

FEEDBACK

Issue No: 65

January 2003

EDITORIAL

FLIGHT TIME LIMITATIONS

In August 2001 CAA (SRG) issued Flight Operations Department Communication (FODCOM) 12/2001 dated 1 August 2001 proposing a number of amendments to Civil Aviation Publication (CAP) 371-Third Edition.

After considering the responses from Industry, CAA (SRG) has elected to issue a second consultation document (FODCOM 29/2002 dated 2 December 2002). This document summarises the comments received and details the Authority's proposals in the light of these. Further comments are invited by not later than 31 January 2003.

If implemented, the changes proposed in the most recent FODCOM would address the majority of FTL related concerns reported through this Programme over the past three years or so.

ATC REPORTS

ATC Reports received in Period: 1

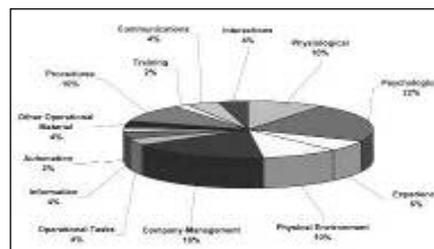


"Three Hail Mary's - and send a CHIRP report!"

FLIGHT CREW REPORTS

Flight Crew Reports received in Period: 26

Key Areas:



ATC UNDER PRESSURE

What happened to ### ATC on the evening of ###? Weather was good VMC but we had a 29-minute hold. Whilst we held we heard two aircraft go around.

We were put on the localiser at 4,000ft quite close to the Glideslope intercept. Told to keep 180Kts by ### Director. Unable to tell the controller that we were LOC established because of R/T overload.

Eventually got clearance for ILS approach and had to use Vertical Speed mode down to intercept the Glideslope. Not told to slow to 160Kts to 4 DME until about 6 DME, so in my opinion chasing preceding aircraft too quickly (when we vacated the runway after landing, the closest following aircraft was still a long way out).

Slowed to 160Kts, then at 4 DME to $V_{Ref} + 5$.

Preceding aircraft still on runway when we contacted Tower. Concerned about possible go-around. Preceding aircraft was slow to clear, but then was clear and nothing from Tower. At 100ft radio I called "ABC 123 cleared to land?" and then Tower cleared us to land when we were in the flare.

We were almost third go-around in 30 minutes.

It did not appear to be a good night for ### ATC.

An Air Transport Safety Newsletter

from the Confidential Human Factors Incident Reporting Programme

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

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ATC WORKLOAD/RTF PHRASEOLOGY

In an environment where we are trying to reduce ATC workload and needless communication, why is it in the UK that the following R/T calls are made when approaching an ILS at any airfield:

ATC: "ABC 123 descend to #,000ft, turn R/L heading xxx and report established localiser runway xx"

Me: Readback

Me: ABC 123 established localiser runway xx

ATC: ATC 123 cleared to descend with the glidepath/or ILS

Me: Readback

(plus all the ROGERS!)

In Europe the calls would be more like:

ATC: ABC 123 descend to #,000ft, turn R/L heading xxx and cleared ILS runway xx

Me: Readback

The R/T is reduced by around 50% AND, as has happened to me on a number of occasions, if localiser intercept equates to intercepting the glideslope also, I can't always get a word in to be cleared descent, therefore, I either fly above the glideslope or take an uncleared descent - the latter normally wins!

Why can't we do the same in the UK?

The procedure in the UK, as detailed in CAP 493 Manual of Air traffic Services - Part 1, is as the reporter states and differs from the ICAO recommended procedure. ATC issues an RTF instruction to establish on the localiser and subsequently, once established, a separate instruction is issued to descend on the ILS. The rationale for separate instructions is that at several major UK airports there are routes under the ILS approach path; these may require aircraft on the ILS approach to maintain a specific altitude for traffic separation. There is provision in CAP 493 for ATC to issue a single conditional clearance, if circumstances require.

The above procedure is not reflected in the phraseology published in CAP 413 Radiotelephony Manual for flight crew. On the recommendation of the Advisory Board, the reporter's comments have been passed to CAA (SRG) for further consideration.

SID CLEARANCES

Regularly, having checked-in on the frequency while following the AAA Standard Instrument Procedure (SID), when departing from ### (A UK Regional Airport) we are given an instruction such as, "After noise heading 175°, climb FL140".

More often than not, (after seeking clarification) what this instruction was intended to say was "Climb NOW FL140 and after noise heading 175°".

To avoid continuing confusion, may I suggest either that the initial instruction becomes two (one for heading after noise, the other for continuous climb to FL140).

Or

The word NOW is inserted in order that the climb is not terminated at the SID limit until reaching the end of the noise abatement procedure.

Similar confusion occurs at ### (A UK airport) with the YYY SID, which has a step climb. When cleared to the SID altitude limit is that clearance NOW or only after reaching the step climb point?

With regard to the reporter's first point, a change in phraseology to "Climb to FL 140. After noise, heading 135°" would clarify the instruction.

In the UK, an amended ATC clearance to a higher altitude will automatically cancel any previous clearance or a requirement to level at an intermediate step altitude on a Standard Instrument Departure, unless the intermediate restriction is repeated in the amended clearance (Manual of Air Traffic Services Part 1, Section 1, Chapter 4, Para 6 refers).

SELF-DRIVE POSITIONING

(1)

Over many years our company has usually been very good with duty times and has rarely scheduled crews close to limits. However, in recent months there has been a disturbing trend towards asking crews to drive rental cars to other airports and then fly maybe as many as four short sectors. At times the driving times have been as high as six hours, non-stop other than for quick 'pit stops' at motorway service areas. Even when two pilots share the driving this is quite tiring - over a long distance it is almost impossible to avoid a busy traffic time around some city or other.

Although such self-driving is a lot more exhausting than travel by taxi, train, or airline, it does not seem to count as a 'Sector' towards the permitted total. We have had cases in recent months where a crew has been on duty for over nine hours, much of it in a rental car before actually starting a flight.

Even long distance travel by taxi or minicab can be quite tiring - one never knows what the physical state of the cab driver might be, as I do not think that they are time limited in the way HGV drivers are. Certainly no HGV driver would be allowed to drive six hours with nothing more than short 'pit stops' so maybe it is time that CAA did something about this. We are not an isolated case by any means - I had the same experience in a previous company and I know of others where it goes on.

In some recent cases, if the driving had counted as a sector, the last flying sector would not have been possible without going into 'Discretion'.

(2)

The VOR approach onto runway 05 at ### has an offset approach to give separation to a rocky outcrop over 300 feet high about one mile from the threshold. From 10 miles I decided to fly visual and inadvertently lined the aircraft up with the runway. At five miles I saw the rocky outcrop and adjusted the profile to the right to give the

correct separation. I believe my division of attention was impaired due to my busy schedule over the past 14 days.

My company's duty week runs from 0001 Friday to 2359 Thursday. I have just had two days off but at the end of the last 14 days I felt really tired. I am medically fit and I don't think I really had sufficient time to recover from a three-day trip sequence. At the end of the duty sequence my seven-day total duty was 62:45 and my 14-day total was 96:55. None of these flights were subject to a discretion report or unforeseen delays and were deliberately rostered that way.

Where a Hire Car is used for positioning prior to or following a duty, I did the driving, as is normally the case for positioning crew in my company.

The CAA (SRG) proposals to amend CAP 371 in FODCOM 29/2002 include changing the definition of a Duty Week from that described in this report to a rolling seven-day period.

The use of self-drive vehicles for positioning is not permitted within the CAP 371 guidelines, but CAA (SRG) may approve the use of a self-drive vehicle in particular circumstances; this would be a variation to the AOC Holder's Approved FTL scheme.

EARLY/LATE DUTY PERIODS

The manner in which successive Early/Late duties are sequenced within a roster pattern can significantly influence the level of fatigue experienced by some individuals. This type of problem has been reported before and continues to be the source of adverse comment in some operations.

(1)

In the airline I work for, generally we are rostered to start the working week on lates with one or two middle duties, and finish the week on early duties.

The roster pattern occasionally changes to the following:

- Day 1 - Early duty 0600L report
- Day 2 - Late four-sector duty
- Day 3 - Middle duty
- Day 4 - Early four-sector duty

Starting the week on lates and finishing on earlies is tiring, but generally manageable. However, starting the week on earlies, going straight into lates to eventually finish on an early duty is very tiring and in my opinion causes fatigue. On Day 2, I find myself waking up at around 0600L with the possibility of finishing the day's work at 2230L, assuming the last flight arrives on time!!

Is this a safe way of rostering pilots?

(2)

Failure of CAP 371 to protect crews and therefore passengers.

Recent roster as follows: Two earlyies with wake-up at 0400. After 2nd early, take afternoon nap and stay up until 0100 to prepare for following duties - two lates with bed after 0100. After last late up at 0900. That day the next duty is a home standby from 1900 to 0200. Not tired due to bed after midnight on last three nights but go to bed at 2000 (how many would even attempt that?). Don't sleep well until phone rings at 0100 (the time I had been going to bed the last three nights!). Total sleep about 3 to 4 hours.

Expected to report at 0400. The crewing department needn't call until 0300, but that would have been after my official standby period and I would not have been obliged to work. Unable to get back to sleep so get up and report at 0400.

Depart my home base at 0500 to destination and return to a different base. Taxi to home base to finish duty at 1330. Drive 1.25 hours home. Total duty period 18.5 hours. Total sleep 3 to 4 hours.

Under the provisions of CAP 371 this type of duty is 'legal', but I believe it is totally unreasonable and unacceptable. The human body circadian rhythm cannot cope with this abuse. How can any management (and the CAA for that matter) justify this as a safe way to operate? I could have refused but bear in mind, my company has a reputation of disciplinary procedure against anyone who refuses a duty through fatigue, if the duty that is required is 'legal' under CAP 371.

After 18.5 hours duty, of which 3 to 4 hours was sleep, I then drive 1.25 hours home. If I fell asleep on the way home and wandered onto a railway track resulting in prosecution and threatened with imprisonment would my company be liable?

CAP 371 (Para.2.1) includes the following statement: "Aircraft operators are expected to appreciate the relationship between the frequency, pattern of scheduled flying duty periods and rest periods and time off, and give due consideration to the cumulative effects of working long hours interspersed with minimum rest."

Para 3.1 states: "...Training for Rostering Staff must include guidance on the effects of disturbing Circadian Rhythms, and sleep deprivation...."

Some operators make specific provision for flight and cabin crews on completion of an extended Duty Period.

UNDERSLUNG LOADING - A SAFETY LESSON

An underslung load was stowed on a wooden pallet with two cargo straps around the load attached to a hook and 20m of chain. During one of the flights the load broke free and dropped clear, but the remaining debris attached to the hook swung aft under the airloads of forward flight. The 20m chain is specifically used by the Company to allow a load to swing up behind and clear of the tail rotor in just this sort of case. This is what happened, although the chain did strike the lower fin, as witness marks in the paint revealed following the subsequent engineering inspection.

An internal company incident report was filed by the Pilot, but the incident was not well publicised. Subsequently, a company memo was issued regarding load security, prompted by a fatal accident in similar circumstances; the memo contained a veiled reference to a "recent incident" involving a company aircraft, but no-one seemed to know to what this referred.

There is a feeling amongst the pilots that incident reports are not being allowed out of the Company. One pilot has told me that he was instructed not to file an MOR following an incident - something which upset him at the time but which he didn't take further.

The option exists for an individual to file a MOR directly with CAA (SRG). Details on this procedure are contained in CAP 382 - The Mandatory Occurrence Reporting Scheme.

The importance of raising awareness as widely as possible to "close call" incidents cannot be overstated. Investigations into many accidents reveal similar precursor incidents.

There are rarely 'new' accidents - but many 'old' accidents involving 'new' individuals.

DO UNTO OTHERS AS ?

We were parked on Stand ## at (a UK regional airport) with another company's aircraft parked on the adjacent stand. The stand layout is such that if an aircraft is pushed back from the adjacent stand it 'blocks' any aircraft on Stand ## from taxiing until the aircraft from the adjacent stand has taxied clear.

As we closed our doors, the crew of the other aircraft (ABC 123) called for pushback and start. My understanding is that the request for pushback implies that an aircraft is ready to move. The other aircraft was however clearly not ready - the cargo door was open with a loading ramp attached and the passenger door open with the steps down. Despite this, Ground Control approved their pushback and then subsequently approved our push. As we went backwards our

neighbour, not surprisingly, stayed where he was whilst his doors were closed. Ground eventually questioned them about the delay to which they replied that it was due to a 'problem locking one of our doors'. Ground told them to hold position and report ready for push.

With our push and after-start checks complete, we were ready to start taxiing, but the other aircraft then called that they were ready. We were very surprised that Ground gave them a second approval for pushback considering that it would block us in whilst they pushed and started. It soon became apparent that the other aircraft was still not ready, as after some delay with no movement Ground told them to hold position, so finally allowing us the chance to request taxi. Despite their determination to depart ahead of us, I do not believe that the other aircraft was constrained by any departure slot time.

There was little direct flight safety impact of this incident, but the effect on my state of mind just before getting airborne was marked. The other crew's aggressive attitude and determination to get away before us induced in me what can best be described as the flight deck version of road rage.

Whilst we all accept the commercial pressures for short turnarounds, this type of behaviour, at best described as unprofessional, can only serve to anger other crews.

LARS AVAILABILITY

On a hazy day with approximately 7km visibility, ### ATC was very busy with a TRA in force and hence no Radar Information Service was available, we suffered an Airprox, head-on with less than 200ft separation, no TCAS warning, which we duly reported.

My concern is this:

Without the provision of a London Lower Airspace Radar Service (LARS) there will be a mid-air around the London CTA. Aircraft are squeezed by the airspace: Heathrow, Luton, Gatwick, City, Wycombe, White Waltham, Denham, Elstree, Stapleford and by altitude: less than 2,400ft.

The turnaround for Airprox reports is now 4-5 months. This data needs to be urgently collated and used as evidence to provide a London LARS service. We are flying over highly populated areas and the result of a mid-air would be catastrophic. Please for the expenditure of a paltry amount of money in the scheme of things, let's get it sorted and be pre-emptive instead of dealing with yet another disaster.

CAA (SRG), which has the responsibility for investigating Airprox and other reports of near misses, conducts reviews of this information regularly. On the basis of the number of reports filed, there is no

evidence to show that the risk of collision is higher in the airspace referenced in the report.

There is anecdotal evidence that many near-miss incidents in the vicinity of the London TMA go unreported; if this should be the case, the importance of submitting reports to provide accurate information on Airprox 'hot-spots' is obvious.

FLIGHT CREW COMMENTS

FLIGHT DECK/CABIN COMMUNICATIONS

(1)

Following on from your report "Cabin Crew Buzzer" in Issue 64 (October 2002), I would like to point out the other problem of Flight Deck/Cabin Crew communication post Sept 11th and the 'locked door' policy. We have the same procedure whereby the Cabin Crew communicate with the Flight Deck via the intercom and it can be a distraction on this particular fleet. Some Captains specifically brief the Cabin Crew along the lines "don't call us, we'll call you". I believe this to present its own safety hazard.

It was my second consecutive night duty and the Captain's first. Approx 1½ hours into the flight, the Captain asked me if I minded him "resting his eyes for a short while" I did not because not only do we permit rest breaks but it was his sector and it would obviously be better if he was refreshed and alert for the approach and landing.

Our old (pre-Sept 11th) SOPs called for a crew member to be called in from the cabin to keep an eye on the other pilot and I suggested this to the Captain: "Don't bother, they're busy back there anyway" or words to that effect was the response. After one hour and 15 minutes the Captain awoke and I had been entirely devoid of any communication with anyone on board the aircraft for this time - what if I'd fallen asleep too? We were flying towards a small group of islands in a very large ocean.

Can you guess what happened on the return sector? A plausible explanation was given as to why it was necessary and the Captain took another cat nap. This time for two hours. Yes, I could have buzzed the crew at any time for strong coffee and yes, I would have woken the Captain - but only if I was awake myself!

The old system of checking the Flight Deck every 20 minutes is failing because:

- a) They cannot get into the flight deck
- b) They don't like using the buzzer because they think they might be causing a "serious safety hazard".

(2)

I read with interest the first two Cabin Crew reports contained in FEEDBACK Issue 64. I am certain this refers to my company as related conversations take place on many of my flights.

Despite a huge CRM training initiative over recent years, my company continues to have a long-standing culture of rivalry, mistrust and jealousy between many of its flight and cabin crew. This leads to many basic misunderstandings. If everybody made an effort to treat each other with respect, explain the reasons behind their requests and communicate their concerns many of these misunderstandings would not occur.

Specifically relating to the 20-minute call to the flight deck, I have had cabin crew tell me that on previous flights the flight crew asked them not to call because they would be taking rest, and then spent hours worrying that BOTH flight crew were asleep because nobody phoned them from the flight deck. All crew have a responsibility for the safe conduct of the flight. Surely if the cabin crew were THAT worried they were negligent in not phoning the flight crew and checking that everything was normal?

When operating with minimum (i.e. 2) flight crew, my company allows and indeed encourages sleep periods in the seat during cruise of up to 45 minutes. The cabin crew are required by SOP to contact the flight crew every 20 minutes to check all is well. As the flight deck door is bolted from the inside the cabin crew can only contact the flight crew by interphone. The loud bong produced by the inbound phone call would wake the dead. The sleeping crew member would have his/her rest disturbed at least twice. The commander has the discretion to vary SOP as he/she sees fit to suit the circumstances. It is not unreasonable to ask the cabin crew to refrain from initiating non-urgent calls to the flight deck for the hour and a half or so when the flight crew are trying to sleep in their seats. Equally out of consideration for the cabin crew the flight crew should phone them every 20 minutes to report that all is well, this satisfies the SOP requirement for cabin crew to contact the flight crew. If that call is not forthcoming, the cabin crew MUST contact the flight crew to check that all is well - not to do so would be negligent. It helps if the flight crew set the tone by inviting the cabin crew to phone if an unreasonably long period of time elapses without contact or if they are in any way concerned about anything at all.

Good communication sounds simple but is incredibly difficult to achieve. It would help enormously if all that baggage of rivalry, mistrust and jealousy between the cabin and flight crew could be put to one side. Start by patiently explaining your position and reasons, be prepared to listen to the other point of view and agree a compromise you can all live with.

Good CRM and effective communication between the flight deck and cabin can be greatly enhanced if the SOPs are appropriate. As noted in FB 64, company procedures agreed with CAA (SRG) and published in the Operations Manual must be adhered to and should not be changed on an ad hoc basis without Operations Manual amendment; this can only lead to confusion between crew members.

If either flight deck crew or cabin crew members find that existing SOPs are not appropriate, these difficulties should be reported through the relevant company procedures to permit the matter to be reviewed.

HELICOPTER 'A' CHECKS (FB64)

I could not believe my eyes when reading the article entitled Helicopter 'A' Checks in FEEDBACK Issue No. 64. As an experienced Helicopter Pilot and Instructor for many years, I am appalled that this sort of practice may exist amongst North Sea operators, an area of helicopter operations that has been highly respected for its professionalism up till now. Many Public Transport helicopter pilots like myself are required to perform the mandatory 'A' Check on their aircraft before flight, or during a period of continuous operation. By their very nature, helicopter 'A' Checks are relatively straightforward and do not take very long to carry out. The safety of the travelling public would be in serious jeopardy if the majority of pilots did not do it correctly and to the best of their ability, notwithstanding the legal implications from a subsequent Board of Enquiry. The author's comments throw up a number of issues to which I offer the following:

- FTL regulations allow a period of 30 minutes duty time prior to flight for pre-flight actions such as this.
- Apart from prevailing weather conditions, an offshore installation is no more hostile than a helipad at a hotel or hospital. If 'A' Check's are regularly anticipated at the same location, engineering resources can be pre-positioned.
- The lack of foul weather clothing is a poor excuse for not maintaining the aircraft properly. This sounds like a company failing.
- The risk of something breaking or a component failing is actually increased by these checks not being carried out. The intricacies of the actual check itself can be easily taught to sensible aircrew, thereby minimising the risk of being stranded.
- An individual's lack of propensity towards things mechanical can be identified during properly constituted training and annual renewal checks. If

not suited, the 'A' Check can be done by the other crew member(s).

- Just because an aircraft did not fall out of the sky on the previous flight, it does mean to say that there is no risk whatsoever of it doing so on the next one!
- A sequence of actions constituting a formal 'A' Check should not be intentionally disrupted or interspersed with other tasks. As every good pilot should know, thus can lead to cognitive failures and omissions.

And finally:

The ANO Part VII, Article 83 states that it is an offence to knowingly make or assist in the making of a false entry in a regulated maintenance record or to issue a certificate that is not known to be correct.

Despite the questionable legal position of a pilot and their company regarding possible false maintenance records or the lack of mandatory checks, the confidence of passengers and subsequent integrity of the company would be seriously affected if such practice became commonplace amongst all operators. Let all who read this be assured that it is not!

IN CHARGE - BUT OF WHAT?

Over the last couple of years I have become increasingly concerned about both the attitude and training of some cabin crew with whom I fly. The majority of cabin crew believe that the 'In Charge' is in charge of the aircraft and that the pilots are merely there to get the aircraft from A to B.

One example of this came up in conversation with a cabin crew member recently:

Their opinion was that the 'In Charge' was in charge of everything that went on inside the cabin, the Captain having no jurisdiction. I asked what they would do if the Captain requested them to do something, "Well I'd check with the 'In Charge' to see if it was OK". I pursued this line of questioning enquiring what would happen if the 'In Charge' disagreed with the Captain, they answered that they would do what the 'In Charge' told them!

We could attribute this to many causes, the fact that flight operations and cabin services are separate departments within this airline; the fallout from 11th September 2001 and the introduction of the locked door (out of sight - out of mind) policy; the training that the cabin crew receive and others.

The opinion that the 'In Charge' in charge is widely held among the cabin crew community, reinforced during their initial training, where they are told that 'In Charge' is God, and flight crew have little relevance to them.

Another example that would have been amusing if not true was a very experienced senior cabin crew member who finally admitted that the Captain may be in command, followed by the 'In Charge' with the two (long haul) First Officers "just learning"!

The interesting thing is that the majority of crew hold no malice in this opinion, they genuinely believe (through training and perhaps reinforced by both their departmental management and union(s) that this is the case. Any mention of legal responsibility and of the Air Navigation Order is met with total bewilderment.

It has got to the point that I and many of my colleagues fear it is only a matter of time before such attitudes and misunderstandings will risk a minor incident becoming much more.

Perhaps the most startling example was a First Officer transferring the Cabin Defect Log to the aircraft Technical Log at the end of the flight. He came across an entry indicating that 2 BCF's had been used at the rear of the aircraft. On enquiring he discovered that there had been an oven fire but the 'In Charge' decided it was not necessary to inform the flight crew.

This report was included in the latest issue of the CABIN CREW FEEDBACK newsletter, together with the following comment:

JAR-Ops Sub Part N Flight Crew states: "One pilot amongst the flight crew, qualified as a pilot-in-command and in accordance with JAR Flight Crew Licensing, is designated as the commander ..."

JAR Ops Sub Part O Cabin Crew states: "The senior cabin crew member shall have responsibility to the commander for the conduct and co-ordination of normal and emergency procedures ..."

The In Charge remains responsible to the Aircraft Commander for the supervision of cabin services and cabin/passenger safety.

Most company SOPs require that any incident in the cabin is to be communicated to the flight deck as soon as practical.

CABIN CREW REPORTS

Cabin Crew Reports received in Period: 18

DOOR SERVICEABILITY

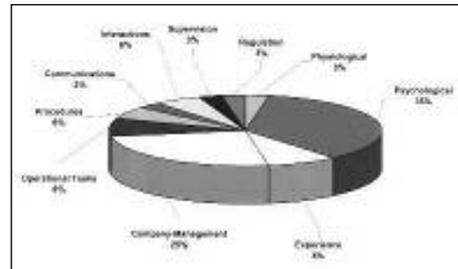
I had overall responsibility for L&R # Doors.

We landed into AAA and the request to disarm and cross check doors was carried out. My colleague and I were unable to disarm Door L#. We attempted this procedure a dozen times or more with the passengers having to disembark via a different door. The emergency light had extinguished and the yellow emergency placard

ENGINEERING REPORTS

Engineering Reports received in Period: 8

Key Areas:



TO SIGN OR NOT TO SIGN?

I work as a mechanical LAE and was asked to certify a hydraulic component that had been taken off an aircraft that had lain idle, grounded, for over two years. I refused on the grounds that the component was just lying on a bench with no paperwork. Our Quality Department had said some months earlier that any components removed from this aircraft must be sent to workshops for testing and certifying before fitment to any other aircraft. This was due to the fact that the hydraulic oil could be contaminated with water or it could have started to breakdown chemically through lack of use.

A manager then accused me of trying to ground the aircraft and delaying a flight scheduled for the next day, so I said, "Well get another LAE to certify it", but no other LAE would do so.

What I want to know is, am I right to stand my ground on this? Is it right for a manager to use commercial pressure to try and make me change my mind?

The holder of a licence is duty bound to ensure that the work he/she signs for is in compliance with all airworthiness requirements and to resist any pressures to the contrary.



Anything to report?
Try CHIRP!

had retracted, but the arming lever would not move fully to disarmed position, therefore the disarmed flap was not visible. We got onto our hands and knees and lifted the rubber flap at the bottom of the door to check if the slide was disengaged. It was not, the slide was still engaged as far as we could see. Once all the passengers had disembarked both flight crew attempted to disarm the door and both confirmed they were unable to successfully do so. This was now an inoperative exit. The Captain said that this was a 'grey area' and we would return home as normal. As far as we were concerned an inoperative exit, according to our SEP Manual, states we should reduce our passenger load by 50 and re-seat passengers away from this exit, this exit should not then be referred to during our safety video.

As L# was my exit and I had overall responsibility for both L&R Doors, I was not happy with being told to operate home 'as normal'.

I went onto the flight deck before passenger boarding and expressed both my concerns and opinion to our Captain who clearly was not interested and we continued home.

On arrival into BBB (UK) our engineer was unaware of the problem. Once he had boarded the aircraft and removed the bustle from the door to investigate, he confirmed that L# was inoperative. On further investigation he found the lanyard from the slideraft was caught in the door frame. Should we have had to use this exit in an emergency the slide would probably not have been able to inflate or be used as the lanyard would have restricted it from opening. Our engineer confirmed also we should have reduced our pax load and not referred to this exit during pax safety briefing.

I appreciate the Captain is in charge of our flight, but this is a very serious safety issue. Why is it in his opinion a 'grey area'? Why train cabin crew on operational procedures when clearly they are ignored?

This report has also been published in CABIN CREW FEEDBACK. It has been emphasised that a door or any other safety-related cabin defect should always be reported to the flight deck crew, as in this case.

Defects that are not sufficiently serious to prevent the aircraft being despatched are listed in the Minimum Equipment List (MEL), together with any specific requirements and/or checks which then must be applied. The decision to despatch in such circumstances rests with the Aircraft Commander. However, if there is any doubt that a door will be available for use in an emergency evacuation, it must be considered to be inoperative and the relevant MEL restrictions/procedures complied with.

SHIFTS & FATIGUE

Some time ago I filled in a questionnaire about shift patterns. I have heard no feedback or seen any changes to work patterns.

I am very concerned about the low morale that exists at present. Managers are pushing more and more work with less people and less time with everyone expected to do all tasks; jack-of-all-trades, master of none. With the present climate, we don't expect any improvement in pay or conditions, we don't also expect things to get worse year after year. There is a dangerous 'couldn't care less attitude' at present, due to stress, overwork and lack of manpower and resources.

Recently we have been forced to start a seven-night shift pattern, which nobody wants and have fought hard against. Most people travel a long distance to get to work and after seven nights continuous, fatigue, exhaustion, and lethargy are all bound to set in, causing an increase in concern for everyone's safety at home and work.

Can the CAA or European Law look into shift patterns regarding Health and Safety?

The CAA commissioned Professor Simon Folkard of Swansea University to report on fatigue in aircraft maintenance, this report has been published and has been presented at recent seminars. The report comments on, for example, the relationship between fatigue and various work/shift patterns and the likely incidence of accidents. A regular seven-night shift pattern is potentially a more fatiguing pattern than other shorter night shift patterns, especially if proper rest is not achieved.

Professor Folkard's report is available on the Royal Aeronautical Society's website, www.raes-hfg.com/avmaint/reports/avmaint-fatigue-report.htm in the Human Factors Group section.

The EU has published a Working Time Directive that prescribes working hours, including those for nightshifts. Up to now, maintenance/engineering staff (and other ground staff) in the air transport industry have been exempt from its provisions, but this is due to change on 1 August 2003 when the Directive is due to be implemented.

ENGLISH - THE LANGUAGE OF AVIATION?

On several occasions recently I have noticed that many European operators are increasingly using their native language when recording defects in the Tech Log.

While I appreciate that your average European has a far better grasp of English than your average Brit has of French/German/Spanish, this practice can, and has, caused problems. I have had to ask flight crew to re-write

defects in English or translate. Also, on one European operator's aircraft, the MEL is in that Country's language only. Deferred Defects are also recorded in a language other than English.

I am not having a go at Foreigners nor am I anti-European, but the use of non-standard language WILL cause errors in fault diagnosis.

I am fortunate in that I am in a position that allows me to insist that a defect is translated before any action is recorded against it. Others may not be so fortunate.

In the case of the *foreign language* MEL I am baffled. My understanding was that all JAR145 companies would operate with near identical procedures, documentation, manuals etc. If this is not the case then what does the 'J' mean in JARS?

English is the ICAO recognised aviation language, however, JAR-66.15(b) requires that a licence holder is competent in the language(s) of the maintenance documentation etc in use: this is second nature to most European operators.

Also, JAR-OPS and JAR-145 requires that the AOC holder must be satisfied that where work is contracted out the contractor is competent in the languages used in the relevant operational/maintenance manuals and documentation.

ENGINEERING COMMENTS

LICENCE CONVERSION

I have a simple problem, which the CAA agrees is crazy yet, refuses to address.

My problem is that I cannot certify a daily without a JAR-66 'A' licence. I hold a full JAR-66 B2 Licence that I have just converted (what a nightmare that was) and I have worked on modern aircraft for in excess of 25 years. I find it ridiculous that I have to get YET another licence after spending the last 3 years getting a B2. When I spoke at length on the problem to the CAA, the answer to me was as follows:

'In this transition from BCAR to JAR-66 there are winners and there are losers. I am sorry to say you are a loser mate!'

I have no choice if I wish to continue in this industry for the next 15 years but to get a fudged JAR-66 B1 just so I can carry out a daily. I will do this without any further training in the skills of the Airframe/Engine Engineer. How safe or sensible is that!!

An 'A' licence can be obtained from the CAA, with limitations if appropriate, if an applicant provides sufficient information as to their past authorisation, relevant experience and qualifications.

**CAA (SRG) AIR TRAFFIC SERVICES
INFORMATION NOTICES
(ATSINS)**

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

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

www.caa.co.uk/publications/publications.asp?action=sercat&id=2

Number 20

Reporting of All Birdstrike and "Near Miss" Incidents with Birds - Reminder to Airport Operators and their ATS providers of their obligation to report all birdstrikes and to encourage airlines/others who may file reports to copy them to the aerodrome, whatever the type of aircraft/degree of damage.

Number 21

CAA Publications - Advice to air traffic service provider organisations of the arrangements for obtaining CAA publications.

Number 22

"Runway Vacated" - Option to define terms "runway vacated" and "clear of the runway" in Manual of Air Traffic Services Part 2.

E-MAIL REPORTS

Recently, we have received reports by e-mail, in which the reporter has given their name but no other contact information. Subsequently, we have been unable to contact the reporter through the e-mail address given.

If you elect to submit a report electronically, please provide alternative contact information; this will not be retained and will be returned to you when the report is closed, in accordance with our usual procedure.

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

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

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

25/2002

1. Oceanic Airspace Clearances - Airprox incident due to an Oceanic Boundary estimate being given one hour later than was actually the case.

26/2002

ETOPS Pre-departure Service Check (PDSC) - Training and authorisation of flight crew; PDSC validity.

27/2002

1. Use of Rudder on Large Transport Aeroplanes - Pilot Awareness; Training.
2. Twin Turbo-prop/piston Accident and Serious Incident Review - Analysis of all accidents and serious incidents to these types of PT aircraft between 1998 and 2001

28/2002

1. APU Failure Due to Neat De-icing Fluid Entering the APU Inlet - Reported US incidents of uncontained failures of APU turbine wheels due to an over-speed condition caused by the ingestion of neat de-icing fluid

29/2002

1. Second Letter of Consultation: Proposal to Amend The Air Navigation Order 2000 - Proposal to amend Civil Aviation Publication (CAP) 371 for the purpose of clarifying the texts to reflect current interpretations and practices

30/2002

1. Letter of Consultation: Proposal to Amend Air Navigation Order 2000 - Proposal to introduce Article 34A into the Air Navigation Order 2000 requiring operators of aeroplanes with a maximum total weight authorised in excess of 27,000kg flying for the purpose of public transport to have a flight data monitoring programme as part of their accident prevention and flight safety programme.

Special Communication 8/2002

1. Alleviation for flight deck doors and Interphone Systems - Revised Master Minimum Equipment List (MMEL) alleviation policy.