

CHIRP FEEDBACK

Issue No: 102

2/2012

EDITORIAL

In 1996 when the Trust was formed to manage the Aviation Programme, Kirsty Arnold joined the organisation as Administration Manager. Later in 2001 when the Programme was extended to cabin crew members, Kirsty assumed the additional responsibility for the management of the cabin crew element.

The success of all of the CHIRP programme elements and, in particular the Cabin Crew Programme, has been due in no small part to Kirsty's outstanding commitment and her quality of work over more than fifteen years.

The Trustees and I greatly appreciate Kirsty's contribution and were pleased to learn that she has been offered, and accepted, an opportunity to further her career in cabin crew safety management. We wish her continued success in her new role.

Consequent to Kirsty's departure, the Trust is inviting applications for her role, a profile for which is summarised on Page 8.

Peter Tait

CORRECTION:

ISSUE 101: PAGE 5 - UNEXPECTED AIRFIELD CLOSURE

In the last issue we published the above titled report which involved an airfield closure during which a low altitude air-to-ground photographic task was undertaken.

The CHIRP comment accompanying the report noted that the CAA had confirmed that no Rule 5 (Low Flying) Exemption had been sought or issued; this was based on a statement from the CAA to that effect.

Subsequent to publication of Issue 102, the CAA advised that the information provided to us had been incorrect; a Rule 5 Exemption had been issued for the activity described. We are grateful to the CAA for acknowledging their error and apologise for the publication of incorrect information.

ATC REPORTS

COMMENTS ON FEEDBACK ISSUE 101 (1)

Report Text: As a professional ATCO who has been in this profession for 38 years and a CPL/Flying instructor/Examiner I am appalled at some of the RTF phraseology issues highlighted in FEEDBACK Issue 101.

Page 3: Flight Crew Report - Conditional Clearance.

The reporter advises that he was instructed to "Line up after the landing light aircraft". If any ATCO here issued that instruction I would cancel their Tower ticket immediately! The correct instruction is "After the landing light aircraft line up and wait (runway designator

optional)". The order is VERY specific and highly important; 'condition' before 'instruction'. The ATCO concerned was also clearly not paying attention by failing to cancel the red stop bar when the condition was, or was about to be, fulfilled.

Page 4: Flight Crew Report - Amended Clearance (1)

The instruction which was apparently given (but misheard) of "climb straight ahead to 2,000ft" is misleading and dangerously ambiguous.

The options are "Climb straight ahead, maintain altitude 2,000 ft on reaching" (I would suggest that the QNH is reiterated if the previous clearance was to a FL)

OR "Climb straight ahead until passing altitude 2,000ft before turning on course".

Both of those are clear and would have prevented the confusion in this instance which, fortunately, did not result in a level bust.

Page 5: Flight Crew Report - Amended Clearance (2)

The number of occasions on which I hear exactly this error by ATC is, frankly, disgraceful. It occurs with daily, probably hourly, regularity and ATCOs then castigate flight crews for failing to observe the restriction which they have implicitly cancelled.

CHIRP Comment: The reporter's comments on the importance of correct RTF are correct and this issue contains several other reports/comments on this topic.

In relation to the first comment, in the last issue we concentrated on the stop-bar issue. It is important to remember that the text we publish is the reporter's recollection of an event/incident and thus might not be an accurate recollection of the precise ATC phraseology.

Also, as we noted in the previous issue, the incident to which the second comment refers involved a non-UK Air Traffic Services Unit.

(2)

Report Text: With reference to FEEDBACK Issue 101, Page 5 - Amended Clearance (2) it might pay to point out that the quoted MATS paragraph is correct for UK NATS airspace but is most definitely NOT correct in many other countries' airspace.

For example in French airspace any 'direct' re-clearance into a Paris airfield that is then flown without complying with the (now) abeam level restrictions will result in a very unhappy ATCO.

Yet another example I'm afraid of the Brits being way out of step with ICAO procedures, and so introducing confusion.

It is long past time for the CAA to adopt worldwide standard RT phraseology, and cease changing internationally agreed procedures 'because we know better than anyone else.

CHIRP Comment: The CAA policy, in conjunction with NATS, is to review progressively all cases where UK RTF phraseology differs from ICAO with the intention of reducing

www.chirp.co.uk

FREEPOST RSKS-KSCA-SSAT, CHIRP, 26 Hercules Way, Farnborough GU14 6UU (UK only)

confidential@chirp.co.uk

the number of differences to only those where a compelling safety case supports the difference.

In this particular case, the CAA phraseology, as detailed in the UK AIP and MATS Part 1, is compliant with ICAO PANS - ATM 11-23 [11.4.2.6.2.5 - Level restrictions issued by ATC in air-ground communications shall be repeated in conjunction with subsequent level clearances in order to remain in effect].

In relation to differences in other States, such as that quoted above, work is ongoing within ICAO to amend the relevant phraseology to clarify when prior restrictions continue to apply and when they do not. It is anticipated that this will be promulgated in 2013.

ENGINEER REPORTS

"RESTRICTING AUTHORISATION SCOPE" (FB 101) - A COMMENT

Report Text: A comment on the report from an engineer in FEEDBACK 101 - Page 3 "Restricting Authorisation Scope".

I was astounded to read this report; to me this suggests possibly an arrogance, and lack of knowledge of the licensing/ authorisation regulation. I would be hesitant to recommend an engineer with this attitude/lack of understanding of the approval process. Surely the company approval document clearly states the level and scope of approval? I have been in the industry for more than 30 years, working at all levels between fitter and senior management, and have been subject to restricted approvals on occasion. In my experience the majority of complaints with regard to restricted approvals are based on financial considerations rather than concern over being over qualified for the approval given. That said, I am aware of a large number of engineers who genuinely wish to help the company and who accept approvals without demanding further pay awards.

Lessons Learned: I would suggest that the Part 147 organisations which are training the new licensed engineers ensure that the "newbies" are aware of all their responsibilities and do not expect to be given a blanket approval just because they have "the type on my licence".

CHIRP Comment: A Part 147 training organisation may not be involved in the process of qualifying someone for an engineer licence under Part 66. A full approved course may be undertaken through a Part 147 organisation and the syllabus does include some aspects of study of the EASA requirements. A Part 147 organisation may only cover the theoretical training (in full or by modules) and issue the prospective licence holder with a certificate for the exams taken. There remains a self-study route to the licence where no 'formal training' may be given.

The Part 145 organisation is required to ensure that all employees, and particularly certifying staff who are to be authorised, are aware of the company authorisation system. That includes the means of determining competence as the licence alone, whether type rated or not, does not cover all of the requirements to be met. The Part 145 organisation is obliged to ensure that 'differences' training is provided where the aircraft

configuration differs from the training on type that the individual received.

The licence is only a reflection that the individual has met a set of minimum requirements at a point in time. As with all qualifications, it has its limits as it does not confirm ongoing recency or competence, both of which are addressed by the authorisation process. The scope of authorisation may accordingly be limited at the discretion of the Part 145 organisation issuing the authorisation.

ENGINEER TRAINING

Report Text: I am contacting you about my son's college training course for an engineer's licence. He is concerned about the legitimacy of the course and also that the syllabus is not being fully covered. A lack of personnel for lessons has slowed progress down, particularly at the start of terms. Also, the log-books for work experience have not been issued by the course instructors and the students are being prevented from completing them.

Would it be at all possible to have the college and its credentials confirmed before my son is left without the necessary qualifications or that the course and its promised prospects for future employment are proved unfounded?

I realise that times are very hard for the companies running these training courses but equally my son has invested a large amount of time and money to gain an engineer's licence, so it would be nice to allay his troubles and concerns.

Hoping that you can assist.

CHIRP Comment: The reporter's concerns were discussed with the CAA and also the organisation on behalf of which the college was providing the training under the organisation's Part 147 approval. The CAA elected to visit the training college and the organisation initiated a quality audit of the training.

Subsequently, the reporter advised as follows:

The impact of the CAA visit has already been extremely positive; the college has given the students their log books, and also has employed two new members of staff. This can only be good news!

I'm relieved CHIRP has survived all the closure threats, it is an essential tool in today's highly pressured industry where cost is everything and company 'safety cultures' seem to be only made up to pay lip service to authorities

CHIRP Comment: We were pleased to assist by passing this report to the relevant organisations and thus facilitate the actions subsequently taken.

FLIGHT CREW REPORT SUMMARY 2010-11

The following is a summary of the confidential reports received from flight crew in the 12-month period from 1 November 2010 to 31 October 2011.

In the 12-month period to 31 October 2011, 103 flight crew reports were received; a reduction of 14% compared to the number received in the previous year (120).

Company Policies – Reports involving an aspect of company policy was the most frequently reported category for the second year running but the number of reports in this category reduced (48 issues compared with 66 in the previous period). The principal company policy issues reported during 2011 were:

1. Roster/Scheduling Policy (29 reports) - Reports in this category involved 10 operators; however, in the case of six operators only one report was received whereas 12 reports (40%) involved the same AOC Holder from which 66% of the roster/scheduling reports submitted in 2009-10 had been received. In the first half of this period the reports involving this operator suggested that the company was continuing to experience crewing difficulties similar to those raised in 2009-10; reports alleged manipulation of report times/turnround times by the company to ensure that planned schedules could be theoretically achieved within the Maximum FDP, whereas in practice Discretion would be required. The situation changed in the second half of the period; almost all reports from this operator (and one other AOC Holder) were related to the contracting of cadet pilots, employed by third-party agencies. Two main areas of concern were raised: the first was that there was no apparent provision for leave for a period of up to a year under the third-party contracts; the second was the reluctance of cadets to report under the company's Fatigue Risk Management System those occasions on which they were unfit to carry out a duty. Reporters suggested that the latter was due to a fear on the part of individuals, who had incurred significant debts associated with their training, that if they reported 'fatigued' they would not be selected for permanent employment with the company. Reporters also raised concerns about the competence of some junior First Officers, several of whom continued to be employed under the contract after failing to meet the company's selection criteria for permanent employment. Specific duty/roster issues are detailed below under Duty
2. Senior Management Changes/Policy Changes (6 reports) - Four reports in this group alleged that policy changes introduced by senior managers with little or no previous aviation management experience had raised flight safety related concerns among the flight crew communities and had increased the risk of a serious human error incident; in one case, the level of distraction had led to an error by the reporter. These reports involved two operators. A further two reports involved a change in policy related to an operator's Drug/Alcohol Testing policy that was allegedly introduced unilaterally by the management. The matter was discussed with the Flight Safety Manager and subsequently resolved by the company following discussions with representatives of the pilot workforce.
3. Dissemination/Retrieval of Operational Information (5 reports) - Problems associated with the increasingly widespread use of on-line briefing/company intranet facilities by several UK operators continued to be reported this year. The principal areas of concern were a lack of training in the use of new/upgraded software and difficulties associated with the downloading of essential operational information in the time available for this task prior to flight. As last year, the limited availability/serviceability of hardware (computers/printers) was cited. Three operators were identified in these reports
4. Company De-icing Policy (2 reports) - As in previous years, two reports queried the de-icing policy of another

operator during winter operations. Each report alleged that an aircraft operated by a non-UK operator had departed from a European airport with a significant amount of contaminant present on either the fuselage or wings.

5. Flight Crew Members over 60 Years of Age (2 reports) - Two reports queried an operator's policy in relation to the number of flight crew members permitted to operate in an augmented crew. Reporters alleged that more than one individual aged over 60 years of age was routinely rostered for such duties. The advice of the CAA was sought; it was subsequently confirmed that extant policy for commercial air transport multi-crew operations was that only one pilot aged over 60 years of age was permitted as operating crew.

Communications – The number of issues relating to external communications (25 reports) was similar to the previous year. The number of issues regarding company internal communications increased from 17 in the previous period to 23.

1. External (Flight Crew/ATC). Ten reports related to External Communications involved issues also directly related to Air Traffic Management; these issues are discussed under Air Traffic Management below. Seven reports in this category detailed examples of poor RTF phraseology, involving both pilots and ATCOs. One example of inappropriate RTF phraseology by pilots included an abbreviated message by a non-UK crew that led to a misperception as to the aircraft's position in the approach sequence and a loss of situational awareness by the crew of a following aircraft. In the case of ATC, examples included a lack of clarity in the reporting of the runway braking action by the use of the phrase "Good; unverified" in response to a pilot query as to the braking action shortly after a landing overrun incident had occurred, an allegedly overly aggressive attitude to pilots, whose first language was not English and omitting to notify a descending aircraft of the QNH. Other reports included a misheard revised clearance issued by a non-UK Air Traffic Services Unit in conjunction with a take-off clearance (MATS Part 1 does not permit this) and further comments on the distraction caused by the use of 121.5MHz by GA pilots making Practice PAN calls. Three reports involved a survey undertaken by one AOC Holder as to whether CHIRP continued to make a useful contribution to flight safety.

2. Internal (Management/Crew). Unlike 2010 when reports relating to internal communications predominantly involved one UK AOC Holder, the total of 23 reports received during this period involved 9 UK AOC holders and two non-UK operators. This change in the reporting trend suggested that senior management changes within the company concerned during the first quarter of 2011 had positively influenced the perception of line pilots in relation to communications between senior managers and flight crew. Of the total in this category, 13 reports were related to the communication of company policies; several of these issues have been discussed under 'Company Policies' above. One other significant issue in this category was the perceived lack of information provided to employees following statements released to the Press regarding the future of a UK airline and possible mergers/ acquisitions. This same issue has been raised previously in relation to other mergers/acquisitions involving UK operators and merits closer scrutiny to ensure that uncertainty among individuals as to their future employment does not reach a level that could adversely affect operational safety standards. Other issues included a lack of communication in relation to a company procedure for the carriage of Class

'A' drugs on behalf of the UK Border Agency and poor internal communication of the policy for pre and post flight crew briefings. One report involved inadequate communication between two pilots undertaking a positioning flight that led to an incorrect take-off thrust setting; a second highlighted the increased opportunity for error by a change in an operator's Standard Operating Procedures that added the words 'for take Off' in the pre-departure 'Cabin secure' check; the latter was referred to the company concerned.

Duty – The number of reports related to an aspect of flight duty/Flight Time Limitations (21) received was less than the previous year (35) and continued the trend since the publication of FODCOM 10 (2009) which clarified a number of the issues that had been raised previously through this programme. Reports in this category involved nine UK AOC holders; eight reports involved one UK operator with a Fatigue Risk Management System. In comparison to previous years, there have been fewer reports related to individual's roster patterns. Two themes were apparent from this group of reports; the first involved the scheduling of some long haul flights and the second related to roster disruption involving one operator.

1. Rosters/Rostering (15 reports). This group of reports indicated poor rostering practices; five reports involved the same operator from which 50% of the reports in this group submitted in 2010 had originated. Specific issues were similar and included scheduled turn round times allegedly reduced significantly to avoid the planned schedule requiring discretion (In one case no allowance for turn round), the scheduling of minimum rest periods following a schedule that was frequently subject to delays and attempting to extend an FDP in flight by invoking a Level 1/2 FDP extension. Other reports in this group included concerns at a company practice of attempting to 'buy back' a day off for an overnight duty when the individual concerned was notified with insufficient time to gain any significant pre-duty rest; rostering individuals for an FDP, who had insufficient hours to complete the duty, on the basis that a crew change would be required; rostering of days off overseas during an extended charter operation.

2. Length (6 reports). This group involved the scheduling of UK-Caribbean-UK flights by two operators, comprising the use of a Level 2 Variation followed by an intra-Caribbean positioning flight. The principal concern was that the scheduled flight duty/duty periods could not be achieved. Routine delays due to disembarking, crew baggage pick-up and the subsequent local flight led to extended duty periods reported up to in excess of 20 hours. These long duties followed by relatively short rest periods led to reportedly elevated levels of tiredness on the subsequent return sector to the UK. In two cases, the operating crew member reported falling asleep at the same time as the other crew member(s) was taking in-flight rest.

The other principal duty-related issues are discussed under Company Policies above.

Airports - Operations/Infrastructure - Of the total of 15 reports in this category, 12 reports involved airport security and are discussed under that heading. Two reports expressed concern at the ongoing situation regarding the assessment of contaminated runway surfaces at UK airports in comparison to other European airports. One report queried an operator's procedures for handling passengers who had become ill on an inbound flight to a major UK airport and remained in transit with

the intention of boarding a subsequent flight. The report was submitted to the operator and the company procedures were subsequently amended.

Security – The number of security related issues was similar to the previous period (15 reports compared with 14). Concerns about potentially stressful experiences arising from the security screening procedures for flight crew members at some UK and overseas airports continue to be reported for the fifth year running. The principal concerns remain as previously; inconsistencies between security techniques at the same airport, the significant variation in search standards nationwide, allegations of aggressive behaviour/targeting of individuals by a small number of security staff and no effective complaint procedure being available to uniformed crew. In the second half of the period, five reports cited specific examples of individuals being subjected to inappropriate body searches, following the introduction of revised DfT guidelines relating to 'belt searches'. One report detailed a low speed rejected take-off, which the aircraft commander attributed to allowing himself to become distracted by an earlier altercation with airport security. The HMG proposal to transfer the oversight of security to the CAA, if implemented, should permit a better balance to be achieved between security and flight safety in cases where both are involved than is currently the case.

One report raised security concerns at the apparent lack of an effective chain of custody for the carriage of Class 'A' drugs on behalf of the UK Border Agency; this is being followed up with the operator concerned.

Air Traffic Management – The number of ATM related issues reported was similar to 2010; all involved the level of service; no traffic separation issues were reported in this period. One example was the reported practice at one UK ATSU of issuing amendments to departure clearances to crews after being cleared to 'Line-up'. In the case reported, this had occurred after the flight crew had accepted a 'Ready Immediate?' query from ATC. A second example was a flight crew query as to the applicability of published Standard Arrival (STAR) altitude restrictions following an ATC re-clearance. The Advisory Board discussion suggested a possible lack of understanding among some members of both the ATCO and flight crew communities; a clarification of Manual of Air Traffic Services - Part 1 policy was duly published in FEEDBACK. Continuing concerns were expressed about the current policy regarding the reporting of contaminated runway states by ATC in comparison to the information provided in other States, as also noted under 'Airports' above; the provision of additional information to assist pilots in determining whether it is safe to land appears to be eagerly awaited.

Relationship management – This category comprised seven reports, a slight reduction on the previous period (10). Two reports relating to the uncertain future of one UK airline are discussed under 'Communications - Internal' above. The remaining reports raised two concerns. The first involved a perceived bias on the part of a new senior management team towards increasing the efficiency of a rotary wing operation at the expense of maintaining good relations with the pilot workforce. The second was the perceived deterioration in the relationship with senior managers in one UK airline as a result of an ongoing industrial relations dispute; the reported concerns included prolonged discussions with flight crew members causing distractions during their pre-flight preparation and one case of a senior manager making inappropriate comments

about flight crew to cabin crew members in the presence of passengers during a long-haul flight.

Pressures - Six reports were related to some form of pressure that the reporter perceived. Two cases involved UK licensed pilots contracted to operate non-UK owned/registered corporate aircraft. In one case, the reporter was placed under pressure to operate an aircraft with a recurring brake defect and subsequently to fly a charter to a UK destination over a distance that was not legally achievable by the aircraft type. Following an en route diversion, the pilot's contract was terminated. In the second case, the pilot was placed under pressure to fly a foreign registered aircraft, which was overweight and did not have the required legal documents, including Technical Log and Wt & Balance information, or the appropriate navigation database for the intended route. After delaying the flight for several days for the required information, the pilot's contract was terminated on completion of the delivery flight to the new owner. Details of both aircraft were made available to the DfT Aviation Sector and also discussed with the British Business and General Aviation Association. A third report involved a different type of pressure, namely that resulting from a poor standard of driving by contracted taxi drivers engaged in pre and post-flight positioning of flight crew members.

Handling/Operation - The most significant issue in this category was a non-standard departure involving a UK scheduled flight that allegedly flew over a major conurbation significantly below 1,000ft. The alleged incident involved a senior captain and there was a marked reluctance to report the matter directly to the company. The incident was referred to the senior flight operations manager of the company and the subsequent company investigation validated the allegation. A second issue involved a perceived shortcoming in the handling qualities of a Level D/4 flight simulator, particularly in response to an engine failure at V_1 which allegedly was known to some training staff. The matter was referred to the Training management. A further issue was related to a UK operator undertaking single pilot extended aerial work flights and the 'custom and practice' for pilot comfort breaks, which allegedly involved the aircraft being flown by an unqualified observer whilst the pilot was absent from the controls; this practice did not accord with the company's SOP. The matter was referred the CAA.

CIVIL AVIATION AUTHORITY NOTICE

EASA TRANSITION - LICENSING AND MEDICAL

All pilots should be aware of changes that may affect them with the introduction of the EASA Aircrew Regulation on 1st July 2012.

For Licensing information see:

www.caa.co.uk/eupilotlicensing

For Medical information see:

<http://www.caa.co.uk/application.aspx?catid=33&pagetype=65&appid=11&mode=detail&id=4942>

THESE CHANGES ARE EFFECTIVE FROM 1 JULY 2012

FLIGHT CREW REPORTS

EMERGENCY DESCENT PROCEDURE (FB101) - A CORRECTION

Report Text: In Issue number 101 your response to 'Emergency Descent Procedure' (Page 7) quotes UK AIP 1-7-47. I hate to be a pedant but... the final phrase "unless to do otherwise would endanger the aircraft" - should that read "unless to do **so** otherwise would endanger the aircraft"?? In other words, in UK airspace stay straight unless this is dangerous.

As a Trainer I teach, "Stay straight in UK, turn elsewhere, but either way check your TCAS and make a safe decision"

Obviously, if you have an aircraft dead ahead and below on TCAS it would be safer to turn away, even in the UK. Of course you would tell ATC of your intention immediately in the initial Mayday call.

Thanks for a great publication by the way.

CHIRP Comment: The reporter (and one or two others) correctly spotted the error in the quoted text.

The CHIRP Advisory Board reflected on the complexity of the current wording in the AIP and have referred this to the CAA.

AMENDED CLEARANCE (2) (FB101)

Report Text: I feel I must comment on the "FL150 at BEXIL" clearance on the STAR into LGW.

What happens is that the initial clearance to descend is given followed by a heading. On the aircraft type that I fly, this removes the controlled descent path autopilot mode and it defaults to 'Vertical Speed' instead. However, the route showing all the waypoints remains on the NAV display and it is no great effort to achieve FL150 abeam. After vectors a clearance is given "Direct to TIMBA"

On entering the direct instruction into the computer you are given the option of having abeam points to all the previous waypoints. If you opt for no 'abeams' they disappear for ever, a nice clean green line connects the aircraft to TIMBA and the aircraft recalculates its descent path based on requirements at TIMBA or beyond.

If you opt for yes to abeam points, it makes up a new waypoint for each abeam of the previous waypoints, but crucially does not copy any restrictions. If the pilot remembers the restrictions he can then put them back in and the descent path is re-calculated; if he doesn't, the aircraft will recalculate as if you were going direct to TIMBA, but not using the abeam waypoint restriction. In either case, if the aircraft is below the new calculated path it will default to 1,000 fpm until it gets back on it.

So the word is to ATC, if you want the aircraft to achieve FL150 by BEXIL then clear it to BEXIL and all will happen as you want, if you clear it anywhere beyond BEXIL you will only get FL150 there if the crew have guessed what you want and have done something about it. The same is true of any other limit of FL or speed.

I hope that helps. Maybe a few more supernumerary rides for controllers would assist.

CHIRP Comment: This comment offers an insight into the flight deck task associated with an ATC re-clearance. As we noted in the last issue, an ATC re-clearance to TIMBA with a lower level automatically cancels the flight level restriction at BEXIL unless this is restated by ATC as part of the re-clearance.

The Flight Management Computers (FMCs) in most aircraft types currently remove any 'hard heights' from 'abeam' points when the route is amended after being cleared beyond an original waypoint that had a height restriction. (As the comment notes, the FL150 restriction at BEXIL will be deleted when the clearance direct to TIMBA is entered and would have to be re-entered against the abeam BEXIL point if the restriction still applied). New standards of FMCs shortly to enter service have the capability to retain the constraints to the abeam points on the amended route.

With regard to the comment encouraging controllers to take supernumerary flights, these are welcomed by many UK airlines and are approved by the DfT for the purpose of ATC familiarisation. Such flights do offer great insight into how pilots interact with ATC.

CONDITIONAL CLEARANCE (FB101) - A COMMENT

Report Text: An interesting report from a pilot in FEEDBACK Issue 101 (Page 3) concerning the contradictory use of a stop-bar and a conditional line-up clearance.

You sum up the situation nicely when you state that "the use of a conditional clearance by ATC when stop-bars are in operation merits a review."

The reporter states that "the controller politely affirmed that a red stop-bar overrides everything" but on what basis could he/she make that assertion? The instruction and the visual signal are contradictory and that is all that can be said.

Perhaps more pertinent, although the ICAO Rules of the Air state that "an aircraft taxiing on the manoeuvring area shall stop and hold at all lighted stop bars and may proceed further when the lights are switched off", where is this reflected in UK legislation?

CHIRP Comment: As noted above, we recommended in the last issue that the use of a conditional clearance in the circumstances described in the report be reviewed.

This comment highlights the more general issue of the advice available to pilots on stop-bars similar to that provided for ATCOs in MATS Part 1. A review of this aspect of UK policy would also be welcomed.

MORE IS BETTER?

Report Text: Am I alone in finding the relatively new practice of splitting simple clearances, often containing only 2 items into 2 separate transmissions annoying?

We were holding at XXX and the controller said, "ABC123, descend to FLO90" We read back the clearance and initiated the descent and the controller then immediately transmitted again saying, "ABC123 call AAA Director ####.## (frequency)". We are all aware that clearances should not contain too many

separate pieces of information but I would have thought that most licensed commercial pilots could cope with being told to descend to FLO90 and call ####.## in a single transmission.

Splitting a simple call into two separate instructions actually makes things more difficult for us on the flight deck. In this instance, having been instructed to descend to FLO90, we pilots then say a couple of SOP items (Pilot Handling calls out the autopilot modes selected and Pilot Not Handling confirms that the cleared altitude has been correctly set on the MCP). When the call is needlessly split in two, the second call inevitably comes just as the pilots are confirming that the correct action has been taken in response to the first call.

This practice is also becoming common on the ground frequency. Often, on vacating the runway the first contact with the ground controller will result in the instruction, "Turn right onto A and hold short of D". On reading that back, the next transmission often comes immediately requesting that we call the next ground frequency. Leaving aside the debate of whether major airports could have automatic frequency change on landing, once again, needlessly splitting the call, "Turn right onto A, hold short of D and call ####.##" just increases the pilots workload at another busy time of taxiing clear of the runway and perhaps switching off landing lights, radar etc, the use of which on the ground perhaps at night while pointing at parking stands is undesirable.

We can cope with, "turn right onto A, hold short of D and call ####.##" all in one transmission, especially at our home base; it's what we do nearly every day. In summary, please stop this needless splitting of simple calls into two. It's not necessary and in many cases, serves only to increase pilots' workload.

CHIRP Comment: Investigations into the causes of 'Level Bust' incidents endorsed the current policy of normally issuing no more than two ATC instructions in a single instruction.

For similar reasons, ATCOs do not issue a level change instruction followed by a frequency change in the same transmission.

The reporter's comment about the flight deck workload is valid; if the second ATC instruction interrupts the flight crew procedure described above, it could increase the possibility of an error that the ATC procedure is designed to avoid. When the frequency use permits, a short interval between transmissions would address the reporter's principal concern.

"RUNWAY VACATED" OR PERHAPS NOT

Report Text: I would like to report something which is not linked to a specific date and time and place, but more a general habit of some flight crew.

Very often, just at the end of the landing roll, there is a lot of work to do, including frequency changes to Ground frequency, etc. In order to speed things up and be ahead of the game, often the call, 'Runway vacated' is given before the aircraft has totally crossed the holding line at the exit point. Also the call, 'Vacating the runway' is used, which sounds very much like, 'Vacated the

runway', apart from the obvious and significant difference.

In my opinion, we should use calls like 'Turning left on Bravo', 'Landed 22R' or something like that, and not use the words 'vacated' or 'vacating' before the tail of the aircraft has actually crossed the holding line and the status 'runway vacated' has been achieved.

With more and more airports capable of operating under Low Visibility conditions, proper use of the R/T is getting more and more important. Given the amount of attention given these days to 'runway incursion hotspots', it's strange that no attention is being given to the prevention of 'runway excursion hotspots', which can be created anywhere and anytime by incorrect R/T phraseology.

Imagine the situation in which the Pilot Flying seems to take a particular exit, and the Pilot Not Flying calls 'Runway vacated'; then, at the last moment the planned exit cannot be used, so the plane goes back to the centreline and heads for the next exit. In the meantime, as a consequence of the call 'Runway vacated', another aircraft could be cleared for take-off.

Already this year I have heard two aircraft happily declaring 'Runway vacated' while they were still on the runway centreline.

CHIRP Comment: CAP 413 - 'Radio Telephony Manual' is quite specific; the correct terminology is "Runway vacated". (Chapter 4; Para. 1.11.1 refers).

Also, unless otherwise advised/instructed pilots should remain on tower frequency until the runway has been vacated.

A POTENTIALLY DANGEROUS DISTRACTION

Report Text: It was a foul night. Wind NNE/25-45kts, a low cloudbase, visibility 3K in continuous heavy rain, freezing level 1,500-2,000ft. We were scheduled to operate to offshore platforms in an aircraft without icing clearance.

Shortly before report time I received an e-mail advising of a new roster to be imposed in several weeks time, which would cut across a long-planned family celebration.

Flight planning involving multi-sector shuttling to/from /between platforms was complicated by freezing level affecting the accessibility of alternates. I found it hard to concentrate, feeling generally "behind the drag curve". Flight plan was rejected four times due to mistakes.

As handling pilot, my approach and landing to XXX platform was clumsy to say the least, even accounting for the turbulence. On take off from XXX (IMC) I did something I had never done before and caught my hand on the Eng Chip test switch whilst releasing the brakes thereby causing both engine chip warnings to illuminate. Luckily my co-pilot HAD done it before and knew the cause straight away, so no immediate panic ensued.

On the next sector descending to the YYY platform in heavy rain and turbulence passing 800ft IMC for 500ft I realised that I had not selected ALT PRE-SELECT. This time my co-pilot had not picked up my mistake (flight

director selections are not duplicated on both sides in this cockpit).

I can only conclude that my general feeling of distraction about the imposed changes to my roster led to this under par performance.

Lessons Learned:

1. Always monitor your colleague.
2. Flight director selections should be duplicated.

CHIRP Comment: Research has shown that a significant distraction can lead to a subsequent loss of cognitive performance. This report is a good example of this effect.

MORE ON USE OF PEDS

Report Text: The arrival of CHIRP [Air Transport] FEEDBACK prompts this report on an issue that has been concerning me for some time. I feel that the subject needs discussion amongst the pilot and cabin crew fraternity as well as the engineering community and your CHIRP FEEDBACK seems to be an appropriate and respected forum that may reach a large number of these people directly involved with the issue.

As a retired professional pilot with a career of over 47 years in flying, mainly on long haul routes, it concerns me that there is a growing trend for commercial airline passengers to disregard the instructions given to them, both by the pre-departure and pre-landing safety briefings as well as the written information in in-flight literature, as observed whilst I have been travelling as a passenger myself.

The use of mobile/cell phones whilst the aircraft is taxiing to and from the runway is quite common and on a recent return flight to the UK from the US an American couple in adjacent seats were both observed using iPad devices on the final approach. Politely enquiring if they were in fact iPad devices this was confirmed and I then politely reminded them that they had been asked to switch off this type of device as it could interfere with the electronic systems on the aircraft and would be of particular concern during the approach and landing. Both devices were switched off but as soon as the wheels touched the tarmac they were switched back on again. (With possible implications for an automatic low visibility approach and landing!) It was not possible to tell whether the devices had been selected to "airplane mode" or not but I am sure that there is a large proportion of owners of such devices who are ignorant of the purpose of the mode let alone of how to select it.

Cabin crew are not able to monitor the actions of all passengers in the area of the cabin under their supervision when both they and the passengers are correctly seated for landing, so a large number of transgressions can go completely unnoticed and therefore uncorrected, with even the most diligent of cabin crew. There needs to be further definitive research into the effects of Portable Electronic Devices on current aircraft systems and either a relaxation of the current ineffective instructions to passengers on the use of such devices or, if there is still deemed to be a realistic danger to safety of flight, a way found to get the

message across far more forcibly and effectively to the travelling public.

I am certain that it is an industry-wide problem and some non UK airlines have either no such briefing or it is very much more cursory than that of UK airlines, therefore a worldwide solution needs to be implemented as widely travelling passengers will otherwise quote lack of restriction on other airlines, that of course devalues the instructions to them on more restrictive airlines in the use of PED's.

CHIRP Comment: The wide disparity in the advice provided to passengers regarding the use of personal electronic devices leads at best to confusion and frequently to non-compliance. There is a general feeling among cabin crew communities that this is a difficult issue to manage in spite of the guidance published by the CAA in Aeronautical Information Circular 1/2004.

The promulgation of an EASA policy on the use of PEDs and the research on which the policy is based would ameliorate many of the difficulties that airlines and cabin crew members currently experience.

CABIN CREW REPORTS

EXTRA SEATING

Report Text: We had a full flight on this long haul sector. The captain elected to take extra passengers by using the flight deck jump seats. To accommodate this two cabin crew members including the SCCM were told they had to sit in the flight deck to release their crew seats by the doors to enable the extra passengers to have a seat for take off and landing.

After take-off the Captain allowed a passenger to use the flight crew bunk and then half way through the flight another was permitted to use a bunk. This totally contradicts company SOPs which state that bunks are only to be used by operating trained crew.

We as crew voiced our objections but we were told that it was his/her decision. I felt that this decision was not safe because had there been a situation these passengers would not have known how to use the SEP equipment.

I did not report this to the company as I know they will not take any action against our pilots and I feel afraid of repercussions.

CHIRP Comment: The CAA advises that the operating SCCM must be present in the cabin during take-off and landing. Crew positions are specified in an operator's SOPs and these must be adhered at all times. Cabin crew seats located at an emergency exit must only be occupied by individuals who meet the criteria stipulated in the operator's SOPs.

As regards the use of crew rest areas by passengers, many companies stipulate that they are for crew use only; also, a passenger is unlikely to be fully familiar with the SEP equipment or the egress procedure in an emergency.

The scope of a captain's authority for the operation of an aircraft is quite clear. In normal operations it requires compliance with company Standard Operating

Procedures. It is only when the safety of the aircraft and passengers would otherwise be at risk that a captain may elect to ignore SOPs; however, in such a case, the captain must be prepared subsequently to justify his/her actions.

Administration/Cabin Crew Programme Manager

THE ROLE:

The principal responsibilities of the Administration/Cabin Crew Programme Manager are the day-to-day management of all aspects of the Trust's administration and the management of the cabin crew confidential reporting programme. The post-holder will be based at Farnborough, Hampshire.

THE DESIRED PROFILE:

- Good organisational and office administration skills.
- Self motivated; ability to work to a consistent high standard with minimum oversight.
- Good knowledge of cabin crew role and responsibilities.
- Good interpersonal skills with the ability to communicate effectively at all levels up to senior management.
- Good writing skills in English.
- Computer literate with good working knowledge of Microsoft Word, Excel spreadsheets. Knowledge of Microsoft Access and database entry would be an advantage.

APPLICANTS SHOULD APPLY IN WRITING WITH A CURRENT CV TO: THE CHIRP CHARITABLE TRUST, 26 HERCULES WAY, FARNBOROUGH, HANTS GU14 6UU

THE CLOSING DATE FOR APPLICATIONS IS: 23 APRIL 2012

Civil Aviation Authority

SAFETY NOTICES

Details of recently issued Safety Notices can be accessed via the Publications Section of the CAA Website www.caa.co.uk:

Civil Aviation Authority

INFORMATION NOTICES

Details of recently issued Information Notices are published on the CAA website at: www.caa.co.uk

Have you Moved House?

If you receive hard-copy FEEDBACK as a licensed pilot/ATCO/maintenance engineer please notify Personnel Licensing at the CAA of your change of address and **not CHIRP**. Please complete a change of address form which is available to download from the CAA website and fax/post to the CAA at Gatwick:

The Change of address form is available from: www.caa.co.uk/docs/175/srg_fcl_changeofaddress.pdf

Alternatively, you can e-mail your change of address to the department that issues your licence (please remember to include your licence number!)