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General Aviation Accidents Related to Exceedance of Airplane Weight/Center of Gravity Limits

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24 **ABSTRACT**

25 Background: Obesity, affects a third of the US population and its corollary occupant weight
26 adversely impacts safe flight operations. Increased aircraft weight results in longer
27 takeoff/landing distances, degraded climb gradients and airframe failure may occur in
28 turbulence. In this study, the rate, temporal changes, and lethality of accidents in piston-
29 powered, general aviation aircraft related to exceeding the maximum aircraft weight/center of
30 gravity (CG) limits were determined.

31

32 Methods: Nation-wide person body mass were from the National Health and Nutrition
33 Examination Survey. The NTSB database was used to identify accidents related to operation of
34 aircraft outside of their weight/CG envelope. Statistical analyses employed T-tests, proportion
35 tests and a Poisson distribution.

36

37 Results: While the average body mass climbed steadily ($p < 0.001$) between 1999 and 2014 the
38 rate of accidents related to exceedance of the weight/CG limits did not change ($p = 0.072$).
39 However, 57% were fatal, higher ($p < 0.001$) than the 21% for mishaps attributed to other
40 causes/factors. The majority (77%) of accidents were due to an overloaded aircraft operating
41 within its CG limits. As to the phase of flight, accidents during takeoff and those occurring
42 enroute carried the lowest (50%) and highest (85%) proportion of fatal accidents respectively.

43

44 Conclusion: While the rate of general aviation accidents related to operating an aircraft outside
45 of its weight/CG envelope has not increased over the past 15 years, these types of accidents
46 carry a high risk of fatality. Airmen should be educated as to such risks and to dispel the notion
47 held by some that flights may be safely conducted with an overloaded aircraft within its CG
48 limits.

49 Highlights:

- 50 • the rate of weight/CG-related general aviation accidents is static since 1999,
- 51 • weight/CG-related accidents are more often fatal than those due to other causes,
- 52 • of all phases of flight, the highest proportion of fatal accidents are enroute,
- 53 • the majority of accidents are due to an overloaded aircraft within its CG limits.

54

55 Keywords: general aviation accidents, aircraft weight and balance, obesity.

56 **1.0 INTRODUCTION**

57 Obesity (body mass index of ≥ 30 kg/m² [Krueger et al., 2014]) is at epidemic proportions
58 in the United States affecting a third of the population (Center for Disease Control [CDC],
59 2015a; Flegal et al., 2012). Occupant weight, as a corollary of obesity, is germane to safe flight
60 operations (FAA, 2007) especially for general aviation (all civilian aviation apart from operations
61 involving paid passenger transport) where usable payloads are modest. Indeed, the limited
62 usable loads for general aviation (even more restrictive for light sport aircraft [Pagan et al.,
63 2006]) is best exemplified by the four seat Cessna Skyhawk (the most popular single engine
64 aircraft manufactured, which fully fueled, is limited to 600 lbs. for occupants and cargo (Cessna,
65 2015). For safe flight operations, airplane loading should not exceed the maximum certified
66 weight specifications and be within the center of gravity (CG) limits, data documented by the
67 manufacturer (Federal Aviation Administration [FAA], 2007) as part of aircraft certification.

68 Increased aircraft weight, whether attributed to the occupants, accompanying cargo or
69 both, adversely affects aircraft performance in a variety of flight parameters. For example,
70 longer takeoff and landing distances are evident for a heavier aircraft and climb gradients are
71 degraded (FAA, 2007, 2008). The consequence of such decreased performance could be a
72 runway excursion (of particular concern when the runway is followed by descending terrain or
73 water) or the inability to clear rising terrain in the flight path. Moreover, airframe failure may
74 occur under turbulent flight conditions where the aircraft is loaded beyond its maximum certified
75 weight or outside of its CG limits (FAA, 2007). Importantly, the aforementioned weight-
76 dependent performance degradation is further exacerbated by a performance penalty
77 associated with an aging aircraft. As of 2014, the average age of the general aviation, single
78 engine aircraft exceeds 30 years (General Aviation Manufacturers Association, 2014).
79 Performance of aging aircraft often diminishes from that stated in the pilot operating
80 handbook/flight manual largely due to airframe deterioration (causing parasitic drag), weight
81 gain (e.g. addition of after-market products, detritus) and reduced engine performance (Airbus,

82 2002; FAA, 2007). Finally, exceeding the CG limits of an aircraft may make recovery from an
83 aerodynamic stall impossible due to loss of elevator control authority (FAA, 2007).

84 A final emerging concern is the recent proliferation of non-FAA approved software
85 applications for aircraft weight-CG determinations. These allow for an expedient determination
86 of aircraft weight and CG location in a non-arduous manner compared with a standard loading
87 graph provided in the pilot operating handbook/flight manual. However, these applications utilize
88 a generic aircraft not taking into account modifications (e.g. new avionics, air-conditioner,
89 residual wiring) which alters usable loads/CG limits for the end user.

90 Currently, there is little peer-reviewed published research on general aviation accidents
91 related to exceeding the allowable certified weight and/or the CG limits. The comprehensive
92 Joseph T. Nall Report (Kenny, 2015) (hereafter referred to as the Nall Report) provides data for
93 only weight-related general aviation accidents which occurred during the takeoff/climb phase of
94 flight and for which density altitude was a factor. Moreover, the high obesity rates for the
95 American population (Flegal et al., 2012) (increasing the potential for aircraft over-loading), the
96 proliferation of non-FAA-approved weights and balance software applications, and the degraded
97 performance associated with aircraft aging are of particular concern. Therefore, the current
98 study was undertaken to determine: the rate, temporal changes, and lethality of accidents in
99 piston-powered, general aviation aircraft related to exceeding the maximum aircraft weight/CG
100 limits.

101 **2.0 MATERIALS AND METHODS**

102 **2.1 Procedure**

103 Body mass for persons age 16 years of age or older were derived from measurements
104 made by the National Health and Nutrition Examination Survey (NHANES) (CDC, 2015b), a
105 survey of the non-institutionalized US population. Body mass data were adjusted using the
106 mobile exam center (MEC) exam weight to correct for over-sampling and non-response

107 (Centers for Disease Control and Prevention, 2016). Records with null weights were deleted
108 from the study.

109 The NTSB Access database (Oct 2015 release) was downloaded (National
110 Transportation Safety Board, 2015) and queried for accidents in piston-powered (1-2 power
111 plants) airplanes operating under 14 CFR Part 91. The term weight was included in the query of
112 the narrative cause field of the database. Search criteria were used to exclude accidents
113 involving: air medical flights, aerial observation or application, airshows, flight instruction,
114 airdrops, glider tows and flight tests. The narrative causes of the exported data were manually
115 parsed for accidents unrelated to exceedance of aircraft weight/CG limits (e.g. crankshaft
116 counterweight) which were subsequently deleted. To be included in the current study, either an
117 exceedance of the maximum certified gross weight and/or the CG limits had to be cited by the
118 NTSB report (probable cause section) as causal or a factor in the accident. Annual fleet activity
119 for piston-powered general aviation aircraft was obtained from the General Aviation and Part
120 135 Activity Surveys (FAA, 2015). A fatal accident was any in which one, or more, occupants
121 perished within 30 days of the crash as defined following 49 CFR 830 (Electronic Code of
122 Federal Regulation, 2010).

123 2.2 Statistical Analysis

124 All statistical analyses were performed using SPSS (v22) software. A p value of <0.05
125 was used as cut-off for statistical significance.

126 An Independent Samples T-test was used to determine if the weighted, average nation-
127 wide person body mass (≥ 16 years of age) for a specific period differed from the prior period.
128 Equal variances were not assumed when Levene's Test for Equality of Variances was
129 statistically significant ($p < 0.05$).

130 A generalized linear model with Poisson distribution (log-linear) was employed to
131 determine if the rate of accidents ascribed to exceedance of maximum weights and/or CG

132 changed relative to the initial period (1988-1994). The natural log of the annual fleet activity for
133 piston-powered aircraft averaged over the indicated period was used as an offset.

134 Contingency tables employed Pearson Chi-Square (2-sided test) to determine where
135 there were statistical differences in proportions. If the expected minimum count was less than
136 five the Fisher's Exact Test was used instead (Field, 2009). P values for cells in multinomial
137 tables were derived from adjusted standardized residuals (Z-scores) in post-hoc testing.

138 **3.0 RESULTS**

139 **3.1 Increase in Nation-wide Person Weight in the USA.**

140 Temporal changes in body mass data for the US population was first determined.
141 Towards this end, NHANES data (CDC, 2015b), collected over consecutive two year periods as
142 part of a continuous program implemented in 1999 (CDC, 2015b) were employed. The body
143 mass of the average American steadily climbed over the NHANES continuous program (Figure
144 1A). For 1999-2000, the average person body mass was 174.3 lbs. increasing to 181.5 for the
145 years 2013-2014. Across the study period, increases in body mass between consecutive
146 periods were strongly statistically significant ($p < 0.001$).

147 **3.2 Rate of Accidents Related to Aircraft Weight/CG Limit Deviations.**

148 The increasing body mass of the US population over time raised the question as to
149 whether a parallel climb would be evident for the rate of general aviation accidents ascribed to
150 operating the aircraft outside of its weight/CG envelope. For increased statistical power,
151 accidents were aggregated into 5 year periods. For the initial period (1999-2003), 45 general
152 aviation accidents (2.3/million flight hours) in piston-powered aircraft were related to exceeding
153 the maximum certified weight and/or the CG limits (Figure 1B). However, there was little
154 evidence of a change over time with a comparable rate (2.4/million flight hours) for the most
155 recent period (2009-2013). A rate analysis (Poisson distribution) indicated no change in
156 accident rate between the first and most recent periods ($p = 0.072$).

157 **3.3 Lethality of Accidents for which Transgression of Weight/CG Limits was Causal or a Factor.**

158 The prior data indicated no temporal change in the rate of accidents related to operating
159 the aircraft outside of its weight/CG envelope. The next question posed was whether such types
160 of accidents vary in risk of a fatal crash compared with those unrelated to weight/CG
161 exceedance. To answer this question, the fraction of fatal accidents related to exceeding the
162 approved weight and/or CG limits was then compared with that for mishaps ascribed to any
163 other reason. Hereafter, the query period was extended prior to 1999 (the first year of the
164 continuous NHANES survey) to 1988 to increase the robustness of statistical testing. The latter
165 year was chosen due to the limited NTSB database storage in the early 1980s (and prior) which
166 precluded the inclusion of complete narratives (personal communication with Dr. Loren Groff
167 NTSB) required for the current search strategy.

168 Surprisingly, of the accidents for which deviation beyond the allowable weight and/or CG
169 limits was deemed causal or contributory, 57% were fatal (Figure 2). This was substantially
170 higher ($p < 0.001$) than the 21% for accidents unrelated to operating the aircraft outside of its
171 weight/CG envelope.

172 3.4 Segregation of Accidents into those Ascribed to Exceedance of Maximum Weight or CG 173 Limits.

174 The proportion of accidents related to either exceeding the maximum allowable weight,
175 CG limit or both was then determined. Of the accidents related to operations outside of the
176 weight/CG envelope, 266 could be categorized without ambiguity. Interestingly, the
177 overwhelming majority (77%) of accidents were related to an overloaded aircraft operating
178 within its CG (Figure 3). In contrast, the minority (5%) of accidents were solely ascribed to a CG
179 located forward or aft of the designated limits (i.e. not exceeding the certified aircraft maximum
180 weight). The low fraction of accidents ascribed to the latter scenario could reflect the fact that
181 pilots sit at stations with set arms with the consequence that heavier pilots would not lead to an
182 aircraft outside of its CG limits. A combination of both factors accounted for the remaining 18%
183 of the accidents.

184

185 3.5 Fatal Accident Proportion as a Function of Excess Weight.

186 Anecdotally (Cook, 2015) some general aviation pilots consider operating an aircraft
187 weighing in excess of that for which it is certified but which is within its CG limits to be safe. To
188 address this premise, the fraction of fatal accidents was determined as a function of excess
189 weight. Accidents related to weight in excess of that certified for the aircraft (for which the
190 aircraft was within its CG limits) were separated into quartiles based on this parameter. From
191 the NTSB records, the excess weight over that allowable could be quantified for 183 accidents.
192 Interestingly, the proportion of fatal accidents (Figure 4) corresponding to aircraft in the two
193 lowest quartiles of excess weight was higher than the third and fourth quartiles (123-230 and
194 >230 lbs.). In fact post-hoc analysis indicated that the 123-230 lbs. overweight group was
195 under-represented for fatal accidents ($p=0.021$). These data would argue against the contention
196 that lower loads in excess of that for which the aircraft is certified are associated with a
197 decreased risk of a fatal accident.

198 3.6 Categorization of Weight/CG-Related Accidents by Phase of Flight.

199 Accidents were then categorized by phase of flight. Not unexpectedly, the majority (77%)
200 of all accidents related to operating the aircraft outside of its weight/CG envelope occurred
201 during the takeoff-climb phase (Table 1). However, somewhat surprisingly, this phase of flight
202 carried the lowest fatality rate (50%). In contrast, while accidents during the approach/landing
203 phase were far fewer (8%) a substantially higher percentage of these mishaps were fatal (78%).
204 Similarly, accidents occurring enroute comprised only 15% of all the accidents but nevertheless
205 carried the highest proportion of fatal accidents (85%). In post-hoc testing, fatal accidents were
206 over-represented in both the approach-landing ($p=0.004$) and enroute ($p<0.001$) flight phases.

207 4.0 DISCUSSION

208 It was initially hypothesized that high obesity rates for the US population combined with
209 a proliferation of non-certified FAA software applications for weight/balance calculations and

210 degraded performance of an aging general aviation fleet would conspire to increase the rate of
211 accidents related to exceedance of weight/CG limits. However, there was little evidence of such
212 a trend at least for piston-powered aircraft operating under 14 CFR Part 91 regulations.
213 Nevertheless, the high fraction of fatal accidents (50-85% depending on the phase of flight)
214 related to over-loading and/or deviating from the CG limits of the aircraft was surprising and
215 disconcerting as these proportions are well above the 18-22% cited for all causes of general
216 aviation accidents (Kenny, 2015; Wiegmann and Taneja, 2003).

217 The high proportion of fatal accidents related to operating the aircraft outside of its
218 weight/CG envelope merits discussion. Several potential reasons could contribute to the
219 lethality of such accidents. First, increased aircraft weight demands increased lift; as a corollary
220 landing speed increases (FAA, 2008). Consequently and since the impact force exerted on the
221 occupants is a square of the velocity (Freitas, 2014), crash forces exerted on occupants of an
222 aircraft loaded beyond its maximum certified weight is increased. Second, a degraded climb
223 gradient could result in controlled flight into terrain which carries a 12 fold elevated risk of a fatal
224 outcome (Thomas et al., 2000) at least for air taxi operations in Alaska. Third, an
225 aerodynamically stalled condition for an aircraft loaded outside of its aft CG limit (FAA, 2007)
226 may lead to a “flat spin” a condition difficult to recover from. Finally, airframe failure may occur
227 under turbulent flight conditions where the aircraft is loaded beyond its maximum certified
228 weight (FAA, 2007).

229 Noteworthy was that the majority of accidents for which the aircraft was loaded beyond
230 its approved maximum weight but within its CG limits were fatal. Anecdotally, a misconception
231 among some general aviation pilots (Cook, 2015) is that an over-gross aircraft within its CG
232 limits may be operated safely. However, there was little evidence to support such a contention
233 insofar as the fraction of fatal accidents was not diminished for a lightly over-loaded aircraft
234 compared with a heavily overloaded aircraft.

235 Considering the ascendancy in obesity for the US population the observation that this
236 trend was not paralleled by a temporal rise in general aviation accidents related to transgression
237 of the aircraft weight/CG limits was unexpected. Furthermore, the proportion of all accidents
238 related to aircraft weight limit deviations was not elevated for the ten states with the highest
239 obesity rates in comparison with the ten least obese states (data not shown). Several factors
240 might explain these unexpected findings. First is that airmen are practicing due diligence as part
241 of the pre-flight weight/CG calculations mandated per 14 CFR91.103. Another more plausible
242 explanation is that, unlike revenue-driven operations conducted under 14 CFR Part 121, general
243 aviation activity may be predominated by operations made at less than full occupancy (e.g. two
244 of four occupied seats). In such an instance the aircraft weight, inclusive of obese occupant(s),
245 may still be within the maximum allowable weight.

246 Although the author is unaware of any peer-reviewed publications on the subject of
247 general aviation accidents related to aircraft weight/CG limit exceedance, according to Kenny,
248 data on total and fatal accidents regarding aircraft overloading is available via the Nall Report
249 (Kenny, 2015). Indeed, the 22rd-24th editions of this report covering general aviation accidents
250 over the 2010-2012 period documented that for mishaps related to operating an aircraft outside
251 of its weight/CG envelope, 13% (4 of 31) were fatal. This proportion was lower than the 57% for
252 the period spanning the current study. Several reasons could contribute to this divergence: (a)
253 differing search strategies, (b) and/or varying time frames, (c) and/or the Nall Report restricting
254 its count to accidents during the climb phase of flight for which density altitude was involved.
255 Indeed, the present study showed that the lowest fraction of fatal accidents was evident for the
256 take-off-climb phase. In contrast, accidents occurring enroute, not addressed by the Nall Report,
257 carried the highest proportion of fatal accidents (85%).

258 The current study was not without its limitations. First, it represented a retrospective
259 investigation. Second, it was often unclear from the NTSB report whether the exceedance of the
260 aircraft weight limits was due to the human occupants or the cargo itself. Third, if there was a

261 bias in the number of totally destructive (and hence fatal) accidents towards the higher end of
262 the excess weight spectrum (Figure 4) assessments of weights for the corresponding subset of
263 accidents may not have been possible. Such a scenario would lead to an under-representation
264 of the number of fatal accidents at higher loads in excess of the maximum approved (Figure 4).
265 Finally, it is possible that the search strategy used herein missed reports related to aircraft
266 weight/CG limit deviations.

267 In conclusion the rate of general aviation accidents in which the aircraft was operated
268 outside of its weight/CG envelope was static over time. Nevertheless, and importantly, these
269 types of accidents carry a higher risk of fatality compared with mishaps resulting from other
270 causes. Increased emphasis needs to be placed on airman education to dispel the notion held
271 by some (Cook, 2015) that flight operations with an overloaded aircraft within its CG limits are
272 safe as well as the limitations of using non FAA-approved weight/CG software applications. As a
273 final note, airmen should exercise caution in using self-reported occupant weights for
274 weight/balance determinations as these often represent under-estimates (Shiely et al., 2010).

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329 **FIGURE LEGENDS**

330 Figure 1. Increase in Nation-Wide Body Mass and Rate of General Aviation Accidents Related to
331 Operations Outside of the Weight/CG Envelope.

332 PANEL A. Average body mass (lbs.) for Americans 16 years of age and older are shown
333 for the indicated periods. Population sample sizes for the 1999-2000, 2003-2004, 2005-2006,
334 2009-2010 and 2013-2014 periods were 5,487, 5,791, 5,807, 6,649 and 6,199 respectively. A T-
335 test was used to determine if the average (weighted) body mass per capita differed statistically
336 between consecutive time frames. * $p < 0.001$. PANEL B. The accident rate for aircraft operating
337 outside of the weight/CG envelope is shown for the indicated periods. A Poisson distribution
338 was used to determine if the rate of accidents differed between the initial (1999-2003) and the
339 final (2009-2013) time periods. n, accident count.

340 Figure 2. Fatal Outcome for Accidents Related or Unrelated to Weight/CG Exceedance.

341 Accidents related (Weight/CG Limit Exceedance) or unrelated (Unrelated to Weight/CG
342 Exceedance) to exceedance of the maximum aircraft weight and/or CG limits were categorized
343 as fatal or non-fatal. The percentage of fatal accidents is shown. n, number of fatal accidents. A
344 contingency table (Pearson Chi-Square) was used to determine if the difference in proportion of
345 fatal accidents was statistically significant between the two groups.

346 Figure 3. Categorization of Accidents based on Exceedance of Maximum Weight or CG Limits.

347 Accidents related to operating the aircraft outside of its weight/CG envelope were
348 categorized as exceeding the maximum allowable weight, CG limits or both. Seven cases were
349 excluded from the analysis due to ambiguities in the NTSB report. n, accident count for the
350 indicated category.

351 Figure 4. Relationship between Variations in Excess Aircraft Weight and Fatal Accidents.

352 Accidents related to a weight in excess of that for which the aircraft was certified (but for
353 which the airplane was within its CG limit) were divided into quartiles based on the amount of
354 excess weight. The values above the column indicated the percentage of fatal accidents for the

355 corresponding quartile. A Pearson Chi-Square indicated an overall difference in proportions
356 ($p=0.014$).

357 **TABLE LEGEND**

358 Table 1. Phase of Flight and Fatal Accidents.

359 Accidents related to operation of the aircraft outside of its weight/CG envelope were
360 categorized by phase of flight. The enroute phase included maneuvering aircraft. A Pearson
361 Chi-Square test indicated an overall difference in proportion of fatal accidents for the three
362 phases of flight ($p<0.001$). The contribution of each cell (phase of flight) to the overall difference
363 in proportions was determined using adjusted residuals (z-scores) in post-hoc testing to derive a
364 p value.

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Figure 1
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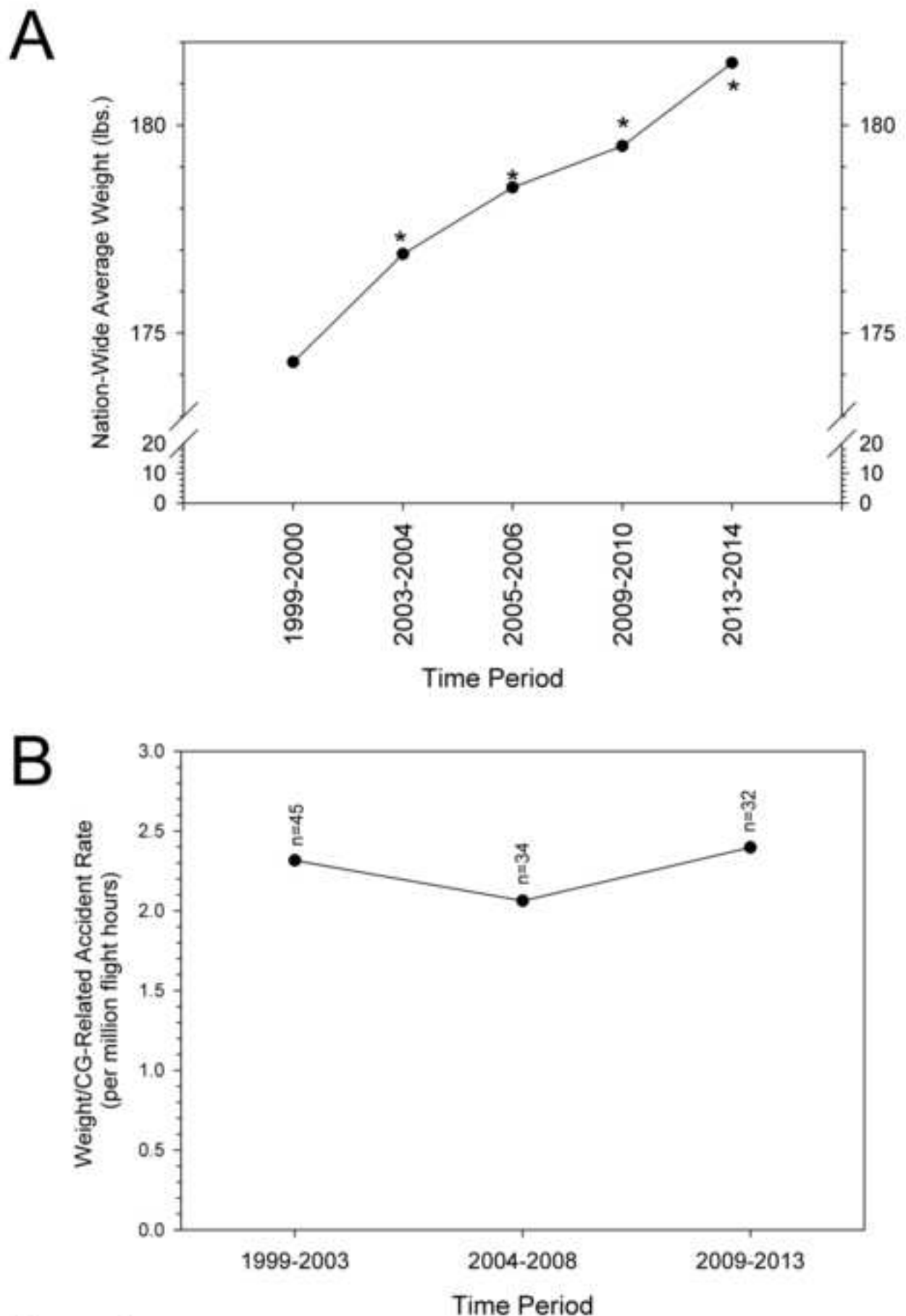


Figure 1

Figure 2

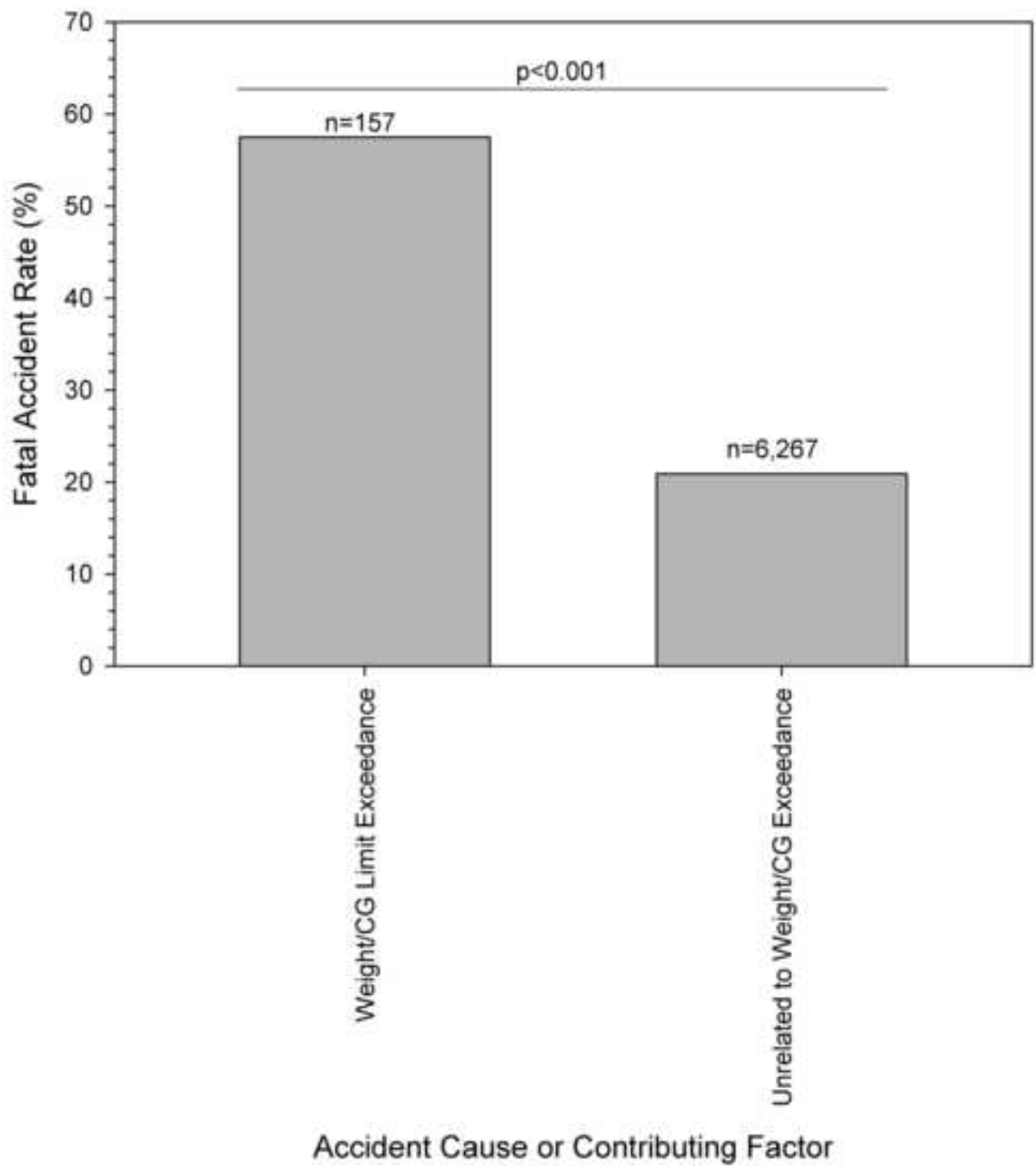


Figure 3
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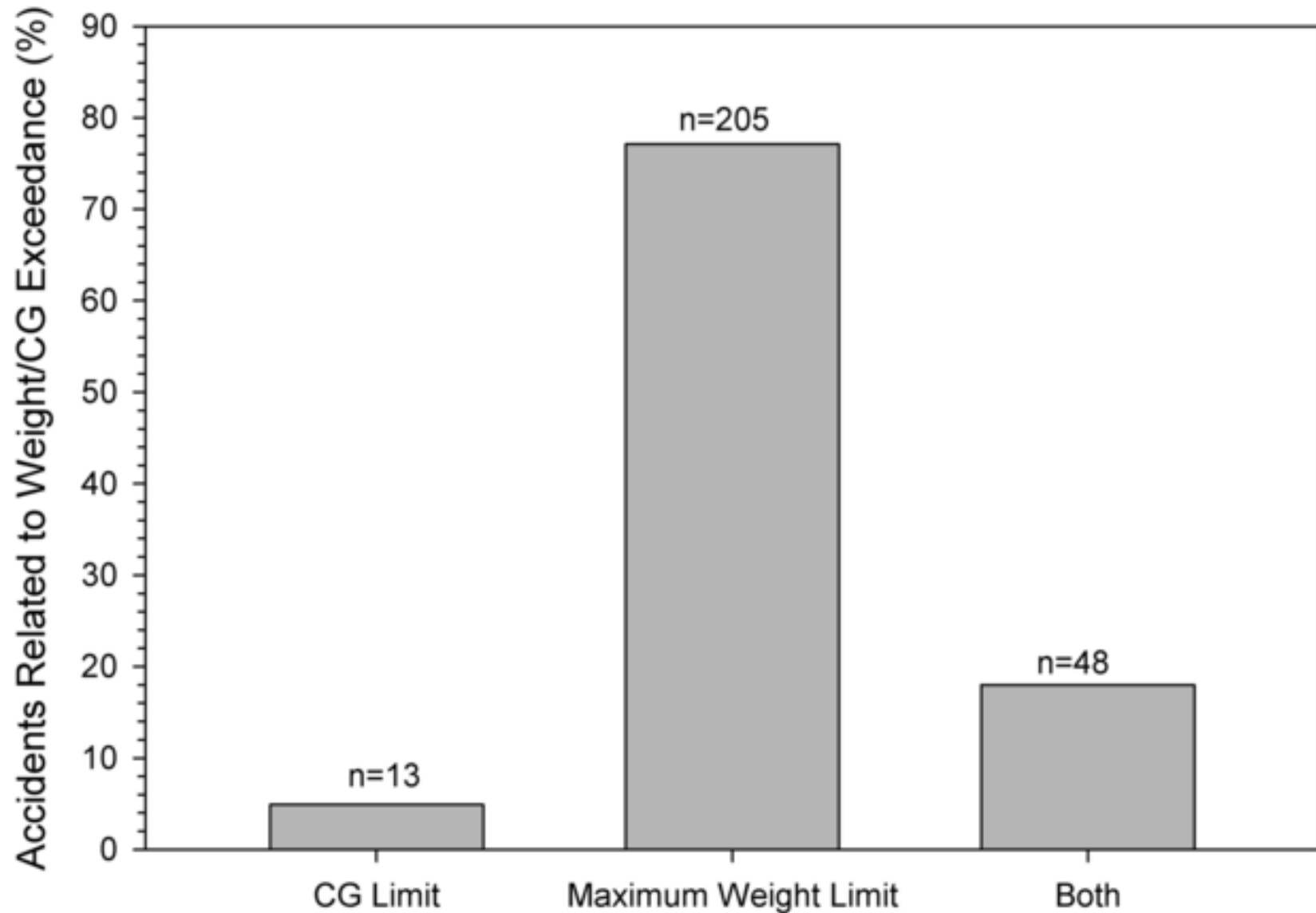


Figure 3

Figure 4
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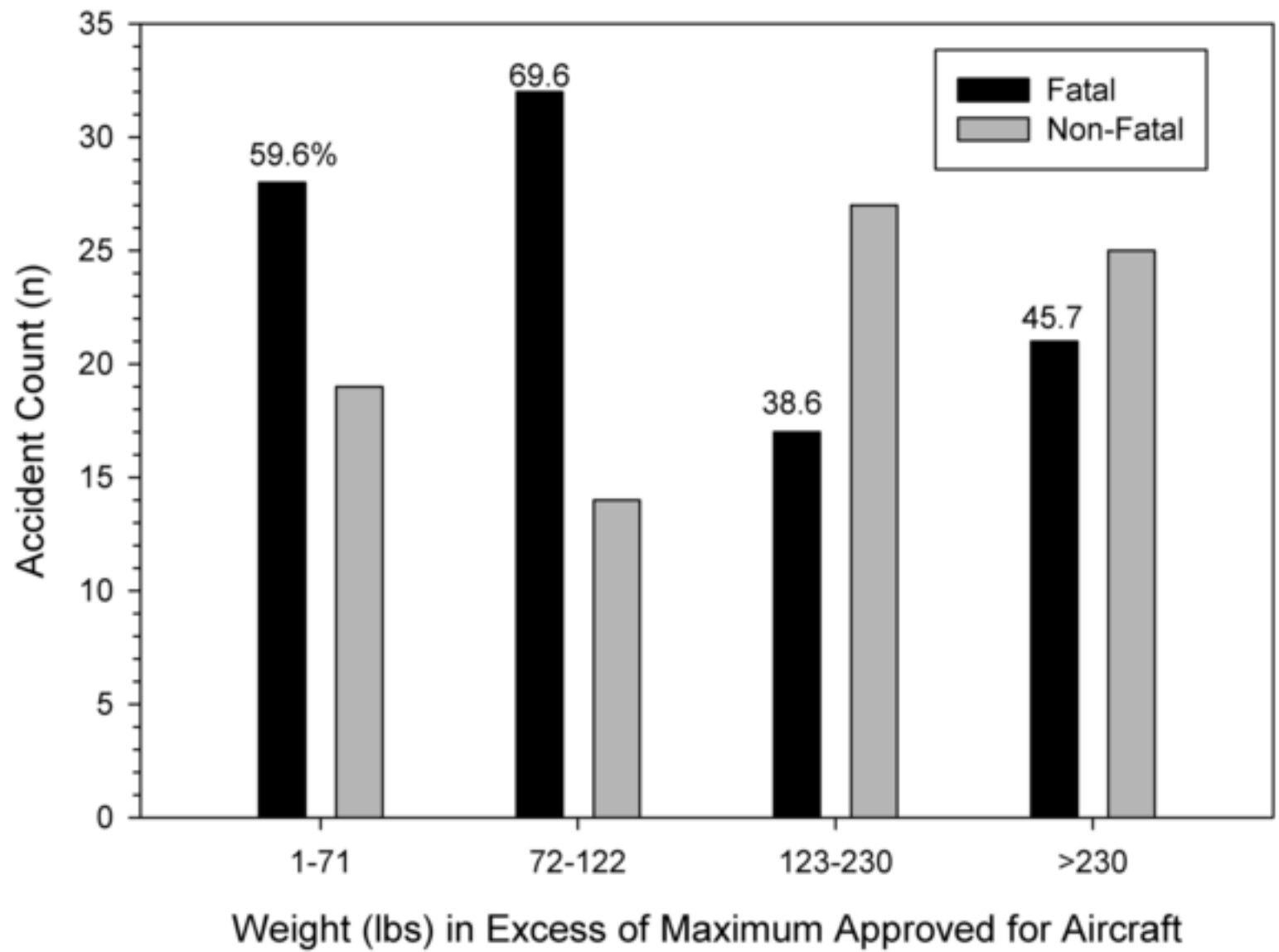


Figure 4

Table 1

	Accident Count					
Phase of Flight	Total n, (%)	Fatal (n)	Non-Fatal (n)	Fatal (%)	z-Score	p Value
Approach/Landing	23 (8)	18	5	78	2.1	0.036
Enroute	40 (15)	34	6	85	3.8	<0.001
Takeoff-Climb	209 (77)	104	105	50	-4.6	<0.001