

# FEEDBACK

Issue No: 72

Autumn 2004

## CHIRP FIVE-YEAR REVIEW

A review of the CHIRP aviation and maritime programmes was conducted on 27 July 2004 by a Review Board comprised of nominees from the sponsoring agencies {DfT, CAA(SRG)}, independent members and CHIRP Trustees. The Board was chaired by Captain Jock Lowe. The following text is reproduced from the Executive Summary to the Report of the Review Board:

The objectives of the review in respect of aviation were:

- to review the need for, and adequacy of an independent, voluntary non-punitive, confidential reporting process
- to assess how effective CHIRP has been in providing a confidential reporting process in the air transport domain in the period since the major review by the Guild of Air Pilots and Air Navigators in 1994
- to determine if there is a continuing need for a confidential reporting system within the overall safety process, and if so what changes, if any, should be made to improve the effectiveness of such a programme

The Board examined the structures, processes and procedures introduced since the 1994 Review and assessed their cost-effectiveness. The Board also reviewed the principal aviation issues raised through the Programme over the past five years and considered whether the actions taken by CHIRP in response to these had been appropriate and beneficial to flight safety. Finally the Board assessed the value of the Air Transport Programme as perceived by the relevant user groups and operational managers in a survey conducted as part of the Review.

The Board concluded that there is a clear and unequivocal need for an independent confidential reporting process in aviation, and that without the availability of CHIRP it is probable that significant issues raised through the Programme would not have been reported and others would not have been acted on as promptly as had been the case. The Charitable Trust structure, management changes and new processes introduced since 1996 had addressed all of the principal recommendations of the 1994 GAPAN Review, are cost-effective and entirely adequate for the process.

The survey of user groups showed clearly that the availability of CHIRP and the publication of reports in FEEDBACK continue to be highly regarded by all professional groups. The survey of airline/engineering and ATC managers indicated strong support for CHIRP from all management groups, but identified some areas in which the presentation of data and report information to managers could be improved.

Given the contributions of CHIRP and the strong support from Industry, the Board concluded that the funding of the CHIRP aviation programmes must be assured on a long-term basis and be sufficient to permit the programme to carry out its intended function effectively. Only two appropriate sources could be identified, the Civil Aviation Authority and the Department for Transport.

## CHIRP SURVEY RESULTS

In the survey of flight crew, ATCOs and Licensed Engineers, we received 1,790 completed responses, around 6% of the total number of forms sent out. This percentage return is within the range expected for a survey of this kind. Our thanks to everyone who took the time to respond.

In the case of the survey of Flight Operations, ATS and Engineering managements, we were able to make a follow-up request to recipients; this produced a return of 45% in this category.

A breakdown of the Survey results and a summary of comments received are published on Page 12.

A large majority of the comments were positive in relation to the Programme itself and the size, content and frequency of distribution of our FEEDBACK newsletter. We also received suggestions for improvements and, as might be expected, a number of critical comments, although these were relatively few. Several of the latter were published in the last issue. All of the comments are being reviewed and, where necessary, changes will be introduced over the next six months or so with the objective of improving both our service and the CHIRP FEEDBACK publications.

An Air Transport Safety Newsletter

from the Confidential Human Factors Incident Reporting Programme

CHIRP, FREEPOST (G13439), Building Y20E, Room G15, Cody Technology Park, Ively Road, Farnborough GU14 0BR Freefone:(24 hrs) 0800 214645 Fax 01252 394290

You can also e-mail us at [confidential@chirp.co.uk](mailto:confidential@chirp.co.uk) - visit our website at [www.chirp.co.uk](http://www.chirp.co.uk)

## NEED TO CONTACT US?

**Peter Tait** Director  
Flight Crew/ATC Reports

**David Johnson** Deputy Director (Engineering)  
Eng/Maintenance Reports

**Kirsty Arnold** Cabin Crew Programme Manager  
Circulation/Administration  
Cabin Crew Reports

~OO~

The CHIRP Charitable Trust  
FREEPOST (G13439) [no stamp required]  
Building Y20E, Room G15  
Cody Technology Park  
Ively Road  
Farnborough GU14 0BR, UK

Freefone (UK only): 0800 214645 or  
Telephone: +44 (0) 1252 395013  
Fax: +44 (0) 1252 394290 (secure)  
E-mail: confidential@chirp.co.uk

## CHANGE OF ADDRESS?

If you receive FEEDBACK as a licensed pilot/ATCO/maintenance engineer you will need to notify the department that issues your licence of your change of address and not CHIRP. Please write (including your licence number) to Personnel Licensing, CAA (SRG), Aviation House, Gatwick Airport South, West Sussex RH6 0YR:

Flight Crew.....Post - as above  
Fax: + 44 (0) 1293 573996  
E-mail: fclweb@srg.caa.co.uk

ATCO.....Post - as above  
Fax: + 44 (0) 1293 573974  
E-mail: maggie.marshall@srg.caa.co.uk

Maintenance Engineer..Post - as above  
Fax: + 44 (0) 1293 573779  
E-mail: eldweb@srg.caa.co.uk

## REPRODUCTION OF FEEDBACK

CHIRP® reports are published as a contribution to safety in the aviation industry. Extracts may be published without specific permission, providing that the source is duly acknowledged.

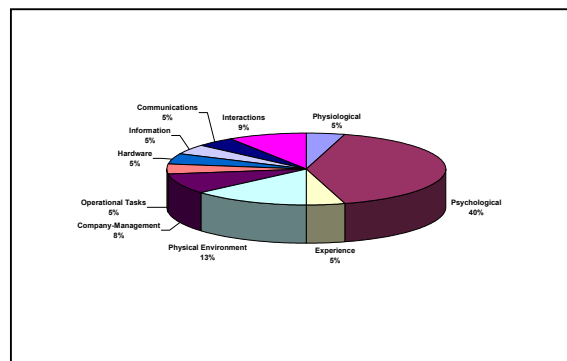
FEEDBACK is published quarterly and is circulated to UK licensed pilots, air traffic control officers and maintenance engineers. If you are not already on our circulation, and would like to be, please send your application in writing to Kirsty at the above address.

Registered in England No: 3253764 Registered Charity: 1058262

## ATC REPORTS

ATC Reports received in Period: 3

Key Areas:



## DISTRACTION AND TRAINING

A recent serious landing incident, in which there were possible ATC implications, has raised concerns about distraction in the Visual Control Room (VCR) and the effectiveness of the unit training plan.

Although not a factor in the incident, an AFTN (Aeronautical Fixed Telecommunications Network) link is adjacent to the VCR position and on the occasions when an ATC Assistant is not available, due to other duties such as bird-scaring, the ATCO can be distracted from his principal VCR task for significant periods of time. This is a concern to many of us.

The other concern is that little or no practical Emergency training takes place at this Unit. Controllers mainly organise their own training, involving videos or visits. Most table-top exercises become operational type discussions not involving aircraft emergency scenarios, and many of us have not done any proper training in over two years in spite of constant requests to do so.

Following the serious incident the controllers concerned received letters from management praising their actions but no internal action has been taken to try to address some questionable ATC aspects of the incident. The controller on duty filed a report but did not request the removal of the tapes in accordance with unit practice. The unit management response to this incident has been particularly disturbing for some controllers already working in a stressful situation with no one willing to help out with improving the quality of the Emergency training.

*Any significant distraction in a busy VCR environment is unsatisfactory. Equipment that may divert a controller's attention from his/her primary task in some circumstances should be subject to a formal assessment to ensure that any risk can be effectively mitigated.*

*The report has been passed to CAA (SRG) ATS Standards. CAA (SRG) have responded that they take the issue of controller distraction very seriously and are investigating both of the reporter's concerns.*

\*\*\*\*\*

## TAXIWAY LIGHTING

The following statements are drawn from the Report on the Milan Linate crash: "The green centreline lights were not..... controllable by ATC; they could either be all ON or OFF", "Pilots were routinely instructed to cross red stop bars while the lights were ON since there was no selective switching capability by ATC".

From this Unit's MATS Part 2: "(if there is a fault) aircraft should be instructed to cross each individual stop bar."

Over the past few months, there has been an increasing number of faults in the aerodrome ground lighting (AGL) system. Faults that are still present have been known to both us in ATC and the airport operator for many months. No attempt at the rectification of such faults appears to have been undertaken. The number of ghosting green routes (including on to active runways) and 'stuck on' red stop bars is reaching very significant proportions.

As explained above, the fact that aircraft were used to being instructed to cross red stop bars at Linate was identified as a causal factor. How long before a similar incident happens here? This problem also increases the R/T almost exponentially. Instead of simply issuing a standard taxi instruction, and that being the end of R/T transmissions to that aircraft, we are now faced with the situation on Ground Movement Control (GMC) of avoiding all the many areas of WIP on the aerodrome, then the aircraft querying the red stop bar, compelling us to co-ordinate with the Lighting operator to ensure we know which stop bar the aircraft is referring to, then coming to a decision as to whether it's because of misrouting or a fault, then telling the aircraft to cross or hold as appropriate. And a few minutes later the same aircraft queries another lighting fault, and the whole cycle begins again. At times of high traffic loading this severely affects our ability to expedite traffic flow.

Both cost and manpower available have been, unofficially, given to us in ATC as reasons why no work is being done to correct the lighting faults. However, I'm sure I am not alone in thinking these reasons are completely unacceptable for the present risk to flight safety. Again, I reiterate the fact that many ### based crews are becoming familiar with the lighting faults and having to cross stuck red stop bars. How long have we got before one aircraft crosses a stop bar that isn't stuck? Or takes faulty green lead-on lights as perceived to be a line up or crossing clearance?

Some anecdotal evidence; as a rough guide in normal circumstances GMC is deemed to be 'busy' if he/she has a full bay of flight strips. One evening recently the bay was never more than 2/3 full (many inbounds stationary holding for stands), and yet GMC was working right to capacity, with the number of aircraft queries about lights and routings. On another occasion, when the lighting system was switched on, the complete AGL system failed totally. It recovered after 10-20 seconds and then failed completely again. These occurrences are becoming more and more frequent come 'switch on' time. It is now getting to be a surprise if everything works at switch on.

All lighting faults need to be repaired before winter hits us in earnest and we have the AGL system switched on for 15 hours out of 24.

This situation would not be tolerated at a small regional airport. Why is it tolerated at a major airport?

*Prior to this report being submitted, the problems described above had been the subject of formal reports.*

*The reporter's concerns were represented to the Head of Aerodrome Standards CAA (SRG) and have been investigated. The investigation showed that the runway lighting, recently replaced, had not been affected. A remedial plan has been agreed with the airport operator with taxiway stop-bars being afforded the highest priority. The reporter's allegation of a complete AGL failure was not confirmed*

*The Human Factors risk in conditioning pilots to cross illuminated red stop bars and to ignore green lead-in lights is significant, particularly if these airfield lighting defects are routinely encountered.*

*Any procedural solution to problems such as those described in this report has an attendant risk of human error, both for the pilot and the air traffic control officer.*

## ATC COMMENTS

### RUNWAY CHANGES AND NON-PRECISION APPROACHES (FB71) - AN ATCO'S VIEW

Re: CHIRP Feedback No. 71 (Summer 2004)

As an ATCO (for more than 25 years) and a current ATS Manager at a major UK regional airport, I should like to comment upon three of the Flight Crew Reports contained in the latest Feedback - "Runway changes (1 and 2) and "Non-precision approaches".

Firstly, I have much sympathy with the views stated by the flight crew concerned. It is certainly true that some ATCOs have little or no appreciation of flight deck tasks and workload, any more than do some pilots have for the tasks and considerations taken by ATCOs when executing their duty. For that, I must blame a lack of

adequate communication above all else, perhaps coupled with a professional insularity and an absence of comprehensive (thus potentially expensive) training.

Many ATCOs today receive training in just one ATC discipline (i.e. En-route or Aerodrome/Approach) and hence do not have a detailed appreciation of the "big picture" from a pilot's viewpoint, and that is to be greatly regretted. Similarly, how many pilots actually take time to plug-in with an ATCO at an Airfield or Area unit when it's busy? In my experience, very few indeed. A cursory, semi-social visit to ATC or a brief flight-deck trip cannot hope to convey the pressure under which the ATCO or pilot can be placed, nor the degree of judgement and knowledge required in order to do the job well.

Returning to the three Flight Crew Reports, pilots have an absolute right to know the runway-in-use and should be able to brief accordingly. I concur entirely with your suggestion that pilots should consider requesting confirmation of the landing runway-in-use on first contact at those airports where late notification of the runway is the norm. If the relevant ATC agencies object to this, then recourse to the MOR scheme and representation by the CAA to the foreign regulatory agency may be necessary.

Turning to the matter of the platform altitude for non-precision approaches, I suggest that the allocation of the platform altitude is not a major issue for ATC units, where this is above the levels allocated within a Radar Vectoring Area, especially if we are talking of perhaps a 500-foot disparity, or less, and are erring on the side of caution in terms of terrain clearance. Perhaps the ATCOs at the unit concerned were unaware of the flight-deck implications, as described?

Given that the originators or all three reports felt sufficiently aggrieved to write to CHIRP, did they also communicate their views to the ATCOs under whose control they were placed at the time, on the RTF, or formally to the ATC Unit Management, I wonder? If not, why not? Do they have Chief Pilots and Flight Safety Managers whose job it is to follow-up such issues? Did they file MORs with the CAA? The platform-altitude issue for non-precision approaches would certainly have been picked-up by ATS Investigations Department at CAA (SRG), I have no doubt at all.

In conclusion, I say this: we all have a right to complain when we think something is wrong, needs changing or sorting out. But if we don't communicate those views to the right person, nothing will change until it's too late and something goes badly awry.

And finally ...the Captain is ultimately responsible for the safety of the aircraft and its occupants. If the Captain judges that an ATC procedure is unacceptable, be it a late runway notification, an "awkward" platform altitude for a non-precision approach or a rushed

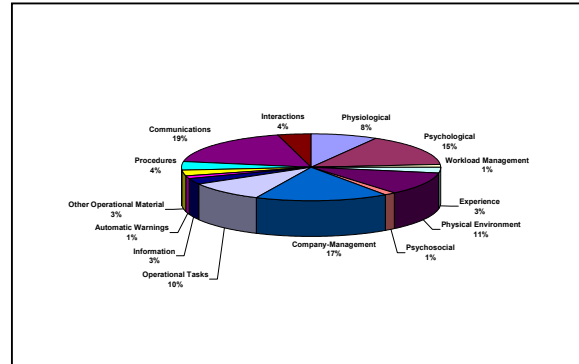
departure then he/she MUST exert his/her authority, inform ATC and then follow it up in the correct manner with his/her company and/or the CAA.

Things can work for the better but only if we all talk to each other!

## FLIGHT CREW REPORTS

Flight Crew Reports received in Period: 31

Key Areas:



### ATIS AWARENESS

Prior to Top of Descent, the Pilot Not Flying (PNF) copied the latest Automatic Terminal Information Service (ATIS) for ### (A major UK airport). LVP's were declared in force. On transfer to ### Director the ATIS we had was declared out of date. PNF collected new ATIS. Little significant change. As we started the approach segment we requested confirmation that LVP's were in force in order to do an autoland. Tower informed us that LVP's were in force but the runway was not protected!!

Whilst this is an extreme illustration, it shows how uncoordinated the ATIS system is at ###. The ATIS is updated every 20 minutes, crews are informed of an update, but are not told of what the change is. It would seem we are expected to go off air and collect the latest ATIS contrary to CAA advice.

A simple "X-ray is latest, no significant changes" would suffice for 90% of the updates. In this case a very significant change was not passed, yet it was presumed by ATC that we had the change which had occurred in the very last few minutes of our descent, just prior to the approach.

*The details of this incident and the omission by ATC were confirmed, but the latter was assessed to be an isolated occurrence.*

*On the more general issue of ATIS updates, any means by which the necessity for flight crews to receive an updated ATIS transmission at a late stage of the*

*descent/approach might be avoided, such as the reporter's suggestion, would be welcomed.*

\*\*\*\*\*

### APPROACH SEQUENCING

At approx 900ft AAL (3 miles out runway ##) we still awaited landing clearance. Tower called taxiing aircraft ABC123 - "Do you see the 747 at 3 miles?" They then cleared the twin jet for immediate take-off (he was in fact still about 200 metres from the runway).

I was flying in the RHS with a trainee Captain in LHS. I warned the trainee to prepare for a go-around. The twin jet eventually rotated as we were below 100ft AAL having been given a "land after" clearance.

This is a classic dangerous example of ATC being "too slick"! In a go-around we would not have been able to see the twin jet and he would not have been able to see us behind him. Our approach speed was 160kts (minimum for the aircraft weight).

What was the controller trying to prove? 747's need space!

*The approach/landing sequencing necessary at some UK airports to achieve runway utilisation targets requires considerable skill on the part of ATC and leaves little margin for error.*

*The circumstances described above are but one view of the situation, but serve as a useful reminder to ATCOs that on occasions pilots may consider the separation to be too tight. If you feel this to be the case, tell ATC.*

\*\*\*\*\*

### WINTER DE-ICING QUANDARY

*Just a reminder that Winter Ops will soon be with us, bringing additional pressures to maintain schedules such as that described here:*

On the evening in question it was winter conditions of snow and low temps. De-icing was essential for all aircraft. ATC (Major European Airport) insisted on using runway ##L for departure, a runway situated over 7km from the parking area resulting in a long taxi time to reach this runway, 20mins in normal conditions is not unusual and with snow and ice this taxi time would increase dramatically. Runway ##L is a new runway and I understand due to environmental pressure is the preferential departure/arrivals runway if possible.

Start-up clearance was only being given for aircraft who were prepared to accept this runway for departure, any aircraft asking for a nearer runway with short taxi times were told to expect considerable delay without reason.

The weather conditions were such that frequent snow showers were passing through. De-icing typically takes

10 to 15 mins from start. Hold-over times in these conditions were at best 45 mins in light snow to 20 mins in moderate snow.

As the airport was not allowing alternative runways for departure, (possibly because they had without thought prioritised this runway for snow clearing, but we were never informed, and if this was the case, why that runway?) crews were being cornered into accepting ##L for departure.

At a push in light snow it might have just been possible to reach the runway within the hold-over time, however, the snow did increase at times into what was moderate snow, and yet aircraft were still taxiing.

I believe that the environmental pressures that the airport operates to are putting safety at risk. I have seen similar problems with runway selection at this airport in the past in crosswind conditions.

Yes, the Captain has the authority to refuse this but it is all too easy when advised of delays to take the runway on offer. I am not suggesting that anyone accepted a departure that they considered unsafe. I believe that an airport should provide the most suitable runway for departures/arrivals wherever possible especially in marginal conditions. This is a form of risk management. The most suitable runway lowers the risk.

I find it unacceptable that an airport can, in marginal conditions, corner crews into using a runway that significantly reduces this safety margin to a level bordering dangerous due to its overriding environmental policies.

*The details of this report were forwarded to CAA (SRG). Subsequently, CAA (SRG) raised the matter formally with the relevant National Regulatory Authority (NA), which undertook an investigation. The NA's investigation concluded that the runway selection was for operational not environmental reasons.*

*If you experience a similar problem, submit a MOR. This should ensure that the matter will be investigated.*

\*\*\*\*\*

### PROCEDURAL SEPARATION - THE WRONG ASSUMPTION

Our flight to ### (Ionian Island) proceeded as expected until we were handed from the Area controller to #### Approach. The crew briefed for a VOR approach, in accordance with the prevailing winds and CAVOK conditions. We were instructed to proceed to the ### VOR and maintain 9,000' and complied. The procedure requires a beacon outbound altitude of 8,000', descending once established outbound to 3,000' by a distance of 12 miles, before the procedure turn.

Our first request was to make a visual approach as we had field in-sight 14 miles from the airport, though this request was denied due to departing traffic. We maintained a visual contact with this conflicting traffic though once reaching the VOR our request for descent was denied as the controller had not yet made contact with the departing traffic. We advised that we were beacon outbound for the VOR approach and that the departing aircraft was to the North and we were now 4 miles to the South. Descent clearance was denied several times until we had 20 miles of separation. Now very high for the procedure but judged that a safe approach was still possible. ATC cleared us to 3,000' at 12 miles and at this time we commenced our procedure turn. It was at this point we received a TCAS alert from two aircraft, both maintaining 7,000' and on reciprocal headings. On command from the Resolution Advisory we climbed clear of conflict, returned and maintained 8,000' back to the VOR. Once at the beacon we were cleared for the approach and landed shortly afterward.

After conversations with the controller, we had discovered that the controller had thought we were taking up the hold and therefore gave us no warnings of the military traffic transiting the TMA. We were given no instructions to take up the hold and made numerous calls stating our position on the VOR radial as part of the initial approach.

The controller was concerned with a potential conflict between the departing traffic and ourselves, though being 8,000' above and proceeding in opposite directions, there was no conflict. I remain unclear why it was assumed that we were in the holding pattern.

TCAS proved its worth once again.

*A good example of how inadequate communication during a procedural approach led to a misperception of the situation. The TCAS intervention prevented what could have been a more serious incident.*

*Be aware that your perception of a situation might not be the same as ATC's. If in doubt, check that it is.*

\*\*\*\*\*

### ROSTER INSTABILITY

During the turnround at ### (Mediterranean destination) the aircraft was refuelled and boarded. I had a nagging doubt about the fuel load being wrong. The inbound and outbound flight times and distances were similar yet the fuel was much lower.

After boarding and door closure I realised that the PLOG EZFW (Pilot Log Estimated Zero Fuel Weight) was 20 TONNES LIGHT. Why hadn't I noticed? Why had it taken so long to realise? Embarrassingly, the refueller had to be recalled after obtaining new figures.

Off duty at UK base at 0100Z. The next day's duty had originally been SBY 1200-1800, this had changed to SBY 1600-2200 on check-in for the above flight and then again changed to a 1300Z ### (Mediterranean destination) on check-out.

The next day on checking delays, I'm informed that I'm now doing a night ### (Canary Islands) at 1600Z leaving (again) no time for rest.

The following day then became a rest day. Following the rest day, my rostered night sectors were again changed due to my high hours.

This Company constantly changes rosters with no regard for fatigue. I put the above refuelling incident down to long term fatigue.

*An analysis of CHIRP reports on the topic of roster instability has shown a significant increase in 2003 and a further increase in the first nine months of this year. In some of the cases reported recently, individuals' duties were changed repeatedly from those originally rostered, often to maintain their flying/duty hours within the maximums permitted.*

*The attention of CAA (SRG) FOD has been drawn to these rostering practices. Notwithstanding this, we are interested to confirm whether the increase in CHIRP reports received this year is indicative of an increasing problem of roster instability in some sectors of the industry, and would welcome additional reports/information on this issue.*

\*\*\*\*\*

### REPORT TIMES

No particular event. I have concerns that my Company does not take the issue of pilot fatigue seriously. As far as I am aware CAP 371 INTENDS a rolling duty hour limit of 55 hours without the interference of the definition of a week. The Company I believe is moving towards a 60-hour rolling limit. The Company has introduced a fatigue survey in an effort to demonstrate its concern but at the same time allows no credit for the actual time conscientious pilots normally check in for a flight in order to obtain flight plans, weather etc and brief adequately. In particular no credit is given for training flights in this respect for briefing and debriefing. These problems are made worse by inadequate briefing facilities and very limited access to company and aircraft manuals which are shared on computers which cabin crew use for hotmail.

*CAP 371 - Fourth Edition, which must be incorporated in operators' Approved FTL schemes by not later than 1 April 2006, specifies that the maximum duty hours for flight crew, excepting helicopters, shall not exceed 55 hours in any consecutive seven days, except in specific circumstances involving unforeseen delays.*

*CAA (SRG) is in discussions with the operator with a view to increasing the report time for crews undergoing line training.*

## **FLIGHT CREW COMMENTS**

### **FREQUENCY CONGESTION**

I refer to the Flight Crew Reports on page 4 of Issue 71 and wish to endorse the reporter's comments about frequency congestion - not just on the Daventry sector, but sometimes on adjacent sectors.

The problem I am now encountering is that certain air traffic controllers issue continuous rapid-fire instructions without allowing a pause between transmissions. Until two or three years ago this was not a significant problem, but it has developed fairly quickly. As soon as an aircraft has acknowledged one ATC call, the controller immediately starts another transmission. I know their workload is high and they have many instructions to make, but sometimes this can happen a dozen times before there is a gap in the flow - it almost seems as if the controller is trying to prove dominance of the frequency.

On a duty day I fly back and forth through this part of the country four times, routing between the South of England and Scotland. I sometimes find that I have almost transited a sector before I have an opportunity to announce my presence. I have to presume that the controller would call me if they needed to issue an instruction - all very well and good provided I've successfully transferred to the correct frequency! And what happens if I want to avoid weather - well so far I've been lucky, in those circumstances I've always been able to speak before I've run into the CB.

I will take your advice and submit an MOR next time it happens.

*In spite of real problems reported through this Programme, as noted in the last issue, there is a lack of hard evidence in the form of MORs that RTF congestion is a significant problem. NATS is investigating technological methods to assess more accurately the problem, but in the meantime it is important to report all instances.*

\*\*\*\*\*

### **MORE ON OFFSETS (FB69)**

SLOPs (Strategic Lateral Offset Procedures) have been recently introduced on North Atlantic routes to mitigate against Flight Level errors, in that procedural environment. UK AIP SUPP 17/2004 refers.

*Supplement 17/2004 permits aircraft that are capable of being programmed with automatic offsets to fly on the centreline or offset 1nm or 2 nm right of centreline when operating in oceanic airspace.*

*Aircraft without automatic offset programming capability must fly the centreline.*

*For other conditions refer to the Supplement.*

\*\*\*\*\*

### **POSITIONING FLIGHTS**

Just requesting a slight clarification on Positioning Flights.

The situation was as follows:

We incurred a one-hour delay for Cabin Crew's 3rd (and final planned) sector returning to the UK from Europe (was Flight Crew's first sector). Ended up holding at UK destination due weather, then diverted to nearby alternate. This put the Cabin Crew into discretion by approximately 20mins.

Passengers were disembarked to make their way by road etc. Cabin Crew were quite happy to stay on aircraft for "ferry" sector to main base, but in the end, the Company decided they could not legally do so, and made them travel by road also.

Our Manuals seem to indicate:

The Cabin Crew can "position" - it is not an Operating Sector, so not an FDP problem (although still on Duty).

No Cabin Crew can be required to perform any "Safety Duties" i.e. they cannot arm the doors, since they are not "Operating".

The Flight is not a "Public Transport Flight".

So is it legal to:

Operate the Flight with the Flight Crew arming/disarming the doors?

The Cabin Crew "positioning", but with nobody to "look after" them?

*The Regulatory position is described below, and would have been applicable in the case above, providing the passengers' baggage was unloaded at the alternate airport and the situation described was not covered by a more restrictive Company Staff Agreement.*

With regard to the question re positioning of Cabin Crew, if the flight crew undertake the necessary safety duties, then as company employees the need for operating Cabin Crew does not arise.

A previous Policy Statement addresses this issue:

"If the only passengers on board are company employees and no freight is carried other than 'company' freight, then it is not a public transport flight and therefore does not require to carry a cabin crew member to 'look after' the passengers as required by Article 20(7) of the ANO."

However if an Operator requires a Cabin Crew member to carry out safety duties, then that duty will be accountable as part of that crew member's FDP.

# CABIN CREW REPORT

*This report was published in the most recent issue of CABIN CREW FEEDBACK and is reproduced here for information.*

## DO NOT DISTURB!

Extremely early report - 0300GMT. Thirty minutes into flight there was a request from the flight deck for a blanket, and then I got a call from the F/O to say they were not to be disturbed for 1½ hours. I said that I could not comply with that request as I was obliged to make checks every 20 mins and said if they did not want to be disturbed the only option would be to unlock the flight deck door so that we could make visual checks. They rang back a few minutes later and said we should carry out our calls as per normal!

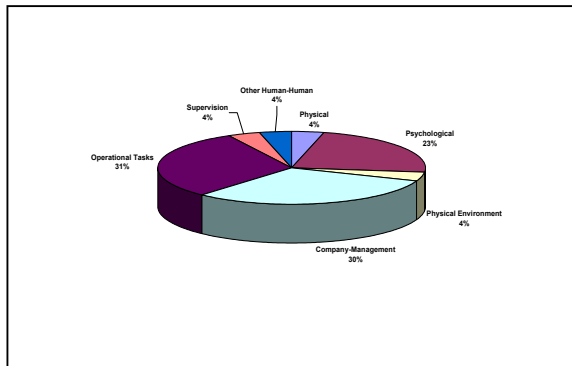
I am an experienced cabin crew member; would a less experienced In Charge have stood their ground?

*The reporter was right to insist that the SOPs were adhered to. It is worth bearing in mind that SOPs of this nature are there to check for pilot incapacity and their wellbeing, not just for refreshments!*

# ENGINEERING REPORTS

Engineering Reports received in Period: 11

## Key Areas:



## MANNING

I am writing this in the hope that CHIRP can bring some resolution to the ongoing manpower shortages at my place of employment. This has been an ongoing problem for several years, indeed the CAA yearly audit continually issues non-conformances due to the manning levels; yet the levels are ever decreasing whilst the workload escalates. Recently the manning levels have reached a point where I believe the threshold has been crossed and become dangerous.

An example of this would be one person on a day shift (12hrs 7am-7pm) with over 30 aircraft movements.

Another example would be two persons on a night shift with up to seven night-stopping aircraft. These two people would be expected to perform routine maintenance, special inspections, defect rectifications, towing, security sealing, troubleshooting, progress deferred defects and stores duties.

The Company have tried a number of methods to boost the manning levels without using the most common sense method, i.e. employ more staff locally. Firstly, overtime, the old tried and tested method, the problem now being faced is that after your four-day shift, staff have had enough and don't want to give up their days off. Secondly, staff were seconded from our main support base; this worked well but disappeared after a few months. Now we have supposedly a system whereby staff from base cover the shortfall on overtime; this quite simply has not materialised, leading to the present dilemma.

Another problem being faced is the availability of avionic cover, again another continual CAA audit non-conformance. The lack of avionics personnel is placing another burden on already stretched resources, indeed staff with an avionics extension are having to use it to the fullest extent. This in itself is not a problem but the B1 staff workload is already high enough without this additional responsibility.

A problem that has been highlighted by the use of staff from other bases is their non-familiarity with our local procedures and practices. This could simply be from not knowing the stand layout of the airport, or not having a driving permit therefore cannot reach the more remote stands. Another issue is the Stores, some seconded staff have simply never worked at a base that doesn't have dedicated store-persons. The requirement to educate staff often leads to the local staff having to deal with stock issuing themselves as with the pressure of time it's simply quicker to do it yourself than explain how it works. Once again, more pressure is placed on the local staff.

The issue of security-sealing aircraft has for some unknown reason been decreed an engineering function. This is in contrast to recent DfT procedures stating that many people can seal/unseal the aircraft. Indeed the aircraft dispatchers have employed extra personnel due to security reasons yet refuse to take any part in the security of aircraft. This is in total contrast to our Dept who have only received further and further instructions on company security procedures demanding more and more time on each aircraft to comply with. The ridiculous number of telephone calls requesting access for catering, cleaning etc is in no small way a constant distraction which at times becomes overwhelming; it is now blatantly clear that my primary function is not an aircraft engineer but a security guard.

The pressure being placed on the engineering department by supporting functions is just unbelievable. The contract aircraft handling company are just completely failing to meet the contract requirements mainly due to staff shortages. This ranges from not being able to supply steps to access aircraft, not supplying ground power, towing aircraft at a time they dictate at night. Altogether with the musical stairs scenario i.e. stairs were there when I looked around but gone when I look back, we are simply losing hours and hours of time. Again, an added pressure which is utterly frustrating but completely out of our hands, there is a severe shortage of Stands leading to a ridiculous number of towing requests.

To summarise, the Company have made no commitment to employ the required personnel always defending the manning levels by stating it was a seasonal high. With recent permanent changes to the operation this defence can no longer be used.

*The Operator was approached and asked to respond to the various points made. This they did with a very full reply that was forwarded to our reporter. The main responses made were:-*

- *A further review of staffing is being made following the recent operational changes.*
- *Avionic recruitment is on-going.*
- *Manning is being backed from Base both temporarily and by secondment. However, DfT pass requirements did hamper this process and delayed staff positioning.*
- *Stores are required to be picked up from Security points is the main outstation difference.*
- *Security-sealing is being contracted out.*
- *An 'Improvement notice' has been served on the ground handling company.*
- *The CAA has accepted the responses to its audit findings albeit some points remain outstanding.*
- *With regard to recent Security and DfT requirements, timescales given have been "unrealistic" and have caused problems.*

\*\*\*\*\*

### PRESSURE TO DEFER DAMAGED FAN BLADES

Carrying out line maintenance on a foreign registered and owned aircraft at my home station the subject aircraft has been with us for some time and we have slowly built up a good relationship with crew and airline's representative. The aircraft is new and has suffered from only the usual minor day-to-day defects.

During a pre-flight inspection my avionics colleague called me to the aircraft to look at some fan blade

damage. I confirmed the damage and on referring to the Maintenance Manual found that two damaged blades were out of limits.

On contacting the airline representative, who is also a licensed engineer, and informing him of the defect and that effectively the aircraft was now AOG pending replacement of the blades, his first reaction was to ask me to ignore it and "find it later on" as this would cause great expense to the airline and disruption to the schedule. I said I appreciated his predicament but I had made reference to the manual and the damage was not marginally out of limits but almost twice as much and with this information there was only one course of action available. He again reinforced the problems it would cause and again asked me to sign it off or ignore it.

The aircraft had been on the ground since the night before and had been subject to an arrival check and a daily inspection but had been missed by the duty engineer during those inspections possibly because of the fan on this engine type (CFM 56-5B) having a tendency to turn even with a moderate wind blowing and the effects of twilight. That said, we did spot it and this confirms that the "system works" in this type of inspection process. However, once he had accepted that I wasn't going to be swayed and that the aircraft was going to remain AOG until the blades were replaced the recrimination started. Why had it been missed on the daily inspection?

The airline representative continued to ask this question throughout the day and apportion the delayed aircraft and disruption to their schedule on this point. The operator continued to argue regarding purchasing a set of blades and it was this indecision that compounded the delay. We were felt to be the cause of the problem in their eyes for not spotting it earlier.

In many years of aircraft maintenance I have never felt so pressurised into ignoring or signing off work outside of the limits. Thankfully, my company does not have this culture. What amazes me is that this pressure and willingness of some in our industry, albeit a foreign operator, is prevalent and common enough to feature repeatedly in CHIRP. How many hull losses will continue to happen because of this crass disregard for safety?

*Both the Engineer and his Company are to be congratulated on standing their ground on this important safety issue.*

\*\*\*\*\*

### PRESSURE TO GO?

I am a certifying base maintenance engineer - working for a Regional operator.

I raised recently an ASR that highlights the effects of commercial pressure on flight crew.

Another operator contacted us about damage to one of their twin prop aircraft, inbound to the station. The pilot ignored all advice and was more concerned with getting his passengers loaded than the state of his aircraft. Two holes were evident in the fuselage in line with the propeller; threaded indentations indicated a bolt had been shed from somewhere.

As we do not handle this operator and have no technical authority I contacted the company Operations department. However, they replied they could not do anything about preventing the aircraft departing if the Captain decided to take it. This he did after the passengers had all been loaded.

*Determining the origin of the bolt-type item that had caused the indentation might have resulted in other serious safety implications had a proper investigation been allowed to take place. It is understood that the operator did take appropriate action following this incident being reported but subsequent to the flight.*

## ENGINEERING COMMENTS

### IDS - SOME FURTHER COMMENTS

(1)

Some way needs to be found to establish the identity of all personnel in the vicinity of aircraft - this is in the interest of safety in the broadest sense and must be pursued.

I find myself agreeing with the obvious frustration expressed by the two responses printed in Feedback Issue 71, but very disappointed (although not very surprised) at the reaction from DfT.

The DfT view demonstrates a total lack of experience of conditions to be found when working on aircraft and a very blinkered view of the hazards to be encountered. Your two respondents show a clear recognition that it is the loose pass that presents the greatest hazard to aircraft safety. The DfT seems to believe that the ID pass is the only way in which a person's identity can be established and continues to look for ways in which their belief can be supported.

Perhaps this is another example of rules being set by those with little or no practical experience of the subject - this seems to reflect the general trend in today's society at large and I for one find it most regrettable.

Has anyone actually asked the people concerned how they might address the problem?

\*\*\*\*\*

(2)

I have worked at many UK as well as other European Airports and met my fair share of unhelpful security guards. I would like to quote some sections from the Pass Holder Handbook from ### Airport:

"Section 1.12 - Regulations For Pass Use" states, as expected, that an ID card must be visible (at chest height) when Airside and/or in a Restricted Zone (RZ); no surprises there!!

"Section 1.18 - The only exemptions, apart from Control Authorities, to this legal requirement are:-

- Aircraft Loaders
- Aircraft Engineers
- ### Airport Ltd Engineers

While in ACTUAL performance of their duty for which the exemption was granted"

At last!! An Airport Authority that ACTUALLY recognises that personnel such as Loaders and Engineers could cause FOD hazards while working on or around aircraft by having their passes on view and may keep their pass in a secure pocket or under clothing etc but MUST be able to show it upon request.

### is under DfT regulations; why can't there be a little common sense about all this? We've all got a job to do, we're all under pressure, come on DfT give us all a break, ### have!!

*In response to the comment above, the DfT replied as follows:-*

1. We have not been presented with an insurmountable case which dictates that the display of passes creates a problem. When worn, for example, in a transparent armband, why would the passes or those wearing them "fall into the aircraft" or make such an occurrence more likely?
2. Whilst it is not clear which airport we are talking about, we have issued no exemptions. We are unaware of the local rule referred to, which appears illegal anyway. I shall ask our inspectors to investigate.
3. There is no requirement to display more than the one pass issued or recognised by the manager of the aerodrome in question so I am not sure what the problem is here.

Thus we have no plans to revise what we would argue is an entirely logical security measure at present but I would be grateful for any further clarification you could offer on the points raised above.

*DfT have invited a case to be made for them to review their present policy. CHIRP will be only too pleased to make representations on this issue. However, we do need your input as to why the present requirement to make passes visible at all times by, for example, the*

wearing of clothing with transparent pass holders, is not practicable when working on aircraft. More reports please!

## ASRS - 'CALLBACK' REPORTS

*This report is reproduced from Callback Issue 297 - June 2004*

### ESCAPE SLIDE NRV

ASRS received a report from a maintenance technician who, upon completing an engineering service order to install wing escape slide check valves on a B757-200, learned that he had, "...installed the one-way valve on the air hoses backwards." The reporter claims that, "...the paper work for the job did not have any pictorial diagrams which would indicate airflow and therefore check valve direction." The technician alleges that the only available illustration is contained in the parts catalog which is not normally used as an installation guide. Three other slides that the technician worked on have been recovered and corrected. Further, checking and recovery efforts were continuing.

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

The following CAA (SRG) ATS Standards Department ATSINS have been issued since August 2004:

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 48 - Issued 9 August 2004

Introduction of New RTF Phraseology Relating to Aerodrome Helicopter Operations

### Number 49 - Issued 11 August 2004

Change to Phraseology to be Used When Issuing Avoiding Action

### Number 50 - Issued 17 August 2004

Definition of Terms Relating to Aerodrome Helicopter Operations and Changes to Phraseology Published for Use by the Offshore Aeronautical Service

### Number 51 - Issued 24 September 2004

Managing Estimated Off Blocks Time (EOBT) of Flights Departing UK Aerodromes

### Number 52 - Issued 28 September 2004

Introduction of SAFETYCOM (135.475MHz)

### Number 53 - Issued 30 September 2004

Runway Incursion Prevention - Briefings for Aircraft Operators

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

The following CAA (SRG) FODCOMS have been issued since August 2004:

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

### 16/2004

1. Operators' Technical Log Sector Record Page and Other Required Documentation - Changes to the Certificate of Release to Service

### 17/2004

1. Information Sources for the Preparation of a Minimum Equipment List (MEL)
2. Rectification Interval Extensions
3. FODCOMS Relating to MMEL/MEL Items

### 18/2004

1. Letter of Intent: Proposal to Amend the Air Navigation Order 2000. Proposal to Amend Schedule 4 of the Air Navigation Order 2000 for the Purpose of Introducing Changes to Operational Equipment Requirements for the Carriage of a Means of Indicating Outside Air Temperature and for the Carriage of An Emergency Locator Transmitter (ELT).

### 19/2004

1. Introduction of 'Prevailing Visibility' in Meteorological Observations, Forecasts and Reports.

### 20/2004

1. Air Operator Certificate (AOC) Documentation
2. Staff Changes within the CAA Safety Regulation Group
3. Distribution of Flight Operations Department Communications (FODCOMs)

### 21/2004

S76 Helicopters - Rejected Take-off Manoeuvre Practice

## CAA (SRG) CAP 747 - MANDATORY REQUIREMENTS FOR AIRWORTHINESS

Issue 2 September 2004 - This publication provides a single point reference for mandatory airworthiness information and airworthiness directives for civil aircraft registered in the UK. In particular it includes those mandatory items previously issued as Airworthiness Notices.

## CHIRP SURVEY

The 2004 Survey followed a similar format to that conducted in 1999 in that survey forms were distributed to all user groups with the FEEDBACK newsletter and a separate survey of airline and ATC managers undertaken.

### User Group Results and Comments

The User Group responses are detailed in Table 1; these re-confirmed the results of the 1999 Survey with 99% of respondents stating that CHIRP made a positive contribution to flight safety.

**Table 1 - Flight Crew/ATCO/Engineer Responses**

Does CHIRP make a useful contribution to the promotion and improvement of flight safety?	99%
Is the availability of an independent confidential reporting programme a good idea?	99%
If you have reported a safety-related matter or concern to CHIRP, were you satisfied with the outcome?	66%
If you have not reported a safety-related matter or concern to CHIRP would you consider it in the future?	86%
Does the newsletter contain information that is useful to you?	97%
Does CHIRP provide an independent approach on reports?	96%
Would the publication of more information on analysis/trends be useful?	75%
Is the present style/format appropriate for the content and easy to read?	93%
<b>Overall approval rating</b>	<b>91%</b>

While the survey indicated a high approval rating among respondents, of the 15% who had submitted reports only about 2/3<sup>rd</sup> were satisfied with the outcome. The principal reason for not being satisfied was that CHIRP had been unable to effect an improvement in relation to the particular issue reported. This same criticism, that CHIRP is ineffective in driving change in the industry, was made in other comments. Other criticisms of the Programme expressed in comments were, that on occasions "weak" or "management-oriented" responses to reporters' concerns were published in FEEDBACK and CHIRP permitted "bland" responses from third-parties to be published. Also, more feedback on actions taken by the CAA and other third parties in response to reports was requested.

In relation to the first criticism, as was pointed out in the last issue, we have no executive authority and our role is to highlight safety-related issues to the relevant organisation whenever possible and to publish these together with any corrective actions that we are apprised of. Notwithstanding this, we do whenever possible, seek to persuade organisations of the need for change. The Trustees and the Advisory Boards have reviewed this and the other perceived shortcomings with the objective of identifying areas where we can implement changes to address these points.

A number of useful suggestions for improving FEEDBACK were also received. These are currently being evaluated and some will be implemented in the next issue.

### Management Survey Results and Comments

With two exceptions, the responses from airline and ATC managers were positive. The principal suggestions for improvements related to the presentation of data and information to managers. These are being investigated.

**Table 2 - Airline/ATC Managers' Responses**

Are you in favour of an independent confidential reporting programme being available?	96%
Are you familiar with the Advisory Board process for reviewing reports?	71%
Does the Board review process provide a balanced perspective on issues?	81%
Do you receive an advance copy of each issue of FEEDBACK with an accompanying letter from CHIRP?	91%
If YES, is the additional information sometimes included in the accompanying letter useful?	83%
Does the letter contain safety-related information that is useful to you?	87%
Is the present style/format appropriate for the content and easy to read?	91%
<b>Overall approval rating</b>	<b>87.6%</b>