# CHIRP

# Air Transport FEEDBACK

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## EDITORIAL

The deadline for transition to EASA FTLs on 18 February 2016 has come and gone with varied effects reflected in reports to CHIRP. Some of the reports reflect genuine changes in the regulations while others reflect misunderstandings over what has changed and what has remained the same in its effect but has been 'rebadged'. Operators whose flight time specification schemes use the full scope of EASA FTLs will have the most changes from CAP371 whereas others have few.

Communication is the key and several reports reflect communications from operators that could have been clearer and appear to have lead to misunderstandings by flight crew and a sense that there is more they need to know. Although there is clearly an appetite among flight crew to understand the full envelope provided by EASA FTLs, in our experience the EASA documents can be difficult to interpret and understand. Furthermore, as time goes by there are likely to be amendments to the regulations, evolving interpretations and proposals for Alternative Means of Compliance. Familiarity with your company operations manuals is essential, these providing sufficient knowledge to comply with EASA FTLs. Readers should not be deterred from further research, however, including using CHIRP to investigate and challenge operators' interpretation and implementation of EASA FTLs.

Ian Dugmore - Chief Executive

## GROUND HANDLING & SECURITY REPORTING PROGRAMME

CHIRP is rolling out a new programme to encourage ground handling and security staffs to report safety issues. Some 8% of all safety reports sent to the CAA involve ground handling with ground damage and loading errors the most common causes. There is almost certainly more that could be reported and our aim is to learn about incidents and near misses that are not currently reported. Part of the reluctance may be that ground handling can be a hire-and –fire environment where the Just Culture has yet to touch.



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If you have the opportunity to speak to ground handling or security staff at UK airports please encourage them to submit reports to CHIRP and emphasise that reporters' identities will be protected.

Dave Tattersall – Deputy Director (Engineering)

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# ENGINEERING EDITORIAL

*Airside Human Factor Issues:*

Recent reports to CHIRP have highlighted concerns on the Human Factors (HF) impact to individuals during enforcement of airside regulations. Examples include:

- Immediate confiscation of an airside driving permit for using a mobile phone whilst driving, impacting on an individual's ability to adequately carry out their duties for the remainder of the shift, and putting them under undue stress. If contact of an employee, whilst on duty, is required by mobile phone then the employer should ensure vehicles are fitted with hands free kits.
- Detention of a Captain deemed to be insufficiently visible carrying out aircraft walkround inspections, potentially leading to missing external damage and/or defects, which might compromise the aircrafts airworthiness.
- Reprimanding an Engineer, whilst working on an aircraft, for an unfastened hi-visibility tabard, potentially leading to a missed and/or unfinished maintenance task.

Regulations are in place to ensure Airside Safety and Security is maintained throughout the airport operational areas, and as such they should be adhered to. However, the examples above demonstrate that there are occasions when the enforcement of regulations can have an HF impact on the individuals that can affect their mind-set and ability to carry out their duties correctly, leading to stress-related errors.

Airport authorities should consider the HF impact of enforcement on individuals as well as the severity of the sanctions applied. Perhaps a warning, at the time of any incident, with the potential of follow-up action at a later date might be a more appropriate course of action, rather than the immediate application of a sanction.

Shortfalls in equipment and time constraints can put individuals under pressure to achieve their tasks. Employers have a duty to ensure that adequate resources, both equipment and time are available for duties to be carried out, in accordance with regulations in a safe and secure manner. Training for all airside workers should ensure they are aware of, and understand, the rationale behind, airside regulations. A proper understanding will help everyone play their part in ensuring a safe and secure working environment.

Dave Tattersall – Deputy Director (Engineering)

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## NOTICE IN RELATION TO CIVIL AVIATION WORKING TIME REGULATIONS (WTRS) (2004)

**Report Text:** My employer has recently provided guidance in relation to the Civil Aviation (Working Time) Regulations 2004.

It permits both groups to take rest breaks at appropriate moments: 1. in the air and; 2. on the ground, during intensive short haul operations.

For the former scenario then, that would be in the flight deck, still at the controls of a two-crew airliner, with a crew of only two, with radio calls, weather avoidance, fuel checks and the usual background noise. Hardly an environment conducive to tactical rest breaks. As stretching of the definition of a rest break (i.e. off-task) as ever I saw it. From experience, factory workers (an equivalent noise level) have a segregated room.

For the latter scenario, that would occur by enforcing a deliberate delay to the schedule with the subsequent consequences (post-event, cabin crew micro-managing) and therefore the overall duty period OR guaranteeing an early enough arrival to down tools for ten minutes - only to be pestered by dispatcher, fueller etc. anyway. Oh, there's no GPU, so one of you must stay in the flight deck by the way with the APU running. Equally impossible.

To publish these expectations purely as a loophole-closer is a naive exercise and just erodes trust all the more. We're expected to uphold robust moral and human judgement yet behave like robots when it suits the operation.

***CHIRP* Comment:** Operators are required to comply with whichever is the most restrictive of the UK Civil Aviation (Working Time) Regulations 2004 or EU FTL. In 2008 the CAA offered guidance to operators that included:

> .....when considering what is an adequate rest break for the purposes of Regulation 7(2) (a) of the 2004 Regulations, it is reasonable to take into account the 20 minutes in six hours provision in the 1998 Regulations [the 1998 WTR do not apply to flight crew].
>
> We believe that the reason the 2004 Regulations, which apply to air crew, do not contain a prescriptive requirement for rest breaks, such as 20 minutes in six hours, is to afford an employer a degree of operational flexibility. But the requirement must be to ensure that a crew member's health and safety is protected in a way which is reasonably equivalent to the provision of a 20 minute break in any six hour period of work.
>
> For example, shorter multiple breaks could be acceptable as long as the overall goal of protecting health and safety is achieved, although experience would suggest shorter breaks may not be as effective as an uninterrupted longer break and therefore overall more time may be required to achieve the same result.

Since this guidance was issued, EASA FTLs have been introduced. Under EASA ORO.FTL.105 Definitions:

> (6) "break" means 'a period of time within a flight duty period, shorter than a rest period, counting as duty and during which a crew member is free of all tasks'.

EASA FTL do not stipulate the requirement for breaks in a FDP per se but ORO.FTL.240 Nutrition states:

> (a) During the FDP there shall be the opportunity for a meal and drink in order to avoid any detriment to a crew member's performance, especially when the FDP exceeds 6 hours.
>
> (b) 'insert airline name' shall specify in accordance with AMC1 ORO.FTL.240 how the crew member's nutrition during FDP is ensured.

AMC1 ORO.FTL.240 Nutrition MEAL OPPORTUNITY states:

> (a) The operations manual should specify the minimum duration of the meal opportunity, when a meal opportunity is provided, in particular when the FDP encompasses the regular meal windows (e.g. if the FDP starts at 11:00 hours and ends at 22:00 hours meal opportunities for two meals should be given).
>
> (b) It should define the time frames in which a regular meal should be consumed in order not to alter the human needs for nutrition without affecting the crew member's body rhythms.

To provide further guidance the CAA has published EASA FTL Q&A CAP1265. On page 16:

> AMC ORO.FTL.240 Nutrition. Does the crew member need to be "off task" to take their meal opportunity?
>
> No. There is no definition for "off task" and a duty period runs continuously from report to off duty time. As part of planning the operator must ensure that there is capacity within the duty/FDP for this Implementing Rule to be met and specify in the Operations Manual.
>
> On the day within an FDP either the Captain or the Senior Cabin Crew Member is responsible for ensuring that the nutrition requirements in ORO.FTL.240 are met.

The need for flexibility in air operations is recognised and sensible. However, during high-intensity short haul operations when it may be impossible to take a break while airborne, it is difficult to see how commanders can meet their obligations to ensure that they and their crews achieve the reasonable 'equivalent to the provision of a 20 minute break in any six hour period of work' if there isn't the equivalent of 20 minutes built into the schedule to begin with. As operators adjust to EASA FTLs it remains to be seen how they will "ensure that there is capacity within the duty/FDP" for the meal opportunity.

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## INSUFFICIENT FUEL FOR AN INSTRUMENT APPROACH

**Report Text:** The airline I work for operates to a destination which, due to high ground to the south, only has an NDB approach to Rwy [SW] with no DME and no RNAV approach available. Due to prevailing winds,

a circling approach is routinely flown to the NE runway. All instrument approaches in IMC will therefore require fuel to the overhead, enter the hold and then fly a timed outbound leg before turning inbound, which is quite a convoluted procedure, and then to circle. This procedure, due to the [good] weather at the destination, is seldom flown; it is often truncated to a visual into the downwind for Rwy [NE] which saves a lot of time and fuel. I have no problem with doing that, but my issue is that the flight plan does NOT include fuel or time to fly the full NDB approach. Instead we are advised on the approach plate to carry 600kg extra fuel in case we expect to need to do the full approach. Now bear in mind that if this is a first time to [ ] then you are most likely in the cruise when you read this!

So my issue is, are we not, under the terms of our AOC required to carry fuel to complete the available instrument approach? If not, should we not be carrying fuel for two diversions? I as Commander am doing this, but we as a company are not. If it is permissible to only carry fuel for the visual approach and then one diversion to an instrument approach, would it not be better to have the note about extra fuel on the flight plan for pre-flight consideration?

Finally some of my colleagues consider it acceptable to fly direct to the inbound FAF using the aircraft's LNAV systems and then fly the approach to minimums from there without proceeding to the NDB at all. Whilst I understand the logic, and that the GPS based system is highly accurate and reliable, it seems to me that this is a flawed and illegal procedure, as they are effectively making up their own RNAV approach. Worryingly this appears to be condoned by some of our training department.

The desire to save a few quid here and there seems to be leading to airline operations being treated with an increasing lack of respect by the AOC holders, a sure fire recipe for disaster as our increasingly inexperienced flight crew are exposed to more and more pressures and threats that they are ill prepared to deal with. I have raised this issue on a number of occasions with managers and trainers, but so far to no avail.

Lessons Learned - The desire to save fuel by not carrying adequate reserves can lead a company, and some of its pilots, to act in hard-to-justify ways, and to possibly breaking the ANO.

***CHIRP* Comment:** It is permissible for IFR flight plans to use fuel calculations based on a visual approach. Trip fuel is the fuel required on any particular occasion and should include fuel for an instrument approach unless better information indicates that it is unnecessary. There is no requirement for 2 diversion airfields to be available provided forecast visibility and ceiling are above planning minima; only one alternate is required. Although it could be nice to have the advice about the additional 600kg for an instrument approach on the flight plan, it should be unnecessary since this operator requires aircraft Commanders to read before flight (and sign as having read) the relevant airfield briefing where the information is included. Furthermore, the inclusion of extracts from the airfield briefing in a flight plan could result in other important elements of the briefing being overlooked. The flight plan should define the route and approach intended and any other factors included in calculating the fuel requirement.

The reporter is correct to be concerned at the practice of flying direct to the FAF without proceeding to the NDB. The NDB to the SW runway is a non-precision approach without a FAF. The FAF is only a coded FMC position which is located on the inbound course. Therefore in IMC the procedure must be flown in full from the NDB, which is the point of the extra fuel requirement. In VMC, it is permissible to fly the coded FMC procedure as part of a visual approach provided the criteria for VMC and visual approaches are maintained.

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## DUTY AT AIRPORT VS. STANDBY AT AIRPORT

**Report Text:** Under the old CAP 371 FTL scheme the company used to roster a two hour standby at home after completion of the two sector night freight FDP. Following the advent of EASA FTLs the company has started to roster a Duty at Airport (DAA) instead of the home standby. In essence we are now expected to remain, and be available, at the airport for one or two hours should we be required for more duty. In anyone's book, and by (EASA) definition, that is a Standby at Airport (SAA).

If this is considered to be a continuous duty from check in for the FDP to the end of the DAA then there is no difference between rostering a DAA and an SAA, in terms of duty time, as the FDP will start at the check in time (unlike a standalone SAA where the FDP starts at the call out time).

This duty is essentially being used as a Standby at Airport but as the company have called it a DAA they can avoid having to provide the EASA mandated accommodation. We appear to be operating, in part, to both the old and the new FTL schemes.

We are usually rostered up to five of these duties in a week and the DAA takes place in the very early hours of the morning (the actual time is base dependent but is nominally between 0200 and 0400). Call outs do happen (normally on the fifth day) and usually involve positioning an aircraft to another base followed by a taxi journey back to home base.

The general consensus among flight crew is that this is a misuse of our new EASA FTL scheme and is not in the spirit of Fatigue Risk Management.

***CHIRP* Comment:** The operator is using the regulation correctly for this duty. Duty at the airport is meant to cover everything from where crew are used to check-in passengers, sell tickets, attend a meeting (all of this can be followed by an FDP), or be on standby (where no accommodation is provided). CAP1265 EASA FTL Q&A Page 19 explains this:

> (a). When on airport standby, the FDP is calculated from the pre-flight report time that a crew member is called for not the start of the airport standby. Any time over four hours on airport standby will reduce the allowable FDP - the combined standby and FDP cannot be longer than 16 hours (if accommodation, in accordance with the definition, is provided). If no accommodation is provided then the crew member is considered to be on FDP as well as duty at the airport from the time they report.
>
> For other duties at the airport that could lead to an FDP, then ORO.FTL.225 (d) applies with the reporting time for the duty at the airport being used for the calculation - and start time of an FDP if the crew member is subsequently called to operate a flight. All requirements of ORO.FTL.235 must be applied to duties at the airport.
>
> While the operator could just roster the term "Duty at the Airport", it is advised that operators develop a list or series of codes to indicate the tasks that are required during the duty. This could include standby (but not using the extensions permitted under airport standby), training, briefings or meetings and then include the requirement to operate a flight or flights.
>
> *No accommodation would need to be provided for duties at the airport.*

Essentially, if the FDP clock is running, an individual is on duty and no accommodation needs to be provided. If an individual is at the airport and the FDP clock had not yet been started, the individual is on standby and the operator needs to provide the accommodation to the standard mandated under EASA FTLs.

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## AIRPORT STANDBY UNDER EASA

**Report Text:** I want to query an element of the recent EASA FTLs which have come in. It refers to "Accommodation" provided for airport standby.

* "Airport Standby means a standby performed at the airport"

"Accommodation means for the purpose of standby and split duty, a quiet and comfortable place not open to the public with the ability to control light and temperature, equipped with adequate furniture that provides a crew member with the possibility to sleep, with enough capacity to accommodate all crew members present at the same time and with access to food and drink". "Note: Adequate furniture for crew member accommodation should include a seat that reclines to 45 degree back angle to the vertical, has a seat width of at least 20 inches and provides leg and foot support."

[ ]seem to have got around this, and are now referring to "Airport Standby" as it appears on the roster to "Airport Duty", and thus the "Accommodation" need not be provided. I have done my fair share of Airport Standbys at [ ] and there are often so many on standby it can be difficult to find a comfortable place to sit. On-top of this, our TV has glaring lights with no ability to dim them and does not provide a great setting to relax. The same can be said for the Costa Coffee with hard seats and brash lighting.

My question is: How are [ ] able to redefine what is clearly an airport standby to suit their own needs? It is not beneficial to the crew members on standby for 6 hours to not have a sufficient place to rest.

***CHIRP* Comment:** As explained in the comment for the report above, under EASA FTLs operators can roster airport standby in 2 ways. If an individual is on standby but the start of a FDP is delayed until the report time for the flight, accommodation must be provided. Alternatively, if the reporting time for the standby at the airport is used for calculating any subsequent FDP, the crew member is considered to be on duty at the airport and accommodation does not need to be provided. This begs the obvious question, 'where are crew members supposed to go?' There is no guidance on this, as the nature of duties can vary widely. Although this is understandable on one level, it also seems likely that for crew members who are not actively engaged with a task, waiting to be called for a duty will likely be less wearing in a crew room than in the public areas of the airport. Of note, the CAA did not provide guidance in their airport standby regulation either.

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## General Concerns Re. Lack of Training and EASA FTLs

**Report Text:** As part of our move to EASA rules we were notified that the manuals have been updated and received a couple of email newsletters regarding the company's view of the changes. We also have been sent a leaflet with general guidance on what has changed.

Unfortunately we have had no formal training on the new legislation, despite our manuals claiming we should have both initial and recurrent classroom based training on the changes and FRM. As we haven't had this initial training it appears likely we will only receive the training when we reach the recurrent simulator training each year. This could potentially be a year after the implementation or even worse, 2 years later if it's at SEP. But we haven't yet been told how the training will be delivered.

Having this training pushed into a simulator brief, as has been done with the security training (actually just a series of multiple-choice questions rather than training) is wholly inappropriate. This legislation is complex and significantly different to previous regulation; as such it deserves a significant allocation of training time and resources.

I feel that most of the pilots, myself included, have little understanding of the finer points of the legislation or how or when they should be applied. The only people who seem to have received the full training are crewing which means we must now rely on them being correct when they tell us what they are trying to get us to do is legal. I am sure that they are correct most of the time but they are not infallible and neither is the system they rely on. Add to this that we now have a caveat for reducing FDP and increasing rest which involves contacting the duty pilot (who isn't always available) and we are left to make decisions that affect safety and fatigue with no information and no guidance.

As far as I understood it, training in the new FTLs and in FRM was part of the EASA legislation, but the company seem to have taken the view that because we already have a working FRM system which isn't visibly changing, then we don't need training on the rest of the information. This is worrying as I've already come across several colleagues discussing parts of legislation that they don't understand and we are left to 'teach ourselves'.

The combination of lack of knowledge and increase in potential duty times and sectors flown is a significant safety risk, and I cannot understand why the CAA have allowed all this legislation to be introduced, when it involves several significant changes to our working practices, without subsequently enforcing appropriate training for us to understand the rules and operate within them in a safe manner.

If you could look into this matter I and my colleagues would be most appreciative.

***CHIRP* Comment:** There is an EASA requirement for operators to conduct Fatigue Management Training but no mandate to conduct training in the content of EASA FTLs themselves. In approving this operator's training plan, the CAA agreed that its existing fatigue training programme was compliant with the EASA training requirements and could simply be rolled on. Operators' flight time specification schemes are required to be compliant with EASA FTL and it is sufficient for flight crew members to be familiar with the relevant Ops Manual. The operator's decision to continue to apply its own existing rules, many of which are more restrictive than EASA FTL, meant that the changes in practice were minor and the training

concentrated on the differences. That said it is disappointing that the reporter did not feel the scope and content of the changes to be implemented were explained with sufficient clarity to provide confidence.

After many years of working to CAP371, there will be areas of EASA FTLs that require interpretation and/or clarification. The operator has indicated its intention to focus on these as part of the recurrent training content having, where necessary, taken into account the subsequent guidance of the Competent Authority.

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## PRE-FLIGHT WALKROUND INSPECTIONS

**Report Text:** I was standing by while the aircraft (a non-UK AOC A320) arrived on stand and positioned my hydrant refuelling truck under the left wing (time STD -35). After making all the necessary connections and been given the "green light", I commenced refuelling. During the 15-20 minutes it took to refuel this aircraft, I thought it odd that I never observed either pilot doing their pre-flight walkround inspection and never was there one of the pilots positioned at the nose of the aircraft to communicate with the flight deck if necessary while passengers were boarding as should be done under EASA rules when refuelling is in operation.

At STD -10 I completed the refuelling procedure and took the ticket to the flight deck for the required signature. Then I moved my truck from under the wing and parked up along the stand to complete my paperwork. At STD -5 I noticed the First Officer come down the air bridge stairs, breeze past the front of the left engine, go under the fuselage across to the front of right engine, and then immediately return back up the stairs. This took all of approximately 20 seconds!

All that this pilot could have observed during this extremely brief inspection was that the large pieces of the aircraft were in their relatively normal locations. To think that the 150+ passengers, plus cabin staff, blindly trusted this flight crew to do a professional and thorough job at all times and in reality this is what actually happens. I would find this unbelievable if I had not witnessed it myself. And, I have observed many pre-flight inspections in my time. Some better than others, with some being on the side of failure. But this takes the cake!

Perhaps the CAA should take some time to periodically observe the standard of pre-flight inspections which actually occur. It may save some lives.

***CHIRP* Comment:** Pilot responsibilities include managing risks and it is not known whether the flight crew on this foreign-operated aircraft were occupied with a conflicting task. However, the regulations covering refuelling are as follows:

> *AMC1 CAT.OP.MPA.195 Refuelling/defuelling with passengers embarking, on board or disembarking*
>
> (c) Operational procedures should specify that at least the following precautions are taken:
>
> (1) One qualified person should remain at a specified location during fuelling operations with passengers on board. This qualified person should be capable of handling emergency procedures concerning fire protection and fire-fighting, handling communications and initiating and directing an evacuation;
>
> (2) Two-way communication should be established and should remain available by the aeroplane's inter-communication system or other suitable means between the ground crew supervising the refuelling and the qualified personnel on board the aeroplane; the involved personnel should remain within easy reach of the system of communication;

Since these requirements do not appear to have been met, the refueller was correct to draw attention to the issue by submitting a report. Similarly, the brief walk round inspection by the flight crew may not have met the requirements of the operator's Operations Manual and was also correctly reported. Reports such as these are used to inform ramp inspections as required under the EU Ramp Inspection Programme. In case of significant irregularities, the operator and the appropriate Aviation Authority (State of Operator or State of Registry) are contacted in order to arrive at corrective measures to be taken not only with regard to the aircraft inspected, but also with regard to other aircraft which could be concerned in the case of an irregularity which is of a generic nature. Data from the reports as well as supplementary information are shared and centralised in a computerised database set up and managed by EASA.

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## IFR Approaches using SSR only

**Edited Report Text:** My report relates to an Airprox (2015001) between a DHC 8 and an untraced glider which raises important questions on where responsibility lies.

CAP774 refers to the pilot's responsibility to choose the appropriate Air Traffic Service (ATS) outside controlled airspace. The controller will endeavour to provide the service and advise of limitations which would include using SSR only. I would expect the pilot to understand the implications in Class G that not all aircraft communicate with ATC, carry transponders or perhaps do not operate them. This renders these unknown aircraft invisible to ATC and TCAS equipment when the airfield's Primary Surveillance Radar is u/s or even off for routine maintenance. Assuming the Commander understands the implications of the service being limited to SSR only, what is he expected to do? As occurred in this Airprox, under a Deconfliction Service the controller could issue instructions that would take the flight into IMC and bring it into conflict with traffic that is invisible to controller and impossible for the crew to see and avoid. Whose responsibility is this and how can it be avoided? Why is it not mandatory for these types of flights to be protected by Controlled Airspace for an IFR arrival to allow for such PSR failure which is the only method to detect ALL aircraft? Perhaps the CAA have not had to mandate CAS at airfields before because the Aerodrome Authorities have not listened to ATC about the sheer number of conflicts and assessed it as a requirement for safer operations. What has to happen for change? At what point is it considered CAS is a requirement or has the Aerodrome Authority produced a risk assessment as part of its CAA licensing for continued operations in Class G (sometimes referred to as Grey airspace or Bandit country) as passenger numbers increase up to limit? Or no limit, until an accident occurs?

Lessons Learned: The CAA should review the Duty of Care guidance in CAP774 about who is responsible for SSR only operations whereby Air Traffic Services Outside Controlled Airspace (now referred to as Flight Information Services) which are predominately used as an en-route service, are also used at airfields for IFR approaches and pilots (particular public transport) cannot make reasonable allowance, e.g. stay VMC or use another ATS provider.

***CHIRP* Comment:** **Aircraft commanders are responsible for the safety of their aircraft. ATC provides a service to mitigate risk, and the availability of ATSs will be included in the operator's risk assessment, but in the 'see and avoid' environment that is Class G airspace ultimate responsibility lies with the aircraft commander. Risks can change over time as well as at short notice in the case of unplanned maintenance. Commanders who are concerned should discuss with their management whether their risk assessment remains appropriate and accurately reflects the risks they are being exposed to. Controllers' Duty of Care is clear. Even under normal circumstances ATC is recognised as an imperfect aid since not all aircraft carry transponders and not all airborne objects can be detected on primary radar. When primary radar is unavailable, controllers are required to inform pilots that the service is degraded; good practice is to remind pilots, particularly those who may not be familiar with UK FIS, of the implications of SSR only. Doing so discharges their Duty of Care.**

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## Concealed Tool Enquiry

**Report Text:** I'm a licensed aircraft engineer based in the UK I've just come across the new soon-to-be-released Leatherman Tread.

It's a multi-tool bracelet that they are heavily advertising as aircraft travel safe on both their website and the video advertising. The link to the company's website is: http://www.leatherman.com/425.html

Video advertising: https://www.youtube.com/watch?v=gp8xR07rBH4

Does this go into the remit of concealed tooling that wouldn't normally be allowed to be brought on board an aircraft due security issues?

Some clarification would need to be conveyed to the relevant security departments and airline staff in the UK, Europe, worldwide for minimising delays/passenger convenience/issues that may come about with passengers wearing such a device.

No doubt many copy variants will also follow.

If it is permissible to wear on board an aircraft this would greatly increase the capability of tampering with aircraft equipment, with the most probable interference with cabin furniture and IFE equipment but would not be limited to this as it has the most common sizes of tooling for aircraft components.

With features such as a Cutting hook, Carbide glass breaker, screwdriver bits, 5/16" and 1/4" sockets....

At the very least I think the company need to emphasize the serious implications and punishable consequences of unauthorised use of the tool on airlines property.

***CHIRP* Comment:** The device complies with regulations for carriage on aircraft in having a blade smaller than 6cm but wearers might nevertheless have them confiscated by airport security staff.

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