

Part 61 considerations:

The changes to current training and licencing practices in Part 61 are significant for our two companies, and have been given much analysis and consideration by our management and operational personnel.

We seek to open a dialogue with CASA to discuss these changes as they apply to us, and explore the possibilities of some modifications in their application to our operations.

The companies and people involved are:

Shortstop Jet Charter Pty. Ltd.

Mike Falls sr, Managing Director/Chief Pilot.

Brenton Skinn, Operations Manager, Captain.

Jet City Pty. Ltd.

Lorne Cole, Managing Director.

Additionally, Mr John Orłowski, an independent consultant to the industry in regulatory compliance matters is advising us in this submission.

John has been retained by Shortstop for many years in association with various operations manuals production and approvals.

Preamble:

Shortstop and Jet City have operated various turbine and piston engine aircraft from Essendon for more than fifty years in combination, and hold all required approvals for training and checking on the aircraft types operated.

We both have operated on the basis of inducting excellent young people at an early stage of their flying careers, and trained them in our respective business disciplines in conjunction with their advancement as pilots.

This has resulted in successive generations of outstandingly competent individuals, capable of fulfilling the particular demands of our segment of the industry to very high standards.

They typically take about seven years to attain aircraft commander status.

The process involving aircraft knowledge and handling proficiency to command is to some degree secondary to them becoming experienced and competent in the specifics of our operations, which are very wide ranging and demanding in comparison to most RPT situations.

By the time they're ready to be Captains, they've spent years operating under the supervision of their superiors to all the various ports we visit, and have been involved in the diverse nature of our operations. (Corporate, ad hoc charter, medevac, airwork et al...)

Any pilot coming into our operations, regardless of aircraft qualifications or experience in other fields of aviation, takes a similar time to become safe and capable.

We've found on the occasional entry of experienced people that it's more difficult for them to come to terms with the particular demands of our operations than the ones that start with us from scratch.

Our experience with this policy of training young people from the earliest stage of their careers over the past 25 years plus has been overwhelmingly positive, with many of them moving on from us to successful positions in the military and RPT.

We believe that the philosophical approach of Part 61 is in part counterproductive to delivering improved safety outcomes for the corporate aviation sector.

We recognise that '61 is in tune with the philosophical approach to training of the MPL, and fully accept that it is relevant and appropriate for the RPT sector.

For us, we believe that the implementation of the proposed changes as currently listed will limit our opportunities for strong mentoring of young pilots, and will be detrimental overall to our safety culture.

Whilst we do not submit that just because something has existed for a long time it should not be subject to review and change if deemed necessary, equally we believe that something that is working well should be modified for the reason of some desire for commonality for its own sake.

The single type rating requirement inherent in Part 61 makes it impossible in practical terms for an entry level pilot in the majority of GA applications to be considered for employment as has been the case up to now.

There's been a two-step approach to crew training for many decades, (The co-pilot endorsement, and the co-pilot instrument rating.) and for good reason, we believe.

Co-pilots receive the same technical training as Captains, and are subject to the same additional training requirements mandated from time to time, but their flight/instrument training requirements are less, reflecting their ability to absorb and attain an acceptably safe and practical standard at their entry experience levels.

They experience and learnt the broader aspects of aviation whilst gaining proficiency in the aircraft in normal operations, and when the time comes for them to adequately and safely handle the mental and philosophical demands of command, the additional aircraft handling training is readily and safely accomplished.

This is what we've been doing, safely and to an excellent standard, and most importantly under our direct and ongoing supervision and assessment.

We believe that the concept of the MPL, that of training a cadet from scratch in the airline system, culminating in a transport category aircraft type rating, is an excellent one for airline applications, but not one that our sector can or should accept, given the diverse nature of our operations.

To take a typical entry level person to GA transport category operations, and require that they attain command proficiency levels before commencing employment, is just not a safe or practical proposition in our view.

The flow of training for us is as that the entrant is initially employed on ground duties for a period whilst an assessment is made (from both sides) as to whether or not we should proceed.

The ground duties include all the work involved other than flight crew responsibilities. (Ground handling, planning, cleaning, and administrative and maintenance interactions et al.)

The entrant also travels on operations where practical and possible as an observer, which we've found extremely helpful in preparing people for flight crew induction and training.

By the time type rating training is agreed and commenced, the trainee is very well prepared, and can accept it with a great degree of understanding and insight.

Once rated, he or she can then commence line operations with confidence.

Typically they accumulate 500-700 hours in about four years; we then complete their command training, and they then act ICUS until they attain an ATPL.

They are then ready in all respects to operate in their own right, with seven or eight years in our operations, and they're around late twenties, at their absolute best.

Some specific thoughts that have emerged from our discussions to date:

- There exists a potential safety gap in the proposed regulations whereby the Operator will no longer be able to assess a crew members standard and will have to rely entirely upon the training records/report generated by the unspecified 'foreign (by necessity in our sector) training provider'.
- In an airline system, the Part 142 culture already exists, and the pilot candidate experiences an integrated training program throughout the ground school/simulator/line training schedule

Following the proposed changes, a Learjet or like type candidate will search for and complete the most cost effective type rating course, then return to Australia where CASA will process the licence validation, and then present to the operator having never demonstrated his/her skills to an Australian Examiner or Instructor.

- Foreign training providers have varying levels of quality and consistency, and being commercial ventures, will not always have the interests of the 'single customer' in mind.

- A 142 organisation could be aligned with the 217 or 119 of a specific operator, and perhaps could develop a Restricted Type Rating similar to the current co-pilot one, which could be operator-specific, subject to an approved progressive and prescriptive syllabus, with clear skill based targets.

This may take many hours to achieve, but will be possible with appropriate integration in the training program, and would culminate at some point in the future, if the trainee satisfies the criteria, in an unrestricted Type Rating, enabling normal PIC privileges.

- The requirement for 'Captain' Type Ratings for both pilots in all transport category aircraft precludes the employment of lower experience crew members.

Shortstop and Jet City have 50 years of combined success in training competent and safe command pilots from low experience commencement levels.

Their safety culture is based on solid mentor/student relationships within the organisation.

Employment of relatively high time 'co-pilots' will upset and degrade the existing mentor culture.

- Current training under our 217 training program probably well exceeds the prescriptive requirements of a foreign provider. (See FAA part 91/135 lack of any prescribed training for co-pilots other than three takeoffs and landings.)

We're fully aware of the stated CASA policy to mandate simulator training for all emergency training in stipulated types; we submit that a carefully tailored syllabus can be developed that enables adequate training in this area safely and efficiently in generic devices in most cases.

We're not aware of any accidents or incidents in business jet aircraft in emergency training scenarios in Australia, or other than the Sydney WW24 limited panel scenario, which we submit should not have been carried out at night.

- If a 142 is too onerous for an operator like us, then the entire flight training program becomes based outside Australia.

We do not see this as an improvement in safety, rather the reverse.

Shortstop intends to satisfy the requirements to be granted a '142 approval, with the aim being to work in conjunction with Jet City to process our combined required training needs, as well as whatever others may be required in the future.

The following are the thoughts of Brenton Skinn, a classic example of a young person who's been with Shortstop for seven years.

We think it's worthwhile to leave them just as he's expressed, acknowledging that there's some overlap in the previous points.

Brenton joined at age 19, with limited operational and flying experience.

Over the next two years, he worked in support ground roles, and commenced flying as a Citation co-pilot.

He transitioned to the Lear 35A, and when we introduced a Merlin IIIB into service six years ago, commenced intensive training and line flying on this type.

(We reckon the Merlin is the most demanding handling aircraft of pretty well the whole GA fleet, and its operations are mostly into basic regional ports, requiring much assessment and consideration.)

He flew as co-pilot and PIC ICUS on the Merlin for three years before we considered he was ready to operate in his own right, and is now the main PIC for it.

In addition to that, he's qualified as PIC on the Hawker 800/1000, and has commenced training as a training and checking Captain on the Citation 550.

He's now 27, with 90% on of his total time on complex turbine aircraft, with 500 + ICUS.

On attainment of an ATPL, Brenton will be well qualified to meet the challenges of an aircraft commander in our business, with eight years of operational experience to draw upon

His other duties include CASA liaison on AOC matters, and extensive operations supervision and management.

His story echoes many others at Shortstop and Jet City, and we seek to preserve that capability, whilst embracing the aims of Part 61.

Brenton Skinn:

The main argument is that the new regulations abolishes the 'co pilot' type rating. We feel this is an unnecessary change to the rules that affects the overall safety of operations, the safety culture of the organisation that has been built over a long period of time and the control and quality of training of company personnel for the following reasons:

- The company will have to employ pilots with the qualification only, not because of the quality of person and standard of flying; as a result the company safety culture is disturbed with people that don't fit within the organisation.

- The company loses the direct control and oversight of the employee's training and progression, affecting the standard of the pilot. Instead the company has lost the opportunity to hire young people that we once were; the young people that were available will be driven away from this sector due to increase cost and lack of opportunity for themselves. As a result, the company will be forced to hire pilots that aren't suitable but hold the qualification.

- These changes were modelled on the FAA; however the FAA and the ICAO have a rule that allows a second pilot who is not rated to act as a co-pilot under certain circumstances.

As a result we are requesting that a similar modification to the new regulations be put in place to allow the company to employ smart, young, and eager people into our organisation and act as right hand seat pilot. We understand that there must be two 'type rated' pilots.

This could be in the form of an unrestricted or command rated pilot, and the other a restricted type rated pilot. Where, either company specific or not, this pilot must not assume the role of PIC.

We understand and welcome most of the changes, including the abolishment of the co-pilot instrument rating, the new Part 142, etc., however safety is directly affected let alone the commercial affects this has on a small business.

We feel the corporate sector has been overlooked, as it seems the new regulations are driven towards the scheduled airline model.

What do we seek?

Consideration to be given to developing a capability under a '142 certificate to train pilots for a type rating, with a syllabus similar to the current one for co-pilots.

This rating could be designated as a 'specific' or 'limited' or 'operator specific' one, and subject to an agreed schedule of rights and limitations that reflect the requirements of the operators.

It should embrace the concept that it is the initial step in attainment of a full rating, subject to the trainee satisfying criteria to be determined and approved, over a period of employment with the operator nominated.

The full, without restriction command type rating training and endorsement to be carried out under our approvals at the most appropriate time of the pilot's tenure and capability.

Instrument training to be carried out concurrently with type training, resulting in the appropriate rating being issued when required.

Consideration to be given to approval for the emergency training manoeuvres designated as 'dangerous' to be carried out in an approved non-type-specific simulator in Australia rather than requiring travel to overseas type specific units.

The recent development and availability of excellent, low cost simulators such as the Redbird series makes this a practical and desirable option, we believe.

We believe that the requirement to go to a simulator to conduct exercises such as EFATO in types that are inherently simple and easy to handle such as the Hawker series is excessive.

When the record of this type of emergency is considered under any of the risk assessment tools currently used, it seems to us that the combination of its very low likelihood and simple handling procedures make this concentration of effort and expense excessive.

We welcome and appreciate this opportunity to discuss these matters with you, and look forward to the process.

Shortstop Jet Charter.

Jet City.

Here's a possible training syllabus for a limited type rating, prepared by Brenton Skinn and Althea Allen, another of our rising young commanders:

(We present this as an example only, it reflects to a large degree our current practice, and could form a basis for the process.)

Second Class 'Type' Rating Training Syllabus

Induction: (4-8 weeks)

Includes:

Induction process (Forms, DAMP, SOPS, Operations Manual, SMS)

Ground Crew Training Course (IAW each of the companies GC training course)

Trial Period (3-6 months)

This period allows both parties to ensure that the candidate is suited for the position and in sync with the company's safety and business culture.

Endorsement (2-4 months)

The below endorsement syllabus will only occur if the above time and items have been completed.

Aircraft Technical Engineering Training (1-2 months) - to be completed in house by other type rated pilots as a learning exercise, supervised by a type rated flight examiner

Written Technical Exam (1-2 days)

Extensive Cockpit Procedural Training, (1-2 months / concurrent with the Technical training) covering normal and abnormal procedures / checklist procedures

Second Officer (Safety Pilot) Training (at least 10 sectors of LOFT training)

Pre and Post flight briefings

Flying training:

Initial flying training sortie

(Take-off and Landing, normal in flight manoeuvring (turns (steep/medium), phases of flight (climb, cruise and descent profiles), circuit training, limited panel, instrument approaches, handover and takeover procedures, missed approaches, holding, unusual attitudes recovery, approach to stall recovery)

Endorsement Check Flight:

An instrument approach at destination and origin.

CRM

Post Endorsement Training (3-6 months)

25 hours of flying with a flight examiner as the PIC.

A LOFT flight check (Proficiency check 2) at the end of the 6 months.

Recurrent training (3-6 months)

Technical Engineering Refresher with Exam

Flight check (Proficiency check 1) at the end of the 6 months

This allows the pilot to be checked twice a year.