEFORE THE
SUBCOMMITTEE ON AVIATION
COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE
UNITED STATES HOUSE OF REPRESENTATIVES
WASHINGTON, DC

September 23, 2009

THE FEDERAL AVIATION ADMINISTRATION'S
"CALL TO ACTION ON AIRLINE SAFETY AND PILOT TRAINING"

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"CALL TO ACTION ON AIRLINE SAFETY AND PILOT TRAINING"**

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I would like to thank Chairman Costello, ranking member Petri, and the members of the House Aviation Subcommittee for accepting my testimony here today. I am Jeffrey Skiles, Vice President of the Coalition of Airline Pilots Association (CAPA). CAPA is a trade association representing over 28,000 professional pilots at carriers including USAirways, American Airlines, UPS, Southwest Airlines, NetJets, ABXAir, Atlas Air Worldwide, Polar Air Cargo, and Kallitta Air.

First, let me acknowledge the tremendous loss suffered by the families of the Continental Connection Flight 3407 disaster. I cannot begin to imagine the pain and loss suffered by the victims' families and I know my fellow pilots will keep them in their thoughts.

It is good to reflect on the reasons why we are all here today. On February 12th of this year, Continental Connection Flight 3407 crashed into a Buffalo, New York neighborhood causing the terrible loss of all onboard and one unsuspecting resident on the ground. In the aftermath the spotlight has been on fatigue issues, pilot experience, and industry compensation levels.

The Continental Connection accident was the deadliest transportation accident in the United States in more than 7 years and was a needless tragedy. Although the NTSB has not issued an official probable cause, as of this date, the NTSB facts and aircraft animation of the Continental Connection flight reviewed by professional airline pilots seem to implicate that the two pilots placed themselves in an untenable flight regime from which they were unable to recover. Their actions demonstrated that they both possessed neither the experience nor the skill necessary to prevent the tragedy.

While the actions of these two pilots during the performance of their normal duty led to this tragedy, they were as much victims of the state of the nation's airline pilot industry demographics as the passengers who entrusted their lives to Continental Airlines. They were simply asked to fly a complex aircraft in challenging conditions that their limited experience level had not prepared them for.

FATIGUE

Fatigue issues have long been a contributing factor in aviation accidents. The NTSB has recommended modifying flight/duty time rules for many years. Numerous studies have been commissioned and recommendations have been made for change. And yet no action has come to combat this issue.

Administrator Babbitt called for an Aviation Rulemaking Committee to discuss changes in current regulations. While the FAA will be the final arbiter and Administrator Babbitt has promised changes in regulation, the current discussion is trending towards increasing the number of hours a pilot can fly in a duty period. There are no studies that conclude that increasing total flight time is safe. But, there is plenty of scientific evidence to show that “time on task” and “workload” contribute to fatigue.

Industry took the opportunity of a nation that is demanding that pilot fatigue issues be fixed, to attempt to rewrite the rules in favor of increasing productivity and thereby putting pilots at a higher risk of fatigue. Congress needs to provide direction and oversight on the regulations that will come out of the FAA ARC process to ensure the safety of our nation’s passengers is not compromised.

AIRLINE TRANSPORT PILOT’S LICENSE (ATP)

Over the past several years, there has been a dramatic drop in the experience levels of new hire pilots in our nation’s cockpits as airlines sacrifice experience for the bottom line. Under questioning from the NTSB, Colgan’s Vice President for Administration, Mary Finnigan, reported that the First Officer on flight 3407 drew an annual salary of \$16,200. In an effort to attract pilots at these poverty level wages, minimum hiring qualifications have dropped to the lowest bar possible. Many of our nation’s experienced pilots are now unwilling to work in the industry for such wages, and regional airlines need to fill their pilot seats with lesser qualified pilots.

The Airline Safety and Pilot Training Improvement Act of 2009 (HR 3371) calls for all Airline Transport pilots to possess an Airline Transport Pilot’s license (ATP). The ATP would increase the experience base of US commercial pilots as it would require flight experience commensurate with the position. The FAA ATP certificate requires:

- 1500 hours of flight time;
- 500 hours cross country;
- 400 hours of night time; and
- 75 hours Instrument time (50 hours in instrument conditions [in the clouds]).

In the cockpits of our major airlines, the de facto qualifications of all pilots on the flight deck are an Airline Transport Pilot’s license and many, many thousands of hours of experience. Today every major airline has, at a minimum, a 1500 hour experience requirement before they will even accept an application. But these stellar qualifications are not guaranteed to all passengers in our

air transportation system. Over 50% of US domestic flights are now operated by regional air carriers, representing a major shift on how airline transportation companies operate. Yet these pilots operate in the same congested airspace as major airline pilots. And there regional aircraft are just as complex and sophisticated.

EXPERIENCE

Many careers have experience level requirements before attaining full recognition. Architects must complete demanding educational requirements consisting of art and engineering, yet even after completion of formal training, they are required to serve a 3 year apprenticeship before attaining full licensure. Engineers must have 4 years of work experience before being allowed to sit for the Professional Engineers exam. The vast responsibilities placed on the shoulders of airline pilots and the expectation of safe, professional travel by our nations public require no less from airline pilots.

JUDGEMENT

FAA Administrator Babbitt also expressed the desire for a better educated, better trained aviator who can exhibit better judgment. Judgment is largely developed from applied experience. While a prospective pilot is acquiring his Airline Transport Pilot experience, he is exposed to “other than normal” events which provide experience that guides judgment for a mature pilot. The opportunity to develop judgment thru real-world experience is part of the development of critical decision making skills. As Captain Chesley Sullenberger so wisely stated, “I made deposits to my ‘Safety Bank’ for 30 plus years, and on January 15, 2009, I made one big withdrawal.” The passengers of US Airways Flight 1549 had a combination of 70 plus years of experience working for them in the cockpit.

AIRMANSHIP

Airmanship skills are not only taught through good training, they are developed and honed over time. Flying aircraft of any size develops airmanship skills. Learning the systems and procedures for transition into sophisticated aircraft is confidently made when there is a well established foundation of flying skills. This concept of progression is well-defined in the FAA approved Advanced Qualification Programs (AQP Training Programs) used throughout the major airlines.

SPECIAL INTEREST GROUPS

Aviation flight schools wish to maintain their current ability to place graduates directly into airline cockpits after graduation with no opportunity for experience or skill development. Aviation school accreditation boards share the same focus. One argument heard quite often is that we have a pilot shortage. There is not now a shortage of qualified pilots, they just aren't flying airliners. They are now flying for corporate flight departments or fractional ownership companies, they are flying cargo or charter, or they have left the industry altogether for other pursuits as they seek a living wage for themselves and their families. Airline flying is not a desirable career for experienced professional pilots.

Up until a few years ago, the new hire pilot requirement at the regional airline Air Wisconsin was 2,500 hours including 1,000 turbine engine experience; even with these requirements flight

schools managed quite well. Today, Air Wisconsin's minimum experience requirement is only 500 hours. When HR 3371 becomes law, new hire requirements will be as they were previously; at acceptable levels. If the industry no longer is willing to provide the safety net required, Congress needs to act to do so.

Many of today's aviators graduated from college aviation programs. They received their training in these college environments and then went out to gain experience in other aviation endeavors before having the necessary qualifications and skills to be considered for airline employment. Their careers were enhanced by this apprenticeship.

There is no excuse for another Buffalo accident. The authors of the Airline Safety and Pilot Training Improvement Act of 2009 (HR 3371) recognize that fact and have acted upon it.

Today we find ourselves 7 month distant from the events that triggered these discussions. While Administrator Babbitt has shown a willingness to attack these problems and come to inclusive solutions, we frankly are no closer to necessary change than we were at the start of this journey.

I am here today as a representative of our nations dedicated, professional pilots. We as a group can speak to the need for change. Representatives of all the pilot's associations, ALPA, CAPA and the IBT came before this subcommittee in July as a united front in support of the Airline Transport Pilot's license as the minimum standard in the cockpits of our nation's airliners. At CAPA, we unreservedly support HR 3371.

Administrator Babbitt was instrumental in improving safety 20 years ago when he advocated requiring all scheduled transport be conducted under Federal Air Regulations (FAR) Part 121. He did this to create in his words, "One Level of Safety." We ask him to continue advocating for safety by supporting the Airline Transport Pilot's license as the minimum standard for all pilots in Airline Transport aircraft. We further ask Administrator Babbitt to support all the initiatives of HR 3371.

Chairman Costello, ranking member Petri, and members of the House Aviation Subcommittee, thank you again for accepting my testimony here today. I am happy to respond to any questions which the subcommittee may have.

Respectfully submitted,

Jeffrey Skiles
Coalition of Airline Pilots Associations