

Confidential Human Factors Incident Reporting Programme

FEEDBACK

Issue No: 39

July 1996

Editorial

In the last issue of FEEDBACK I advised you of the CHIRP Management Board's endorsement of the proposal to establish CHIRP as a company limited by guarantee.

Subsequent to the decision of the Board, the proposal has been approved by the Civil Aviation Authority Policy Committee and, on 2 July 1996, the Secretary of State's consent was granted for the Civil Aviation Authority to continue to fund CHIRP following its incorporation. In addition, the Charities Commission has determined that CHIRP's aims and objectives meet the Commissioners' requirements for CHIRP to be entered on the Register of Charities. The formal documentation is currently in preparation for the new organisation to be established as a company limited by guarantee with charitable status by 1 October 1996.

What affect will these changes have on the Programme? The principal benefits will be that the independence of CHIRP from the major interests of the air transport industry will be assured and a legal framework for the future funding of the Programme will be established. As far as you, the user groups, are concerned the Programme will operate as before, with the confidentiality of reporters remaining paramount, and CHIRP acting on your behalf to assist in the resolution of human factors problems and to raise the awareness of your colleagues on important human factors issues.

When formed as a charitable company CHIRP will operate under a Board of Trustees. The nominated Trustees have been selected to confirm the independence of CHIRP and are:

Air Cdre A N Nicholson	Commandant, RAF School of Aviation Medicine (Chairman)
Mr K Smart	Chief Inspector of Air Accidents, Air Accident Investigation Branch
Dr K Edgington	Chief Medical Officer, Civil Aviation Authority
Mr E B Trubshaw	Nominee, Society of British Aerospace Companies
Mr C Hodgkinson	Nominee, Guild of Air Pilots and Air Navigators
Mr M Burlyn	Nominee, Guild of Air Traffic Control Officers

The remaining members of the present CHIRP Management Board will, together with the nominated Trustees, form a CHIRP Advisory Board which will assist me in determining the best way that important concerns raised by yourselves are brought to the attention of relevant agencies.

Peter Tait

NOTE: In preparation for the new organisation the CHIRP contact telephone number has been changed to:
01252 370768

A Reminder on the magazine format:

The following type fonts are used for:

- Disidentified reports - printed with minimum text changes
- *CHIRP comments are italicised*
- Verbatim Third Party Responses are printed in SWISS type

Inside This Issue

1	FEEDBACK - Comments	P2
2	ATC Reports	P3
3	Flight Deck Reports	P6
4	More on Fatigue	P8

FEEDBACK - Comments

Transponder Code Selection

The following letter has been 'penned' after reading the report concerning inadvertent selection of 7700 instead of 7000 on a transponder (FEEDBACK Issue 38 Page 10). My specific specialisation is the HOST computer system.

Could I use your excellent journal to highlight an aspect of SSR code selection which I suspect is unappreciated by many pilots. The notes below describe the effect. I do not want to mention specific incidents - the reasons behind the problem can be human or technical but have the same effect on controllers. I must emphasise that normally everything works fine!

Flight plans are held in HOST in a pending state and produce appropriate warning strips to sectors before the flights' departure time. The code the flight will use is allocated at this time and is printed on the warning strip. The code and flight callsign are also passed to the Code Callsign Distribution System for radar display at LATCC and other connected ATC units.

Flights may be activated manually on receipt of the departure time or, in the case of the London and Manchester TMA airports, by the radar. This automatic activation process occurs approximately one minute after takeoff and is normally extremely reliable but is entirely dependant on the aircraft squawking the correct SSR code.

If a transponder is faulty or the wrong code is selected it is possible for another flight to be activated if the 'faulty' code matches another allocated to a flight from the same airport. There is no technical safeguard against this as obviously only one transponder is operational on the aircraft at a given time.

Various ATC procedures are provided to allow for this but all depend on a busy controller determining what is actually wrong in a timely manner. Please could all aircrew bear this in mind when selecting and checking SSR codes before takeoff, particularly in view of the very high traffic levels at some airports.

More on LOFT

I was pleased to read the views of another LOFT dissident (FEEDBACK Issue 38 Page 4). I was beginning to think that I was alone in believing that the value of LOFT is over-rated.

I have been flying professionally for 25 years and in that time I have had many actual emergencies. However I have never had two significant emergencies in one flight and I have never had two separate emergencies which subtly interact with each other. This, however, is almost the standard format of the Line Oriented Flying Tests (sic) in my company. The reason is understandable. Unless you have fault after fault after fault piled on, the four hours are largely wasted in pretending you're actually flying a normal trip. I expect that the multiple faults and subtle interactions also make it more interesting for the TIRE.

I would much prefer a few hours of emergency training, we would have a single fault, deal with it, practise handling in any associated abnormal configuration, discuss the performance implications and, if necessary, do it again to get it right. Then we would press the "FAULTS MASTER CLEAR" and move on to the next thing. There would be an opportunity to learn and remember. The way we do it now is too much like fire-fighting because it is just another career-stopping hoop to jump through - you remember very little except your excuses.

A Reflection on Interceptions

As I have reached the great age of 60, I have now retired from ATC duties with the CAA.

As a parting shot, I would like to make a comment on the statement made in Issue 37 by Group Captain Gooding.

While I have no doubt that RAF aircraft are not briefed or authorised to conduct practice intercept manoeuvres against civil air traffic, I can assure you that the practice of "coming in for a look-see" is far from unknown. It would be fair to say that quite a high proportion of my grey hairs, of which there are many, were caused by just such manoeuvres. It is very difficult for a controller to maintain standard (5 miles/1000ft) separation by attempting to turn a slow aircraft like an ATP away from a high-speed military machine which seems intent on coming as close as it dares.

I am thinking in particular of the portion of the Scottish FIR in the Aberdeen - St. Abbs - Newcastle area. This part of the FIR is quite heavily used by civil traffic and I am certain that almost all of the crews flying that route on a regular basis will have had encounters with military traffic which have caused the neck-hairs to elevate.

Anyway, that's all in the past now - for me! But I fear that the younger ATCOs who are now "running with the baton" will have to continue with the same problem into the foreseeable future.

ATC Reports

CHIRP Comment:

The item in FEEDBACK Issue 38 titled "ATC Operations and Training Standards" and the responses authored by Mr Keith Williams Director Air Traffic Operations NATS and Mr John Dancer Head of Inspection and Licensing ATS Standards Department CAA (SRG) have resulted in a significant number of reports and/or

comments being received on the same or related subjects.

In considering how best to progress this issue, I am aware that there have been occasions in the past when CHIRP's effectiveness in assisting in the investigation and resolution of some of the more sensitive issues raised by reporters has been limited by a preconception of an anti-management bias.

In order that the important issues raised on this subject are given due consideration by the respective management agencies, I have decided not to print in this issue much of the material received, but to discuss the principal concerns that have been detailed by reporters with senior managers in NATS and CAA (SRG) in the coming weeks and to provide a progress report in the next issue of FEEDBACK.

The following report summaries are indicative of the range of views.

Operations/Training staff

Recent articles in CHIRP regarding the ability of Operations/Training staff to maintain validations at units highlighted an area of great concern to most ATCOs at this Unit.

The unit provides a number of Air Traffic services and ATCO's are permitted to be valid in two disciplines. This may not seem much until you consider that an ATCO has to be competent in both 'Radar' and 'Co-ordinator' roles, in not one or two sectors, but in a number of different operational positions that can exceed ten.

It is in no way an effort to doubt or belittle the abilities of staff in Operations/Training, but at peak times when they want to be plugged-in to "keep their hand in" there is no doubt about it - they are simply not up to speed and delays and backlogs inevitably occur.

Picture the scenario when members of Operations/Training were acting as Radar Controller and Number One Director.

Traffic was steady but not unduly busy, we had a fair stream of inbounds all well spaced in-trail. In these traffic conditions a written procedure permits inbound aircraft to be descended to their stack level and to be transferred on a heading, rather than proceeding to the hold. When this procedure was proposed to the Radar Controller, the response was "Oh, I didn't know we could do that..." The individual appeared to be genuinely unaware of the procedure.

As the arriving aircraft would beat the impending busy period if vectored, Number One Director was asked if he would accept the aircraft on headings His response was "No, it's going to get busy in a minute, so all of them to *** (*holding point*) please..."

Consequently, through two fully valid controllers' lack of speed and unfamiliarity with procedures, three aircraft spent over 15 minutes more in the air than they needed to be. The approach man didn't want to split it because he wanted the traffic for practice.

It seems profoundly wrong that such people can simply plug in as and when they feel the need, often at the busiest times of day. Can it really be considered safe that after a number of years in Operations/Training, doing a couple of hours here and there, such people can return directly to an operational environment FULLY valid with NO re-training? Yet at the merest hint of an incident a full time operational ATCO is suspended and may be subject to 20 hours or more re-training.

Does SRG really approve of such practice?

Mr Williams, we all read your response to the previous correspondent, and you

wrote what we expected, quite rightly, to see.

However, at the bottom of the pyramid, at the grass roots level, the fact remains that ATCOs are seriously concerned about the ability of Operations/Training staff to maintain validations adequately and to operate up to speed.

One hopes it won't require an MOR for 'appropriate CAA personnel action' to take place.

Controller Training.

(1)

Having read your latest publication I do feel that I must respond to the article "ATC Operations and Training Standards" although to steal a phrase I don't wish to play 'ping pong'.

I have been employed by the CAA [NATS] for the past 27 years and for the most part at Heathrow. During my time there I, like all my colleagues, was constantly checked for competency. Some ten years ago I was appointed to Air Traffic Operations at the same airport and during that time, as well as my 'office job' I was required to maintain my currency in both Tower and Approach Control and my competency was equally monitored during that time.

In the recent past I applied and was accepted for a position as an Instructor at the College of Air Traffic Control at Bournemouth, I must admit that I was surprised at the intensity of the selection process and the following training which only confirms the reason why our College is revered throughout the world.

If a low success rate is the yardstick by which our training efficiency is measured, then I must point out that most major industries have a similar failure rate and if

I can state a statistic from my first career in the Merchant Navy working for a major oil company, out of a class of 24, only two made it. This is the price of excellence and although one could argue the cost effect nobody can argue about the standard of Air Traffic Control in this country.

From purely my own experience I have the greatest respect for my colleagues at the College, the competency examiners throughout the country and for the Director of Air Traffic Operations. The day that he turns a blind eye to safety in Air Traffic Control is the day that I resign and travel by boat.

(2)

Despite the predictable response by Mr Williams I can confirm that amongst operational controllers it is a common belief that there has been a deterioration in the training given at the CATC Bournemouth in recent years, which becomes most apparent after the trainees arrive at their operational units. It is further believed that a combination of poor selection and training when overlaid by a short-sighted cost cutting training policy has placed an ever increasing burden on the already overloaded OJTIS, (On-the-Job Training Instructors) at the operational units.

Of course not all Instructors are below par, many are dedicated professionals who share the same doubts about the motivation of some of the younger ATCO's who have 'opted out' to instruct, and who also wonder how such reliance can be placed on the many time servers or retired ATCO's that for a variety of reasons find themselves a sinecure at the College.

Yet again one might point the finger at the minimal knowledge of on-line civil operational experience of those making the appointments.

An Unwelcome Competitor

The airfield is privately operated, CAA licensed and is PPR.

The airport was closed over the weekend in question for a competition involving powered flying model aircraft. The event had been pre-notified by NOTAM.

A full programme of model flying was underway including radio controlled, aerobatic flying and line flying centred on the Apron, when a light aircraft (AA-5) arrived without warning and landed causing severe disruption and creating a flight safety hazard. After a short discussion with the pilot, the aircraft departed to return to his home base.

The pilot seemed oblivious to the dangers of flying through model aircraft, some of which were operating at speeds in excess of 100 knots.

A simple and obvious moral but one that we forget at our peril - Don't assume, check.

Moreover, if the situation doesn't look and feel right, it probably isn't!

What I Said Was.....

Radar controller phoned with a radar handover on Aircraft; on its own navigation to '***', FL70. I acknowledged the handover with the words "identified".

Aircraft called on frequency and reported descending to FL50. Immediately queried his cleared level and he confirmed FL50. I telephoned controller to query this and he claimed that on the handover I had said "down to five", this was a complete misreading of the word "identified"!

Had the aircraft descended a little faster to this erroneous level it would have been below CAS (*Controlled Airspace*), below safe terrain level and below radar cover in an area of lots of hills and much VFR flying.

Fortuitously the aircraft's rate of descent mitigated the potential of this error, and it

stayed inside CAS and radar cover without running out of terrain clearance.

Flight Deck Reports

Silence is Golden,..... or is it?

Bank Holiday weekend. Tower is operating an AFIS for private flying. Very quiet towards the end of the afternoon. Routing back from a routine task. No reply to my RT call so assume airfield now shut. Position for a downwind turn, flare and quickstep to the out of hours re-fuel pump.

During refuel crewmember notes "There is somebody in the tower after all" so I try another radio check. No reply. But when re-fuelling is complete and crew is back on board we get a flashing green from the tower! Re-position to the trolley and shut down.

Get out of aircraft to see bowser drive off to re-fuel a Citation that has just landed! Slow dawning realisation that maybe the radio is u/s. Got on to the phone to ATC to apologise about the radios "You gave us a bit of a surprise!" Tried more radio checks ... Box 2 OK but Box 1 not working.

Combination of no reply on RT and the time of day when ATC normally shuts led to assumption that airfield was now closed. Five minutes later and we would have conflicted with the Citation.

Further investigation found the cause of the problem ... me! While returning the standby frequency to its normal setting I managed to wind the volume down to zero (clockwise turning of the FREQUENCY selector knobs with flying gloves snagging the VOLUME knob turning it counter-clockwise), but there was no need to check the VOLUME setting as the airfield was closed and that's why it was so quiet, wasn't it?

Next day almost the same thing happened. Hovering on a task with lots

of radio chatter on the tower frequency plus other frequencies. This time I turned it down deliberately on the Station Box. On the way back in no reply to RT call but bearing in mind yesterday I tried on box 2. But box 2 is normally used to get the ATIS on start and then turned down! No reply on either box so ... airfield closed, yes?

Coming over southern boundary towards the pad, a green light from the tower. Instant penny drop and turned up the volumes to apologise yet again to ATC "we thought you weren't talking to us, was it something we said?"

Not totally at home in aircraft due to flying both fixed wing and rotary types, with each aircraft in the respective fleets being configured slightly differently.

Happy ending from the tower "at least we got to check the light gun!" And from now I will be checking VOLUME controls!

Excuse Me, May I.....

During take off roll at high weight therefore higher than usual speed, the Tower Frequency was in non-stop use with a social conversation between another taxiing aircraft and the Tower Controller about the ownership of a aircraft parked on the ramp. The conversation was about who owned the aircraft, what the company did etc.

We had a MASTER CAUTION come on during the take off roll and this added to our workload on this performance-limited take off. We did not need the distraction of constant non-operational talk on the R/T as well. If we had wanted to declare an emergency, or had abandoned the take off, we could not have got a word in on the R/T. The R/T was still in constant use after we had taken off.

The report details an early morning departure from a UK airfield, at which time a common Tower/Ground frequency was in use.

The only justification for adopting single R/T frequency operations during periods of low utilisation is that operational efficiency and safety should not be compromised.

A lack of R/T discipline such as that described is unacceptable when single frequency operations are being undertaken, and highly undesirable at any time as many ground emergencies are notified on the Ground Frequency.

The ground agency has been notified of this deficiency, using disidentified information.

Who is in control?

The flight was a navigational detail to a destination airfield with a second active airfield located approximately 11 nm SW of the destination. We had obtained a radar service inbound and requested to change to the approach frequency of the adjacent airfield. This was approved and on subsequent contact I was informed of jet traffic in the hold at 2500'. As we passed the airfield we became visual with the traffic which was still in the hold. I then requested a frequency change to destination approach frequency. This was approved and we advised destination approach that we were "5nm south to join". We were cleared to route to a position 2nm south of the destination airfield, VFR, not above 1500' on the QNH, and to report visual with the field. Prior to reaching the position, I reported visual with the field and was told to transfer to tower frequency. After transfer I glanced over my shoulder and saw an aircraft (later identified as the jet traffic previously noted) in our six o'clock at the same altitude with its landing lights on. I immediately initiated a descent to 1000' just as tower informed me of a contact in my three o'clock. I replied that the contact was in fact in our six o'clock; the controller then told me that the reason for the delay in informing me was because he was talking to the other airfield ATC on a landline, who was

in the process of advising him that the jet traffic was outbound in the NDB instrument procedure for the other airfield (the outbound leg of the procedure extended to within approximately two nm of the destination airfield).

On landing I spoke to both ATC units who both put the confliction down to a delayed communication. From my perspective the primary reason for the 'conflict' was that while the other aircraft was complying with an IFR clearance issued by the other airfield and myself with a VFR clearance issued by destination airfield, the two aircraft were allowed to operate in the same airspace, both legally at the same altitude but talking to two separate controllers in two separate ATC units. Surely a recipe for disaster!

NDBs - Removal from Service

(1)

The operation in which I am involved requires a lot of night approaches to be flown. It is with great concern that I note that a number of UK airfields are permanently withdrawing the Non Directional Beacons (NDBs) that used to service the approach patterns to their parent airfields e.g. 'STN' and 'MAN' - there may be more by now.

As is well known, the NDB at the Outer Marker is one of the best pilot interpreted aids to checking the validity of the centre line, when apparently "established on the localiser". Even in this day and age fake localisers exist (two of the four runways at Cologne are known to be affected this way) and recently CAA sent out a Circular highlighting this very problem and the need for pilots to cross-check.

Fortunately at Cologne the German authorities have had the sense to leave the NDBs in situ - might not pressure be brought to bear on the BAA/NATS to re-install the removed beacons before

someone “lines up” incorrectly and an incident ensues.

(2)

I write to express my dismay that commercial considerations have led to the removal of the NDB ‘SAN’ at Stansted airport, without its replacement with any other facility such as an NDB on the field.

To take a cynical view, this course of action seems to be at odds with NATS spending a small fortune building probably the highest obstruction in Essex - the top of which is in cloud in even CAT 1 weather conditions - and placing it adjacent to the runway for use as a control tower, whilst at the same time, removing the only pilot interpreted means of ensuring that we do not strike the then invisible concrete folly by having captured one of the false localisers, the dangers of which one is so often warned to avoid, by making use of aids such as on-field NDBs.

Equally other major benefits such as positional assistance in visual conditions, closing angle guidance and associated ease of speed and height adjustment when engaged on vectored or procedural approaches, or the facility to fly an alternative regularly practised pilot interpreted approach when the ILS is unserviceable would seem to outweigh the relatively minuscule (sic) cost of providing a short range beacon on the field.

Indeed, if NATS ‘bottom line’ is so very crucial, perhaps their accountants should consider that, once installed, we could all step back only a few years and use such a beacon to replace that expensive ILS/DME they have been saddled with!

Overall, it does seem a pity that a portion of the cost of the folly was not saved by arranging for the excellent controllers to sit just a little lower (and thus spend less of their time in IMC along with those they are providing a service for), enabling

funds to be released for the purpose alluded to above!

Your views on the matter, and hopefully your support for the reinstatement of the facility would be gratefully received.

A request has been made to NATS Navigation Services to ascertain the process by which a decision is made to remove an airfield NDB. Support for the above views will be forwarded to NATS after disidentification, to assist them in their deliberations. Progress on this matter will be reported in the next issue.

More on Fatigue

We continue to receive a significant number of reports describing incidents attributed to the effects of cumulative fatigue, or citing rostered duty periods as a potential cause of fatigue related occurrences.

The following reports detail the difficulty in gaining sufficient rest that some flight crew experience when operating duty patterns that are permitted within the current FTLs.

Intensive Night Cargo Operations

I write to lend support to the argument that present and proposed FTL schemes do not adequately protect crews from the especially high levels of cumulative fatigue experienced during this type of relatively recent operation.

Some particular problems are those of continually trying to sleep at the ‘wrong time’, during short daylight rest periods, the inability to achieve adequate sleep before the first, invariably long, night of a pattern, due to having slept through the previous night.

Most important by far, however, is the small number of days off specified in CAP 371. Exactly the same as for a day operation, when crew either sleep in a quiet hotel at the right time, or most likely at home. No account is taken in the legislation in this area of the

necessarily long blocks away from home (on par with very long haul, without the common benefit of long slippage periods free of duty) or the time taken when at home to recover properly from the cumulative effects of the preceding duty.

Having flown identical aircraft on identical routes during supposedly more 'stressful' intensive daytime passenger operations, I can assure you that I have never, in common with my colleagues, suffered such continuously grinding fatigue which required invariably longer than the two or sometimes one day at home granted for recovery.

The Operators need to remain competitive, and thus will not, in my opinion, accept or address this problem without regulation to ensure a level playing field. It is my real hope that a serious incident is not the instigator of a change in this highly profitable area of aviation.

Transatlantic

(1)

I have been flying long haul for approximately 15 years, and have never felt so tired as I do working my present roster, which has been consistent for the last 12 months. The constant three-day transatlantic trips with two days off in-between are totally fatiguing. I have now come to the stage of having cat-naps of half to one hour on the West-bound portion, as well as the night sector back!

The company also class Vancouver and Seattle as not being on the west coast of the USA; - consequently, we are required to have only 25 hours off before the homeward journey, and not the two local nights as required for San Francisco, flying to which takes not much longer.

This situation, where the crews are so fatigued, is an incident (at least!) waiting to happen.

(2)

I am getting very concerned by the levels of tiredness leading to fatigue problems. In this particular incident, I had four days off prior to operating the day flight from the UK to USA. However, my two colleagues had only twenty four hours off from their previous flights, which were also back from the USA on night flights.

We arrived at our US destination, after approximately a nine hour flight, took about 24 hours off, and then operated the night flight from USA to UK, about eight and a quarter hours flying time. Mid-Atlantic, about 4a.m. I turned to pass a fuel check to the non-operating pilot, and it was then I noticed that both my colleagues were asleep in their seats.

I believe the root cause in incidents like this is the company's continual drive for more profits. They constantly bargain down the hotels we stay in, so we quite often get the noisier rooms, or cheaper hotels.

We nearly always operate daylight flights from base, 24 hours off, then nearly always a night flight back to base. This constant changing of shift patterns, coupled with the difficulty in changing from daytime working to night-time working with only twenty four hours in-between, leads to problems getting adequate rest pre-flight.

It is difficult to produce a compelling argument that roster patterns are primarily responsible for the reports of fatigue, without more detailed evidence on individual sleep patterns than is normally made available in reports submitted to CHIRP. Fatigue, as with other factors such as stress, is influenced by a large number of factors, many of which relate to the individual.

Consequently it is perhaps understandable that the Authority and airline managements are reluctant to base a decision to review and/or modify present

schedule arrangements on the limited evidence that is often made available.

Notwithstanding this situation, reports such as those reproduced above are a matter of concern. This subject has been discussed by the CHIRP Management Board and, following an investigation into the methods previously used to assess aircrew fatigue, CHIRP has consulted an independent specialist on the subject of Sleep Patterns/Fatigue. To provide substantive information on the cumulative effects of fatigue, details on actual duty periods over a calendar period of a minimum of three weeks, are required. Of equal importance is the time of day the duty period started/ended and the location/time zone in which rest periods are taken.

Information provided for analysis will be dis-identified and evaluated on a confidential basis as an independent assessment of cumulative fatigue.

More Pressure

I'm a "can-do" sort of chap. I like to think most of us pilots are - but there are limits.

The task: two days of aerial work. I was being supervised by a member of the Company, to allow me to gain experience in the task.

The problems: The task turned out to be twice as big as we had been told by Operations (what a surprise!). Instant commercial pressure, combined with difficult weather conditions. The net cumulative result was the old chestnut of Duty Hours.

The pressure to bust the limits from the supervisor was not even implied - it was just taken for granted!

Our Company has had previous problems with FTL exceedances (sic). Yet it is still happening, and seems to be encouraged. A case of what the CAA don't see, the Company doesn't have to worry about?

My dilemma: Do I put the truth on my FTL record and drop myself in it with both the CAA and my Company, or do I just lie as I am obviously expected to?

Maximum Crew Duty Limits

The stated maximum crew duty limits are 55 hours per week. The Company define a week as starting 0001 hrs Sunday for seven days.

My roster had a seven day block of work starting Saturday and required over 56 hours duty in that period.

I fail to see that just because work starts on a Saturday that it becomes legal to be rostered to this level of duty which, if it started a day later would be illegal due to crew fatigue-related legislation. Surely the limits should be applied on a rolling seven day basis as are other limits (e.g. 28 day flying hours etc.).

CAP 371 permits an airline management to specify the time and day on which the seven day consecutive period is to be based. (Page 7, Section B, Para 21 and Page 32 Annex 'A' Para 5.23). Providing that thereafter this period is used consistently in rostering and calculation of duty hours, the process would be deemed to be in compliance with CAP 371.

The type of problem described is covered to some extent by the limitation on cumulative duty hours detailed on Page 16 Para 22.1 which progressively reduces the maximum permitted duty hours as a means of protection against the onset of cumulative fatigue:

55 hours in one week (may be increased to 60)

95 hours in any two consecutive weeks

190 hours in any four consecutive weeks

The CAA Flight Operations Inspectorate have taken an interest in cases where they have deemed that operators have not interpreted CAP 371 in an appropriate manner. The Authority's concern on this issue is reflected

in Notice to AOC Holders No 6/94 (replacing NTAOCH 7/91). The NTAOCH provides additional guidance on aspects of the CAP which have been assessed to be the subject of an over liberal interpretation. If you are not aware of this document, it clarifies a number of sensitive areas of the CAP.

A Different Approach to FTLs!

You might find the following interesting - if it were not true it would also be amusing !

I recently flew with a pilot, who told me he used to fly a long haul aircraft on a freelance basis for a non UK operator, who was not unknown for registering aircraft in states not recognised for their rigorous policing of Flight Time Limitations or maintenance schedules.

It seems our man was called one day, to transit between two airfields within Europe, position the aircraft to Central America, then operate a passenger flight to Asia with two transit stops in between.

Not unreasonable, you might say, except that this was done as one continuous duty period involving some 45 hours flying and over 60 hours duty!

And we think we have problems with Commanders Discretion or JAA FTLs!

On Equal Terms?

(1)

Wx - Fog offshore, extending one and a half miles onshore. Operating from coastal airfield (quarter of a mile inland) on easterly runway. Airfield shared with a competing offshore operator. On departure went IMC at CDP, on top at 400'. Before we changed frequency we heard one of our competitor's aircraft on approach report visual, and then land. Two minutes later one of our aircraft fails to get in and diverts.

We return from our rotation one hour later, WX the same, so we expect to divert. We are first (other two are competitors aircraft) we fly approach to minima, see nothing not even a glimmer - go around. Behind us second aircraft reports visual and lands. Third aircraft reports visual and lands. Amazing !! We have stacks of fuel to elect to have another go. We get to MDH at minimum IMC speed. Again nothing seen. Airfield is 'clamped'. We follow our colleagues to our nominated diversion.

Perhaps our rivals could supply us with a copy of their approach plate.

(2)

Upon tuning 'Shanwick' for oceanic clearance we heard a long conversation by an aircraft apparently a UK operator, but obviously crewed by Russians with a very poor command of English.

They requested Track 'E', and were issued Track 'F'. This was haggled over, but finally accepted. However, when the ATC controller asked for a readback of the track they admitted that they did not carry any track information. The controller read out the track co-ordinates but the crew took three attempts to read them back correctly.

When you enquire from the CAA what steps they will take over this matter, they will tell you they can not/or will not control 'flagged-out operations', yet simultaneously insists that my employer maintains the highest standards.

Why should other operators be allowed to operate with dangerously low standards purely because they have flagged out their operations to foreign airlines?

The playing field is not level, in fact it is tilting dangerously!

Too Eager To Please ?

Cruising northbound at FL350 under procedural control in Greek airspace,

ATC suddenly say "There is an A310 40nm DME LMO at FL330. Are you happy for him to climb through your level?"

We say "Negative, we are 40nm DME to the south of LMO"

ATC say "Yes, yes he is 40 DME north of LMO. Are you happy?"

By this time we are 30 DME south of LMO

We say "Negative". End of incident. We watch A310 pass under us shortly after.

I know that air traffic controllers in this area work hard using poor equipment and not much pay, but why do they continually ask pilots if they are willing to break the rules, in order to get climb or descent? My concern is that some pilot sleepier than I will give permission to something that he shouldn't and then do some formation flying - or worse.

Either the rules and the radar are in place or they are not. Controllers should not ask pilots for permission which pilots cannot give.

A Lesson Learned Many Times Over

- Starter Motor was not working.
- Decided to start engine by hand-swinging the propeller.
- Aircraft was not fitted with Parking Brake and no chocks were in position.
- The Throttle was opened to draw in Fuel.
- On starting the Aircraft lurched forward towards the Fuel Bay from which it had just been pushed back.
- The Pilot pushed forward on one wing and the Aircraft turned across the Taxiway coming to rest on its nose beside the taxiway.

Fortunately only the pilot's pride was damaged, and his chequebook dented.

It is sobering to reflect that this incident could easily have resulted in a Coroner's Inquest and not a CHIRP report.

Never start a propeller without the aircraft being chocked/secured. This lesson has been learned many times before and not always with a happy outcome.
