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The Honorable Michael P. Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Huerta:

We, the Regional Air Service Alliance (RASA), write in response to the letter you received from Senator Kirsten Gillibrand and six other Senators on October 13, 2016 regarding a Federal Aviation Administration (FAA) working group that is studying the issue of what constitutes an adequate number of training hours required to be a commercial first officer.

RASA is an organization comprised of airports of all sizes that have come together to address the many structural impediments facing small community air service in the US. **There is not one airport executive that comes to work every day where safety is not their number one priority.** The issue of pilot supply has become a major issue that is reducing, and will further reduce, the level of air service at our nation's small communities. Based on rigorous analysis, there are 150-200 communities at risk of seeing a total, or near total, loss of their commercial air service because of unresolved industry issues.

While a tenet of the 1978 Airline Deregulation Act, fostering small community air service is proving to be a broken promise of yesterday's deregulators and today's Federal Government. The unintended consequence of lawmakers legislating the number of training hours required is propagating a further loss of small community air service. Ironically, four of the seven Senators signing the Gillibrand letter represent states most at risk of losing small community air service – California, Pennsylvania and New York.

WHY SHOULD AIRPORTS CARE?

Airports care because the US airport industry facilitates a system that carries 2,000,000 people each and every day; and airports provide the infrastructure for an industry that flies 27,000 passenger and cargo flights every day. The US airline industry drives **\$1.5 trillion** in economic activity every year and rely on airports to do so.

Airports are economic engines of their respective communities. Losing air service for a community means: reduced economic activity; a risk of being erased from tomorrow's trading map; reduced tourism spend; and losing attractiveness as a place where a business might locate or re-locate. A loss of service means that competition is likely reduced. This fact has been playing out at a number of New York airports over the past months. In short, losing air service will take our nation's small communities off the grid and prevent them from reaching their economic potential. The loss of this vital connection will drive them towards economic irrelevance.

Much of the debate over required pilot training hours is discussed under the guise of safety based on one truly unfortunate accident. At the time of the accident, the US air transportation system enjoyed a safety record that was the envy of the world and that record was realized under rules, standards and practices that had been in place for decades.

Organized pilot labor paints the pilot shortage as a pay issue. Despite dramatic increases in first year pay as an attempt to attract new airmen, profitable routes continue to be cut because there are too few pilots to fly the schedule envisioned by the airlines months before. At \$40-50 per barrel oil, the level of commercial air service to small communities with smaller regional aircraft would be much greater if only there were a sufficient number of pilots to fly the routes where financially viable demand exists.

The reliability of regional carrier flights would be much better if only there were sufficient crews to replace those that “timed out” for the day following the initiation of new rest rules. Again, no airport executive wants any part of an unsafe system. Rather, they are concerned about the viability of their community’s economic engine.

A FIX IS NEEDED

Increasing pilot employment rates is a significant issue if the promise of small community air service by government is to be upheld. RASA is pleased that the FAA shares our concern and we are eager for the Federal Government to help our airport industry realize its full potential. When this new hour requirement was introduced several years ago, the Government Accountability Office (GAO) assured Congress that the newly passed law would not create a shortage of pilots. Yet, we now have had the new hourly rule in place for almost three years, and the regional airlines are facing significant challenges in finding new pilots that meet their standards despite having dramatically increased wages.

The 1500 hour rule requires additional training time and a resultant financial burden for aspiring commercial pilots. This comes at precisely the time we are experiencing significant new demand for airmen due to mainline retirements in the US and worldwide aviation growth. The military is also facing significant challenges in maintaining an adequate pilot population to continue to meet their mission. It is critical that the Federal Government attempt to help address the issue of increasing the pilot population for the benefit of both commercial and military aviation.

COLGAN AIR FLIGHT 3407

One of the frustrations about this issue is the misunderstanding of the Colgan Air Flight 3407 tragedy is the training, hours and experience of airline flight crews. The National Transportation Safety Board (NTSB) concluded that the accident was the result of pilot error, but did not relate that to the hours of experience for the flight crew. Both flight crew members actually had more than 2000 hours of experience.

Of the 46 findings, 4 probable causes, and 28 recommendations from the NTSB, there was not one suggestion that raising the hourly requirement to become an airline pilot would have prevented this accident from happening. It seems that it would be most judicious to focus on the recommendations from the safety experts to prevent this from happening again. Even the current NTSB Chairman is on record opposing an hourly requirement as a way to ensure pilot safety. An increased hourly requirement that doesn’t relate to the accident IS creating a significant workforce impact on the industry with the downline impact being a loss of commercial air service in the nation’s smaller markets.

The experience of the regional airlines over the last two years is that airline pilot candidates need retraining before they can meet the skill set needed to fly their aircraft. Most commercial pilots

accumulate around 300 hours in a structured environment to attain their certificate, and then are left in an unstructured environment to attain the hours required before they can apply for a commercial airline position. For decades, international airlines, that fly to/from the US, have trained airmen in a structured environment that produces a safe and qualified pilot in a much shorter time span and with fewer hours than our prospective pilots face today.

CONCLUSION

RASA is not about making the system less safe. Rather it is a group that has come together to be very vocal regarding the unintended consequences of government policies that allowed a redraw of US airline industry architecture that favors larger markets at the expense of smaller markets despite promises to the contrary. Then the Federal Government exacerbated the problems confronting small community air service by adopting legislation that reduced the supply of pilots.

These policies stand in the way of keeping as many communities as possible on the global trading map and in turn relevant tomorrow. RASA agrees that pilot training must be based upon a qualitative, scenario-based and a highly structured program. Today's pilot shortage can be resolved through safety-first solutions that can be realized within today's regulations all the while promoting the safety of the system. However policy change to refill the pilot pipeline must be made post haste if we are to arrest the atrophy of the nation's commercial air service grid.

As the FAA and other branches of government examine ways to support small community air service and economic development, the airport community implores a comprehensive review of current policies, programs and laws governing air transport in place. We need to determine their effect on the small community air service segment of the economy. The Regional Air Service Alliance (RASA) stands ready to participate in this discussion.

On behalf of the Regional Air Service Alliance,

William S. Swelbar
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Cc: Senator Kirsten Gillibrand
Senator Cory Booker
Senator Robert Menendez
Senator Richard Blumenthal
Senator Robert Casey
Senator Dianne Feinstein
Senator Barbara Boxer