

# FEEDBACK

Issue No: 64

October 2002

## EDITORIAL

### UPDATE ON REPORTING OF CONTAMINATED RUNWAYS

In the April 2002 issue of FEEDBACK we published an ATC report regarding the current procedure for reporting contaminated runway states to landing aircraft.

The report was passed to CAA (SRG). In response to the concern expressed, CAA (SRG) is conducting a review of the current advice to ATCOs in relation to recent research on this subject that has been conducted in Europe, USA and Canada. However, no change in the current advice is anticipated for this winter.

In the absence of ATC reports to landing aircraft, pilot reports of braking action might be of benefit to subsequent landing aircraft in some cases.

### AIRPORT SECURITY

New requirements for airport passes are under consideration and will, in due course, be issued by the Department for Transport (DfT); it is anticipated that this will standardise the format of such passes for all airports. However, there seems little likelihood of much alleviation from the ongoing problems experienced by Flight Crew and Engineers in negotiating airport security when on their legitimate business, examples of which have been reported in previous issues of FEEDBACK.

As a result of the recent, well-publicised, criminal activity at a major UK airport, more stringent checks on all pass holders have been introduced. Notwithstanding this change, it appears airports are still not accepting each others passes and the need for multiple passes, by engineers working away from base for example, seems set to continue. In the longer term it may be that biometric passes will become freely available with their potentially intrinsic improved security. It is possible that when this occurs, estimated in two to three years time, airports may reconsider their stance on accepting others passes.

Sir John Wheeler is conducting an Airport Police/Security Review that would appear to have a fairly wide remit. One of the topics discussed has been the costs associated with visiting engineers complying with security requirements.

In this context the consequential costs of aircraft delays are also relevant. If your company has any such data or standard costings that are relevant we can arrange to pass on the information.

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## CABIN CREW REPORTS

*We have received a number of cabin crew reports on matters that are also relevant to flight crew. These concern flight deck/cabin communications, cabin crew duties during positioning flights and the extension of Cabin Crew Duty Periods following a delay/cancellation:*

### FLIGHT DECK/CABIN COMMUNICATIONS

(1)

There seems to be inconsistency amongst flight deck crews regarding when, and when not, to contact them.

In my Company, the SOPs state that telephone contact be at 20-minute intervals. Some flight crew, especially on long haul routes, do not wish to be disturbed at all on night sectors. Other flight crew complain we are now telephoning too often.

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(2)

This two-man flight crew did not want cabin crew telephoning the flight deck every twenty minutes, which is what our procedures are, to ensure the safety of flight crew, as well as to offer drinks etc, and so told the cabin crew they would phone them in the galley as and when they wanted anything. I explained this was not the Company procedure and asked why the change? I was

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If you receive FEEDBACK as a licensed pilot/ATCO/maintenance engineer or medical examiner you will need to notify the relevant department of the CAA of your change of address and not CHIRP, details as follows - [ATCO/FC/ENG Licensing Department], CAA (SRG), Aviation House, Gatwick Airport South, West Sussex RH6 0YR

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told that if one of them was dozing/having some rest in their seat the telephone would disturb them. The frequency of calls from flight crew sometimes went as long as two hours without any word between cabin crew and flight crew.

**Regular checks, as described, are required to ensure that at least one flight crew member remains fit and alert.**

**Company procedures relating to cabin crew and flight crew communication should be provided to include all types of sectors, i.e. long haul, short haul, day, night and should reflect the increased use of interphone between the cabin and the flight deck that is now necessary.**

**Company procedures agreed with CAA (SRG) and published in the Operations Manual must be adhered to and should not be changed without Operations Manual amendment.**

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**POSITIONING/DEADHEADING FLIGHTS**

Crew "positioned" aircraft from AAA (UK1) to BBB (UK2). Due to the aircraft type, doors must be armed, so crew armed/disarmed the doors, sat by exits etc, and additionally "looked after" flight crew on this ferry sector.

That evening we were required to operate BBB (UK2) - CCC (Med) - BBB (UK2); this was outside our maximum duty for three sectors. However, Crewing argued that we would only do two sectors, as the first positioning flight did not count. As far as I am aware this is wrong and the first sector does count. Management have subsequently also "confirmed" that we only operated two sectors!

In order to be classed as 'positioning/deadheading', the cabin crew would have to be passengers on the flight, that is to say they must not have been required to carry out any safety- or service-related duties, which would be carried out by a member of the operating crew.

Positioning sectors are not counted and the time spent is accountable as 'duty' but not as 'flying duty'. However, if subsequently cabin crew operate one or more sectors within the same 'flying duty period', then their flying duty time will be counted from when they first reported for positioning.

If on a particular sector the only passengers are employees of the company and there is no freight other than 'company' freight, then the flight is non-revenue. In this case, there is no requirement that cabin crew must be carried to undertake safety-related duties. In practice, in the absence of cabin crew, flight crew undertake door arming and disarming duties, and carry out safety briefings.

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**DISCRETION**

I feel compelled to bring to your attention events experienced during a recent duty. I would ask you to bear in mind that my understanding of regulatory procedures and restrictions is limited.

I checked in for a long-haul flight at 1330 local time. We boarded all passengers as normal, and took off shortly after 1530. Approximately two hours into the flight, we were advised by the In Charge, that we were returning to the departure airfield due to a technical fault.

The Captain made a 'PA' to the passengers advising them of the situation and we turned back. No emergency

procedure was instigated, and we continued to serve and finish the meal service.

We landed soon after 2000 and it was decided that the time elapsed in our duty was such that we would be replaced by another crew. We waited in the departure lounge. This is where the confusion started.

I was not told personally but 'the word' was that, as we had already completed nearly eight hours duty, a decision would be made as to whether our flight would operate. If it did, the replacement crew would operate the flight. If it was cancelled, we would be stood down.

The next thing we knew, we were being taken to another aircraft, and we had to operate a different, slightly shorter flight, which had been delayed. We were then sent on various 'guilt trips,' including "No crew on standby", "It's legal to operate", and "There are no hotel rooms available for these passengers".

On boarding, the In Charge made us aware that three of the designated crew had elected not to operate the duty, clearly having been given a choice. Had I been asked, I would have made the same decision. With all passengers boarded, two replacement crewmembers arrived at the aircraft, and the door was closed approximately 2200. Up until this time, we had not had any formal meal break, only managing to 'pick' at items of food between duties.

The flight was extremely busy, this on top of having to go through the stressful experience of an emergency landing on the previous flight and also coping with frustrated and anxious passengers.

We were allocated 1hr 25mins in crew rest, but the flight was so busy that this amounted to a little over an hour's actual rest.

We landed at approximately 0500 UK time, and finally arrived at the hotel at approximately 0630 UK time. This event amounted to an extensive and excessive duty with minimum rest.

***For the flight sequence described, the maximum allowable Cabin Crew FDP permitted by CAP 371 - The Avoidance of Fatigue in Aircrews is 13¼ hours (CAP 371 Table A, plus one hour). However, the maximum FDP could have been extended by use of Commander's Discretion by up to three hours.***

***Before exercising Discretion, a Commander is required to take note of the circumstances of the cabin crew and other members of the flight deck crew. If the Commander did exercise Discretion, taking due account of the cabin crew, the commonsense approach would have been for all of the operating crew to be informed of the situation. This would not appear to have been the case.***

## ATC REPORTS

ATC Reports received in Period: 3

Key Areas:



### BACKGROUND INFORMATION

Within the London Area Control Centre (LACC), Sector AAA has responsibility for aircraft operating between FL215-275 within the geographical limits of the sector. Aircraft departing the London TMA (LTMA) (*excluding LGW*) are transferred climbing to FL190 and are then released for further climb subject to known traffic. (*Aircraft departing LGW are transferred at or climbing to FL210*).

Due to the nature of the equipment at LACC only traffic planned to enter Sector AAA is shown as foreground information on Sector AAA's display, unless another aircraft has entered the geographical limits of the sector, in which case it then shows as a 'Rogue Sector Entry'. The problem is that the airspace and equipment is configured to show traffic as 'Rogue Sector Entries' only at FL215 and above, therefore, any traffic at FL200 or FL210 that has entered in error is not highlighted and is only shown as a background track; this is virtually invisible compared to foreground information, particularly when busy.

There have been multiple occasions when aircraft departing LGW that would normally have worked Sector AAA have been level capped at FL180, but are then inadvertently climbed by *London Terminal Control Centre (LTCC)* on the normal standing agreement to FL210. As they are not planned to work sector AAA and are still below FL215, they only show as background tracks. LTCC, having already made the error without correction, now believes this to be KNOWN TRAFFIC to the Sector AAA controller and transfers other LTMA outbounds on the normal standing agreement climbing to FL190.

The danger is created when the departing aircraft at FL210 do not check in on frequency quickly or in the worst case experience a radio failure. These aircraft are completely unknown to Sector AAA and appear only as background tracks on Sector AAA's radar display. Consequently the Sector AAA controller may climb other aircraft through this level without being aware of the danger of collision. There have been numerous

Occurrence Reports submitted on this but the urgent action that is required has still not been taken six months after first being made aware.

The solution would appear to be simple. If the lower limit of the 'volume of interest' for Sector AAA were to be lowered to FL195, aircraft at FL200 and FL210 would be shown as a 'Rogue Sector Entry', and would easily be seen. This would have no implications for any other Sector. The scenario described above has happened to me but fortunately the 'rogue' aircraft has called on frequency and the danger has been averted once the aircraft's position has been ascertained.

There remains a real risk of a potentially serious incident in this very busy piece of airspace unless something is done to improve the current set-up of the equipment.

***On bringing the reporter's concern to the attention of NATS and CAA (SRG), it became apparent that although a technical solution to the problem reported in earlier Occurrence Reports had been identified and was currently being tested, the reporters had not been apprised of this. NATS is considering how feedback might be improved.***

***CAA (SRG) has advised that the number of MORs precludes an individual response to reporters. However, reporters may contact the CAA (SRG) Safety Investigations & Data Department (Tel No: 01293 573220) to ascertain the status of a particular MOR.***

***With regard to the problem itself, a software change has now been identified to increase the volume of interest, as suggested. This is to be implemented in the near future.***

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### UNREASONABLE SECURITY?

***Following the review of airport security measures last year, we have received a number of reports regarding the variations in the application of security measures at UK airports and the selective manner with which some of the new measures are being applied. To date, attempts to highlight some of these problems at both a local and a National level have met with little apparent success.***

As a Watch Manager, amongst other tasks, I am expected to look after the well being of my staff and that includes keeping the task as stress free as possible.

A great deal of stress is caused at AAA (*UK Regional Airport*) by the stringent security checks we are subjected to on arrival at the 'gate'.

Up until recently we had to pass through the metal detector and have our 'baggage' checked but, provided we did not activate the metal detector, we were not frisked because we had locally issued ID cards. This has now

changed to random frisks, which, to be quite honest, are verging on an assault.

According to the Airport Authority it is because the access to ATC is airside and DETR (*now DfT*) insists upon the checks. What we are interested in is why then:

- a) Airport fire staff are not searched (their station is in a non-restricted area but they frequently cross to the restricted apron area.
- b) Vehicles, and their crews, crossing to and from the apron area and then returning are not searched.
- c) Security guards patrolling the perimeter fence do so singly manned and criss-cross from one side to the other.

One of our female members had nail scissors in her handbag and was told not to bring them into work again. Had a security supervisor been present, they would have been confiscated.

I have tried talking to DETR inspectors but they are not prepared to listen. The access to ATC is at least 400m from the aircraft apron; to get there we would have to use one of the official vehicles and this has to be approved by the Watch Manager.

We ALL realise the importance of security, knowing a person is the best form, but for some reason that is not enough for the Airport Authority/DETR and it is causing my staff and me unnecessary stress before we start our shift.

***As the reporter notes, the requirement for security is unquestionable. In an ideal world the response should be proportional to the threat, but we don't live in an ideal world and the threat can vary from time to time. It is a fact of life that checks are going to be made and thus it is important to stay calm and not become agitated.***

***However, it is equally important that Security Staff recognise that they provide a service to airline/airport staff and passengers. Security Managers should ensure that their staff exercise commonsense and courtesy in delivering this service.***

## FLIGHT CREW REPORTS

Flight Crew Reports received in Period: 31

Key Areas:

## WINTER OPERATIONS

*Winter operations give rise to additional pressures being placed on crews to meet schedules and minimise delays in inclement weather conditions.*

*There is some evidence from a number of reports received during last winter to suggest that some pilots succumb to the temptation to take a short cut.*

### (1)

I was not present at either of the two events but received reports from persons who were on board - both concern me.

1. After loading the fuel for a return flight to UK, a sudden snowfall causes the runway to become contaminated. The twinjet type is not now capable of becoming airborne using the correct performance penalty for slush unless it leaves a significant number of passengers behind. Despite the First Officer's protest, the Captain insists that a 15-degree flap departure will be 'OK'. Apart from snow/slush considerations, had the Captain considered the 15-degree flap climb limit (WAT limit)? - engine failure could have been a serious problem. Not a British registered aircraft, but operating to UK.
2. Another operator returning to UK; positioning crew from my airline on board who note snow and other contamination falling on wing prior to departure. Aircraft taxis away, positioning crew expecting aircraft to visit remote de-icing facility. Before time to assess situation, the aircraft (*a twinjet*) is on take-off roll, thankfully without further problems.

My fears are that commercial pressures are overriding crews' knowledge of safe de-/anti-icing procedures on critical *twinjet* airframes

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### (2)

After operating down route out of AAA (Europe) for a few days, the rest of the crew and I were positioning back to the UK as passengers on another airline. There was a short delay announced to the flight in the Terminal caused by the clearance of ice and snow from the runway. We spent approximately 15 minutes on board the aircraft in light snow before pushing back. At no time during that period did I see anyone make an inspection of the wing surface. The temperature had been consistently below zero throughout the few days we had been operating there and though I did not see a thermometer that morning I can be sure that it was below zero.

I was seated about one row aft of the leading edge and was in a good position to observe the slow build-up of snow and slush on the wing.

When we started to move without being de-/anti-iced I was rather concerned. It then occurred to me that there was a remote de-icing rig drawn on the Jeppesen Plates and perhaps this was where we were going.

During the five-minute taxi the rate of snowfall fluctuated, increasing at times towards moderate. I noticed that all of the other aircraft preparing for departure had already been or were being de-iced/anti-iced.

When we taxied onto the runway and lined-up, I was amazed. Not so much by the thin covering of snow and slush on the wing but by the apparent lack of concern of its presence.

As a ### (*same twinjet type*) pilot myself I am only too aware of how difficult it is to judge whether your wings are free from snow or ice by just looking out the flight deck windows.

Sitting just aft of the leading edge I could see that thankfully the leading edge devices were clear but that the aft three quarters of the wing was contaminated with patches of what looked like 2-3mm of snow and slush most of which but not all blew away on take off.

Both the colleague I was with and I were unhappy and concerned by this and the possible reasons why the aircraft was not de-iced. Perhaps because a local crew, who must be very used to operating in similar conditions, was operating the aircraft, they may have become less sensitive to the importance of de-icing. Or, perhaps, the much-championed 'short turnaround' policy placed too great a time pressure on the crew to make a last minute inspection of the wings and to wait for de-icing.

Whatever the reason, I am unhappy about the level of risk taken on that day and would certainly be reluctant to board an ### flight again.

I am not trying to make a big fuss or create a witch hunt but perhaps ### might consider issuing an internal memo to all flight deck crews reminding them of the need to use de-/anti-icing.

\*\*\*\*\*

### (3)

One snowy afternoon at AAA (*UK Regional airport*), the author was Captaining a ### (*twinjet*) aircraft back to base. Continuous moderate snowfall over a period of a few hours had left over 10mm of wet snow on our airframe and the ground. Continuing snowfall was making snow clearance operations difficult and we were obviously in for an indeterminate delay.

#### Concern Number 1:

Accurate SNOWTAM information was not readily forthcoming from AAA ATC. The ATIS simply stated

(incorrectly) that "The runway is wet with de-icing fluid". It wasn't! It was contaminated with snow and the information we needed in order to assess conditions and comply with operating limitations was unacceptably difficult to obtain.

**Concern Number 2:**

Imagine our surprise, (as we were waiting for the weather to improve) when a ### twinjet (*same type*) taxied out and took off. The runway braking action was subsequently given as no more than .19 over the whole length i.e. poor. Our Operating Manual (for the same aircraft type) forbids take-off in these conditions. Also the ### twinjet fuselage had not been de-iced and take-off was made with approx 10mm of snow covering 90% of the upper fuselage surfaces. The pilot was informed (by another pilot on the ground frequency) of this airframe contamination. Our Operating Manual for the same A/C type permits NO contamination on the fuselage except thin hoar frost.

Thirty minutes later a second ### aircraft (*a rear engine twinjet type*) did exactly the same. He too had similar snow deposits on a non de-iced fuselage. He ignored being told of this fact over the R/T. There had been no improvement in the runway state and ATC had still not managed to provide SNOWTAM information including braking action.

Something plainly is seriously amiss with the safety culture at ### and that airline's procedures/training for winter operations, for this to happen not once but twice. The risks taken by the two crews were severe in my opinion. Accident statistics document numerous incidents associated with contaminated runways and icing conditions and luck alone kept these two flights out of the figures.

Everyone else that day (from a variety of airlines) accepted the delays and waited until conditions were safe.

*All of the reports received on this subject were forwarded to CAA (SRG) Flight Operations Department for consideration. As a result of these reports and other information CAA (SRG) has undertaken a review of the advice on Winter operations.*

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*And a further report from our Cabin Crew Programme:*

(4)

Outside it was dark but with the sun just rising. As I went to conduct the pre-take off safety demonstration in the centre of the aircraft, I noticed ice on the left wing (the right wing couldn't be seen because of lack of sun light). I informed the flight crew and we returned to

Stand. Flight crew were supportive and requested engineer to look at wing.

This is where my concern is: the attitude of engineer was off-hand. He implied both Captain's and my own observations were wrong and the aircraft had been de-iced properly. In fact, when made to de-ice aircraft again, he found ice on the wing!!!

The attitude of the engineer was questionable but is the method of de-icing also?

*The Company concerned conducted an investigation into this incident. The investigation revealed that the aircraft had already been de-iced twice prior to the initial departure, including a re-application to the right wing trailing edge root area. After the cabin crew report and return to stand, de-icing foam was found near the leading edges with an ice deposit underneath; this was removed and the aircraft departed.*

*Subsequent investigation revealed that the Type II Plus fluid in use needs a different application procedure to the earlier Type II fluid, as the former does not flow so easily and tends to foam if applied in a jet. Also the holdover times used by the engineers and flight crew were found to be different; these have now been resolved by agreement.*

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**GOOD CRM?**

A departure from SOP's by the Captain of a twinjet whilst landing at ### resulted in 'long landing' and a maximum effort to stop the aeroplane on the remaining runway. The 'non handling' First Officer requested that the Captain and he debrief what had been a potentially dangerous situation.

The Captain was very dismissive of this suggestion and, taking into account this incident and previous CRM problems, the First Officer submitted a report to management.

The investigation resulted in the pilot in question receiving further line training with a Line Training Captain in the Right Seat. However, as can be expected, the individual was rather unhappy with the First Officer's action of reporting to senior management. The airline made this whole affair very much worse by rostering the two individuals together for several multi-sector days immediately after the Captain was released from training. Despite the F/O complaining to his fleet manager and safety officer the two had to work together in a very bad cockpit atmosphere.

Safety was compromised these three days.

*Whilst the Captain has the authority, good Crew Resource Management requires that a First Officer be aware of his/her responsibility to bring potentially*

*unsafe situations to the attention of the Captain. The First Officer acted quite correctly in this instance.*

*Many operators make available confidential/peer reporting processes to facilitate the reporting of incidents of this kind, and have management processes that are designed to avoid the type of subsequent Human Factors problem that was created by the management response in this instance.*

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### **CABIN CREW BUZZER**

On the ### fleet, the new flight deck door policy introduced since Sept 11th means that the cabin crew communicate with the flight crew by interphone.

The buzzer, which sounds in the flight deck, is a serious safety hazard; it is so loud that R/T calls can be missed easily. The Company, I gather, have ruled out a possible modification on cost grounds.

Cabin crew training also leaves a lot to be desired on this front - I recently was called three times during engine start, (all of which I ignored) and on another occasion twice between 400ft and 1000ft on climb-out. When we answered these calls, nobody was on the other end!

*The revisions to SOPs that have accompanied the new flight deck security measures have, in some circumstances, led to increased use of the cabin interphone system; it follows that the alerting and operating functions of the system should be acceptable in relation to these new procedures.*

*Some operators' SOPs contain advice on minimising calls from the cabin to the flight deck during some phases of flight.*

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### **RFFS FIRE COVER**

During descent, we were informed by ### ATC (*Non UK airport*) about emergency traffic and thus vectored to hold.

Eventually we commenced the approach, with a fuel state approximately one tonne in excess of the minimum required fuel.

When fully established on the ILS to R/W ##, we were informed by ATC that the fire cover at the airfield was zero. Passing 2500', we elected to continue to 1000'. We continued and after gaining visual contact with ground we landed uneventfully. However, ### ATC continued to give aircraft options to land, take off, start, fuel etc., despite the lack of any fire cover at the aerodrome.

After discussion we decided the decision to land was correct, but we should never have been given the option.

*As far as UK licensed aerodromes are concerned, the Aerodrome Authority is responsible for maintaining the promulgated levels of RFF protection throughout the hours of licensed operations.*

*When the fire service is temporarily depleted, the Aerodrome Authority is responsible for making arrangements to notify any significant change in the level of protection available at that time. This would normally take the form of an ATC message and be promulgated by NOTAM, which would state the actual RFF Category available. Immediate action should be taken to reinstate facilities whilst considering whether landings and take-offs by aircraft required to use a licensed aerodrome should be restricted. The procedures relating to Unforeseen Temporary Depletion will be detailed in the Aerodrome Manual and the Manual of Air Traffic Services Part 2 for the ATS unit. Guidance on Unforeseen Temporary Depletion can be found in CAP 168 'Licensing of Aerodromes' Chapter 8 Section 5. This guidance includes provision for an aircraft to make an emergency landing and "for occasions when, in the pilot's opinion, a diversion or hold may introduce a more significant hazard."*

*As noted, this report involved a non-UK airport. While the operator has a legal responsibility to satisfy himself prior to despatch that the destination aerodrome has an adequate level of fire cover, in the situation described in the report, the aircraft commander has to decide on a balance of risk whether to divert, hold or continue.*

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### **NUISANCE TCAS TA'S**

My home base is LHR where I fly shorthaul routes for ###. Each year, I fly almost 400 sectors in and out of LHR, and receive approx 100 TCAS "Traffic" alerts whilst flying within the London TMA. Maybe 50% of "Traffic" TA's are due to high rates of climb/descent relative to other scheduled IFR traffic (see CHIRP reports in Issues 62 and 63). The remainder are caused by low level (no conflict) GA traffic and helicopters flying to/from Battersea Heliport who exhibit no altitude information because they do not squawk Mode 'C', indeed if Mode 'C' were to be squawked, no TA would be triggered.

Helicopters from Battersea heliport are a particular problem and are responsible for a high proportion of TA warnings in the London TMA. These warnings occur at times of high workload at lower altitudes for crews on approach to LHR 27L+R. They operate at night and in marginal weather when visual acquisition is impossible. These helicopters are (I believe) well equipped, well funded and IFR capable and so would be able to quickly comply were Mode 'C' mandated. Also I suspect (please

correct me if I am wrong!) sometimes that these helicopters already possess Mode 'C' but their pilots choose not to switch it on. Other commercial/ public service operators (e.g. police and radio station traffic observation flights) should also be able to comply.

So what? The recent mid air collision in Swiss airspace tells us that maximum safety benefits of the TCAS system are not being realised. Like the boy who cried wolf, the effectiveness of any warning system becomes compromised as the level of false warnings increases.

Pilots, like myself, are being conditioned with unacceptably high rates of nuisance TCAS warnings due to non-Mode 'C' traffic. This may degrade our performance when it really matters!

Many (no altitude TA) nuisance warnings occur in periods of high workload on approach to LHR. These must be dealt with as per SOPs at the same time as configuring/changing speed, heading, frequency, etc, thus increasing the chances of making errors through distraction whilst actioning TCAS procedures.

I urge that use of Mode 'C' is mandated for all traffic flying under the London TMA in order to halve the incidence of nuisance TCAS alerts for traffic within the London TMA. The London area is extremely densely populated. To minimise the risks of injury/damage to persons and property on the ground, it makes sense to promote and mandate the highest standards of flight safety for all air traffic in and under the London TMA.

***The introduction of TCAS 2 version 7 software should greatly reduce the incidence of nuisance alerts due to high rates of climb/descent.***

***It is normal practice for Public Transport and IFR capable helicopters operating into/out of Battersea Heliport to squawk Modes 'A' and 'C'. Helicopter Route 4 to the east of Battersea is a busy route and may give rise to some of the nuisance alerts reported.***

***It is understood that CAA (SRG) is currently reviewing the policy for the use of SSR. In the meantime, given the high proportion of Public Transport aircraft that are fitted with ACAS equipment, the safe option for all aircraft fitted with a SSR transponder would be to use Modes 'A' and 'C' whenever possible, unless otherwise directed.***

## **FLIGHT CREW COMMENTS**

### **ANOTHER ATC BLACK HOLE**

Having just read a report concerning ATC 'Black Holes' in the Northern North Sea Helicopter route structure, I was inspired to write a report on the very same matter but a slightly different location. We are one of many (*fixed wing*) operators that fly around the country using Advisory Routes under RAS provided by Scottish.

Whilst using W3D around the Wick area and also the entire area of W6D we are never in contact with the Scottish controller unless we temporarily deselect the 'Squelch' control on our radios to receive a response.

We too, just like the North Sea Helicopter pilots have to fly IFR public transport flights around the barren lands of Scotland with no direct contact with ATC, unless via relay. Is this acceptable? Does this, by definition, fulfil the criteria of Radar Advisory, when Scottish are unable to advise us?

Again, because the problem has been so longstanding without incident it is ignored.

It cannot be said, like it has for the area west of Shetland, that there are no suitable land based sites. It is mainland UK.

Is this acceptable? I don't think it is.

***NATS advise that only one incident report relating to this problem has been submitted in the past 19 months, as a result of which all the equipment was checked, including transmissions to other aircraft on the same route and level; these failed to confirm the problem.***

***If problems of this nature are experienced, the best course of action is to submit a Safety Report to permit the frequency of occurrence to be determined and the cause of the problem, which might be related to the aircraft type, to be investigated.***

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### **AIRPROX REPORTING (FB 63)**

#### **(1)**

As an experienced professional police helicopter pilot with over 20 years and 6,000 hours experience, I read with concern and dismay the "Airprox Reporting" letter in the July issue of FEEDBACK.

The author's view is not uncommon. Sadly it seems that all too many "professional" pilots adopt the same attitude when considering use of what could and should be an important Flight Safety tool.

Many (other) experienced pilots have felt for some time that the current 'AIRPROX Reporting System' does not reflect a true picture of collision risk in the lower airspace due to the poor reporting rates. For this reason and in order to promote appropriate submission of AIRPROX reports, the British Helicopter Advisory Board (BHAB) Emergency Services Committee initiated an "Aircraft-In-Vicinity" reporting scheme. This involved the 29 Police and 14 HEMS units submitting monthly reports on all incidents involving 'proximity' with other aircraft "in circumstances which give cause for concern".

The idea was to produce statistics that give a more accurate picture of collision risk.

Despite the relatively small numbers of units reporting, the total numbers of incidents was alarmingly high - 214 in just two years. Even this figure is probably an underestimate. Many of the incidents, like the one described by the author of your article, were spine chilling, yet very few AIRPROXs were submitted.

Apart from the lessons that could be learnt from such incidents, we do not further the cause of Flight Safety by under-using the AIRPROX system. Statistics are kept artificially low, collision risk is therefore under-estimated and less is done to improve safety

So come on, it is surely incumbent on us all to use all means at our disposal (including, where appropriate, the AIRPROX System) to make our flying safer.

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## (2)

What a pity that in response to the article on 'Airprox Reporting', the Director of the UK Airprox Board missed the key point, that the pilot felt unable to report an airmiss due to the apparent blame culture in his organisation.

Perhaps a more appropriate response might be to ask the pilot's boss for a meeting (over coffee) to inform him that the meeting (without coffee) and implied blame at reporting is not a good way to encourage air safety.

I feel very lucky that my Company has a real no-blame culture; we are encouraged to report by management who lead by example; they publish their own mistakes and consequently we feel able to do the same.

Yes, we must report incidents, but the reality of human nature is such that if a pilot feels sufficiently that there will be blame, they will not report. I hope this will be relayed to the boss in question, and that the Director of the UK Airprox Board wakes up to the blame culture that still exists in some organisations.

No wonder the pilot in question was "not convinced that the Airmiss Committee would have helped."

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## HELICOPTER 'A' CHECKS

I have been flying helicopters for many years, much of the time in the North Sea. In these situations flight crews are required to do check A's or some similar engineering inspection. In reality they are not done for one or more of the following reasons:

1. In situation duty hours are usually limited
2. By the nature of being away from engineering support it is a hostile situation i.e. on an offshore installation

3. Crews do not have overalls/foul weather clothing etc that will often be needed to carry out the work
4. There is always a risk of causing minor damage that cannot be rectified - breaking a latch or a self-sealing magnetic plug failing and dumping the gear box oil in cabin (this has happened four times to my knowledge) - this would then strand the aircraft and crew in a difficult situation.
5. **Not all flight crews have the mechanical bent to feel competent at the task. Even if properly trained they generally are not required to do these checks often enough to feel experienced in the task.**

Crews feel that the aircraft was serviceable on landing then they have no reason to doubt it will remain that way. I am mechanically minded and have my own routine when faced with the situation.

1. Remove all blanks/tie-downs
2. Carry out another task
3. Carry out an extended pilot's walk around only opening panels etc if the situation is favourable
4. Carry out some other task
5. Return to the aircraft and complete a normal pre-flight inspection - all crews feel uneasy about the situation and it would be easier if a dispensation existed in these circumstances.

***When approached on this issue, the CAA did not consider the need to alter the present arrangements.***

***The Quality Manager of the maintenance organisation responsible for the aircraft has the ability to issue deferments, in appropriate instances, sufficient to recover the aircraft to a location where the 'A' checks can be completed. However, there cannot be any deferment to checks required to comply with any applicable Airworthiness Directive.***

***The interval between checks on the larger helicopters is such that the instances where flight crews are called on to perform the checks are infrequent.***

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## ATC SPEED CONTROL

Reference the item attached page from Issue 62, please could CHIRP ask our ATC brothers how the ATC restriction of 160kts until 4nm came into being?

This seems to have become standard at most UK major airports. It is an SOP in my airline that we are established at 1000 AAL (i.e. about three mls) in landing configuration and stabilised in speed. This therefore gives us about one mile to get landing gear and flaps down, decelerate and perform the landing checks. It would be better for us if someone had chosen 5nm or

even 6nm. Please could you explain in a letter to me or in FEEDBACK how the 4nm limit came into being.

Did ATC ask the airlines?

***The speed of 160KIAS and the range of 4nm were agreed following consultations between CAA (SRG), NATS, BATA and several of the principal UK AOC holders when the procedures were developed.***

***The selected speed is necessarily a compromise between different aircraft types and the requirement to maximise runway utilisation.***

## ENGINEERING REPORTS

Engineering Reports received in Period: 6

Key Areas:



### CUSTOMS SEARCHES

I run a small Line Maintenance Section at ### (UK Airport). My company has contracts to service several operators at this airport. Our most recent contract is to handle large wide-bodied aircraft.

In the past we are used to being requested by HM Customs to 'assist' with them searching an aircraft. For example gaining access to avionics compartments and air conditioning bays etc. This is simply opening access panels on the aircraft that have quick release fasteners or have proper access handles. I assume HMC require to access the aircraft to look for items such as drugs etc. My staff and I have no problem in assisting in this way.

However, on the day in question after the aircraft arrived I performed a walk-round inspection and then went to door 2 to board the aircraft and debrief the inbound crew and review the Technical Log book. At the door were many customs officers. One then immediately said to me

"Are you the engineer?"

"Yes." I say.

"Good" says the officer. "I want you to remove some blow out panels in the cargo hold so that we can look in them."

Now the issue at stake. I am contracted to perform Line Maintenance on this aircraft and to fix defects on the aircraft, we are not employed by HMC nor are we contracted to rip the aircraft apart to satisfy the

requirements of HMC. I pointed this out to the Customs Officer concerned who pointed out," We are HM Customs", and went on to say that they would do as they wish.

When I finally was allowed access to the aircraft I noted that Customs Officers had removed panels from within the lavatories and were in the process of dismantling a toilet module. This work required the use of tools and even the loudspeaker modules were removed. At no time was this work recorded in the Technical Log neither was any attempt made to contact me as regards to ensuring that the items removed in a safe manner or were replaced properly. Surely some proper control of these activities is required? .

In the case of the lavatories there are requirements to ensure that the work adheres to the proper sealing for fire protection after closure of panels that are opened. In the case of cargo holds the panels have to be properly sealed to ensure the integrity of the hold in case of fire or smoke and additionally 'blowout' panels have to be properly replaced to ensure that they are sealed and will actually operate when required in a decompression.

I sign the aircraft out and am responsible for its serviceability, I cannot be responsible for the activities of HMC unless properly reported and the work recorded.

There appears to be a conflict of interest here in that Customs appear to think they can do as they wish and we have to do as they say. But who pays for this work and I am then diverted from my contracted task of actually fixing the aircraft for the next service, placing additional time pressure on me and my staff to fix what can be a challenging aircraft.

***The Engineer was advised to speak to the senior local Customs official; this action produced a satisfactory result to the problem reported.***

***From this report and other similar concerns previously reported, the CHIRP Advisory Board concluded that there appeared to be a need for a wider understanding of the Regulatory requirements for the certification and conduct of maintenance tasks among some HM Customs personnel. To this end a meeting was held with HMC officials; the Chief Surveyor CAA (SRG) also attended.***

***Material used in training 'rummage crews' contains references to the need to have the assistance of qualified engineers where it is deemed necessary to gain access using tools. However, it was agreed this requirement would be given additional emphasis during future training and that any refresher courses would similarly emphasise the requirement for a qualified engineer. CAA (SRG) have offered to assist in this process if necessary.***

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## STANDARDS

My account of events are not only one occurrence, it is about the continual eroding of standards to the extent that I believe may be becoming potentially hazardous. The continual pressure from our middle management has increased sharply this year and it is this pressure which is being forced by verbal abuse, cajolery and belittlement - I know these are strong words but to a varying extent all our engineers believe this to be true.

I have concerns about flight safety implications with my company over undue pressure being placed on engineers to effectively dumb down their standards of servicing. I work for a carrier who over the last year has substantially increased its flying hours and at the same time reduced its manpower. Aircraft are now landing 1, 2 or even 3 in the morning usually with substantial defects leaving very little time to rectify. For example: I had an aircraft land at 0230 hrs in the morning; by the time the passengers had disembarked and the daily servicing had been carried out it was 0400. At this time I found a major defect which, upon informing the senior duty engineer, all hell broke loose with him showing extreme agitation that the aircraft would not be ready by 0600hrs. Although he did not tell me to ignore the fault, his attitude was obvious that he wanted me to ignore the fault.

Of late, the number of running defects has increased notably where engineers, to use a phrase, are penning off regularly defects; although not dangerous, they are well outside the MEL/MM limits. The number of re-occurring defects have increased but are not being rectified correctly simply because the company does not want the aircraft to be grounded for correct diagnosis and rectification. The aircraft deferred defects register is going through the roof with far too many defects being carried with no down time to rectify. Many defects are being carried by the aircrew with no traceability, being verbally communicated to the next crew. As you may guess the morale of the engineers and mechanics is rock bottom, the lowest I have ever seen. Being under pressure every day for the full 12 hours does wear people down especially when you don't have experienced engineers or spares and when you do not have support from your management. I have great concerns that a major accident/mistake will occur in the future.

To conclude: I cannot believe that the CAA have their heads in the sand, they must be aware of what's going on, but by not saying anything they can deny any responsibility. As for my company it is perceived that the management do not care about the well-being of their employees and they certainly do not care about the safety of their customers. In fact the attitude from the management is profit at all costs. To me it is the management who with their continual aggressive policy will influence a lesser engineer than me to make a

serious error, but of course it will be the engineer who will take the rap when something does go wrong.

*The reporter's comments and other similar information received in other reports were brought to the attention of the senior management of the organisation concerned.*

*Whilst acknowledging that there were inevitable pressures in the highly competitive environment that currently exists within the Industry, the senior management reaffirmed the Company's policy that no compromise with safety would be tolerated. The Company had already embarked on a series of changes to balance fleet dispositions, workload and staffing these included the employment of additional engineering staff. Management anticipated that these changes would address the concerns raised in confidential reports.*

## ENGINEERING COMMENTS

### LICENSING

Over a period of some two years CHIRP has received a significant number of reports from engineers concerning licensing issues and in particular the change from the previous BCAR Section 'L' licence to the recently introduced JAR-66 licence. These reports do not address specific HF safety concerns, which are the remit of this Programme. However, after reviewing a selection of the reports received on this subject, the CHIRP Advisory Board concluded that the issues raised might have longer-term adverse effects on the number of suitably qualified engineers available to the Industry, with possible safety implications. On the Board's recommendation, the principal issues raised in these reports were made available to CAA (SRG) Personnel Licensing Department (PLD) for information.

Subsequent to this, a meeting with senior CAA (SRG) PLD representatives was held to discuss the issues in greater depth. From these discussions it was apparent that CAA (SRG) had made significant efforts to address many of the issues that have arisen in relation to the licence transfer process. It was agreed that it might be helpful to circulate a summary of the issues that have been raised in reports together with the CAA (SRG) PLD responses to Engineers for information. To this end, all Engineers should find a two-page A4 insert enclosed with this issue of FEEDBACK.

If your copy of FEEDBACK does not contain an insert and you wish to review the information, a copy is available on the CHIRP website - [www.chirp.co.uk](http://www.chirp.co.uk). Alternatively, please contact the CHIRP office for a copy.

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## CAA (SRG) FLIGHT OPERATIONS DEPARTMENT COMMUNICATIONS (FODCOMS)

The following CAA (SRG) FODCOMS have been issued since July 2002:

CAA (SRG) Flight Operations Department Communications are published on the CAA (SRG) website - [www.srg.caa.co.uk](http://www.srg.caa.co.uk)

### 19/2002

1. ACAS - Action To Be Taken Following a Resolution Advisory (RA) Warning - Reminder of actions detailed in advisory material.

### 20/2002

1. Aircraft Handling in Turbulence - Recommended procedure in the event of encountering severe turbulence in the hold or in similar flight conditions to avoid recent incidents in which an aircraft has deviated by more than 300ft from assigned level.

### 21/2002

1. UK Public Transport Smoke/Fumes Occurrences - History, Actions Taken, Ongoing and Planned, Recommended Operations Manual Procedures.
2. Emergency Procedures for Cabin Altitude Warning - Recommendation that the first and immediate action of the emergency procedure in response to a cabin altitude warning is to don flight crew oxygen masks and establish communications.

### 22/2002

1. In Flight Fire Fighting Procedures - Summary of NTSB recommendations for the enhancement of in-flight fire fighting procedures.

### 23/2002

1. Fuel Tank Safety - Proposed Airworthiness Notice 55 to conduct fleet surveys.
2. GPWS Warnings - Incidents involving nuisance Mode 2A alerts (Excessive Terrain Closure Rate with aircraft not in the landing configuration) due to rising ground/high forward speed.
3. Eurocontrol ACAS II "Safety Flash" Bulletin - To achieve the full safety benefit of TCAS 2, it is essential that flight crew respond accurately and promptly to Resolution Advisories. ([www.eurocontrol.int/acas/](http://www.eurocontrol.int/acas/))

4. Reporting of Bird Strikes on Aircraft - Co-operation of operators requested to collect reports of birdstrikes and near misses.
5. CRM Industry Forum - 31 October 2002

### 24/2002

1. Requirement for an Accident Prevention and Flight Safety Programme
2. Recording of Flight Times - When an aircraft crew consists of more than the required number of pilots i.e a 'heavy' crew

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## CAA (SRG) ATS INFORMATION NOTICES (ATSINS)

The following CAA (SRG) ATS Standards Department ATSINS have been issued since July 2002:

CAA (SRG) ATS Information Notices are published on the CAA (SRG) website -

[www.caa.co.uk/publications/publications.asp?action=sercat&id=2](http://www.caa.co.uk/publications/publications.asp?action=sercat&id=2)

### Number 15

ACAS Interface with ATC - Controller and Flight Crew responsibilities and recommend actions for ACAS.

### Number 16

Avoiding Action - Use of the newly promulgated Avoiding Action phraseology

### Number 17

Lapses and Mistakes - Continuing trend for errors involving lapses and mistakes to occur.

### Number 18

Thin Film Transistor Liquid Crystal Displays (TFT-LCD) - Safety analysis prior to replacement of CRT displays.

### Number 19

Approach Minima - Reminder to managers of ATC units of correct phraseology and procedures, as detailed in MATS Part 1, to ensure pilots are aware of UK legislation that prohibits an aircraft from descending through a height of 1,000ft above aerodrome level if the last reported RVR is below that notified as being the minimum for the approach.

