Colgan Air Accident-Driven Changes to Part 121 Flight Operations: It is Time for Phase Two (Editorial)

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It has been just one year since the Federal Aviation Administration (FAA) mandated a minimum of 1500 total flight hours for all part 121 pilots and the implementation of the corresponding 3-tier restricted Airline Transport Pilot (ATP) program based on reduced flight hours. So, how did we get here and are there any off-the-shelf alternatives to the three tiers to help get pilots into the left seat sooner?

In response to the 2009 Colgan Air Mishap in Buffalo and the subsequent congressional mandate, beginning August 2013, the FAA directed that all Part 121 air carrier pilots must possess an ATP certificate, historically earned at 1,500 total flight hours. No longer would a 250-hour commercially certificated pilot be able to fly right seat for the regional or major carriers. Also, in response to this accident, beginning January 2014, the FAA mandated more restrictive minimum crew rest policies.

However, responding to industry concerns about a pilot shortage caused by this change, the FAA created three restricted-ATP tiers. All former military-trained pilots could apply for their Restricted Airline Transport Pilot (R-ATP) at 750 total hours. All baccalaureate university professional flight graduates with 60+ aviation semester hours from the FAA’s eight specified academic categories could apply at 1,000 total hours. Students with an associates or bachelor degree with 30+ aviation semester hours could apply at 1,250 total hours. In all three cases, ATP candidates must have a minimum of 50 multi-engine hours and complete a newly designed ATP training course prior to taking this check ride.

Having just passed the first anniversary of the FAA’s 1500-hour rule implementation and given the pilot shortfall causing regional carriers to park aircraft, it is time to consider alternatives that meet both the concerns of congress and the concerns of the Colgan Air mishap families. The fact that the accident cause factors had nothing to do with aircrew total flight time or the lack of an ATP, is no longer relevant. The aviation industry and aviation educators are stuck with the task of minimizing the impact of this new law.

To my point, at a recent Aviation Accreditation Board International (AABI) convention in Nashville, TN, the director of the Regional Airline Association (RAA) announced that the next Aviation Rulemaking Advisory Committee (ARC) was tasked to discuss the 1500-hour rule, find solutions to its impact on the airline industry, and that “nothing was to be left off the table.” The RAA representative also discussed the role of the Colgan Air family watchdog group of lawyers that were ever vigilant to make sure that the FAA did not “roll back” the new Restricted ATP requirements. However, both the FAA and the
Colgan Air mishap watchdog committee have accepted that a military trained pilot can take their R-ATP ride at 750 total hours. It is my opinion that the military trained pilot was deemed “deserving” of a lower minimum due to the structure and compressed intensity in their approach to flight training and organizational procedures.

What constitutes a military style curriculum? In a word “structure, structure, structure” and many University Aviation Association (UAA) universities already have such structured programs. For example, in response to the Colgan Air-driven changes, a regionally accredited U.S. university, with a 16,000 total student body and 200 aviation students, recently retooled its entire aviation proflight program. The goal was to leverage the structure-based lessons learned by military aviation organizations to both improve aircrew training and safety, and to reduce historic excessive times-to-train.

In short, their entire collegiate flight-training model was transformed into a military version of General Aviation (GA) flight training by following the Naval Aviation Training Command (NATC) template. All flight lesson grade sheets were reformatted into NATC Aviation Training Forms (ATFs) and associated Maneuver Description Guides (MDGs) were created. Each MDG, that is, Private single engine land (SEL), Private multi-engine land (MEL), Instrument SEL/MEL etc., contained step-by-step instructions for every graded event listed on each respective ATF.

Additionally, they created military style:
- Triply redundant maintenance practices with quality assurance (QA) inspections. Every squawk is corrected by an FAA certified Airframe and Powerplant (A&P), checked by another A&P Inspection Authority (IA), and finally a post maintenance test flight is flown by the maintenance check pilot.
- Quarterly safety stand downs to roll back complacency,
- Aircrew and flight training standardization boards,
- Aircrew Review Boards (ARB) to evaluate student program continuance after demonstrating problems with aeronautical mastery.
- New staff managers in the organizational structure, i.e. Aircraft Maintenance and Aviation Safety.
- Aviation safety board formed from the most senior and experienced flight instructors to watch over and implement the university’s safety management system (SMS).
- Three-part crew rest policy that limits all pilots, student and instructor, to a 6 day work week. While not implemented by the FAA until
January 2014, but because crew rest was a contributing factor in this accident, this regional program established a university crew rest policy. All aircrew are required to stand down one day in seven. The crew day is limited to 12 hours. So, a student beginning his/her day at 8 a.m. for an academic class, cannot fly after 8 p.m. that evening. Finally, all aircrew are required to observe 9 hours of uninterrupted crew rest (dinner/sleep/breakfast) between each flying day.

In conclusion, there is no need to reinvent the wheel. Many U.S. collegiate aviation programs are already using military training models, such as the one discussed above. Perhaps this is because it was the military that first used aviation extensively during WWI and before there were widespread commercial applications. Or, perhaps it was because many of the early commercial pilots were former military pilots. In any case, the precedent has been set by the FAA, the Colgan Air families, and their watch dog lawyer groups, that a commercial pilot trained using military training techniques can be awarded a 750-hour restricted ATP. While this only represents a 250-hour reduction from the 1000-hour R-ATP, every hour reduction will help get new pilots into the right seat that much faster.

Recommendations:

- That the UAA membership, the regional airlines, and the major airlines press the FAA to reduce all 60-credit hour military style BS aviation programs, from their current 1000 hours, to the 750 total hours assigned to the military trained pilot R-ATP category.

- That the UAA membership push the regional and major airlines to consider providing scholarships for the aviation students they select as part of their college “pathway” programs. Inadequate funding represents the number one cause of flight student’s attrition at most universities. Many regional carriers have already begun interviewing university aviation students with their instrument rating as part of these pathway programs. Pending a successful interview, the regionals are offering them first officer jobs on the spot, contingent upon degree completion and the attainment of 1000-hours, along with the other ATP requirements. With some form of a “payback” contract, this one action could increase university proflight graduation rates by 30-50%. And... coupled with a reduction to 750 total hours, these graduates would be flight deck-ready 250 hours sooner.

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