

FEEDBACK

Issue No: 67

Summer 2003

EDITORIAL

FOD COM 9/2003 - RE RADAR CONTROL IN CLASS D AIRSPACE

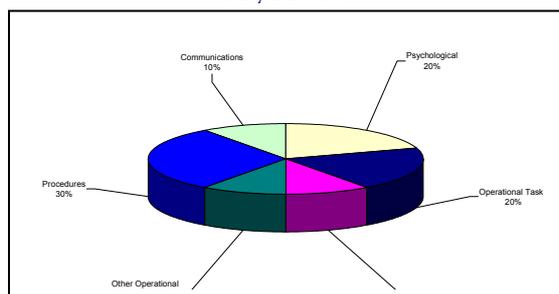
FODCOM 9/2003 highlights a UK Airprox Board investigation into a recent Airprox incident. The investigation indicated that many pilots do not fully appreciate the implications of operating within Class D airspace under a 'Radar Control' Service, and believe that a Radar Control service in Class D airspace will assure them of separation from all other traffic. This is not the case, as separation is only provided between traffic operating under IFR or Special VFR

Details of all classes of airspace within the UK, the services provided in each type, the separation provided and VMC minima where appropriate are published in the Aeronautical Information Publication (AIP) Part 2 ENR 1.4 and are also available on the CAA website at: www.caa.co.uk/docs/64/ATS_Classifications.pdf.

ATC REPORTS

ATC Reports received in Period: 5

Key Areas:



LAKES SECTOR CONFIGURATIONS

Following the publication of the report titled 'Resectorisation Procedures' in FEEDBACK 66, we received a number of further telephone calls/reports on the same topic of which the following is representative.

I read with interest the article about Sector 3/4/7 bandboxing (*combining sectors*) and know that this person is not a lone voice. I too have serious doubts about the safety of the S3 and S7 bandbox. I am also worried about the reply you have published from the relevant organisations.

I am somewhat confused by the line "CHIRP was advised that the practice of combining etc etc". Correct, we combine S3 + S4 + S7 when demand is low or more usually when we have no staff and flow measures are in place.

The S3/S7 + S4 split is to be used to get as much traffic through the sector as possible. Previously at LATCC when we could split S3 + S4 + S7, S3 was the most difficult sector. S3 worked Scottish TMA departures and most of the London TMA departures (either because they couldn't make a S4 level or didn't want a S4 level). The S3 controller is often involved in multiple vectoring scenarios and does not need the added aggravation of a range set on the radar that is inappropriate to the task. Add this to the scenario of Manchester TMA departures via BAGSO and traffic in and out of DUB and the workload is far too high.

This bandbox is a case of expediency and nothing else. NATS needs to reduce the delays through the sector and this bandbox is not a safe way of achieving it.

The continuing concerns on this topic were represented to CAA (SRG) for consideration in the ongoing discussions with the service provider. Subsequently, CAA (SRG) and NATS provided this response

The introduction of a S3/7 combination with S4 split configuration has been the subject of ongoing discussion and correspondence between SRG and the service provider. However, the Unit management has recently endorsed the recommendation made by the Lakes Working Group that this sector configuration be withdrawn. This recommendation followed an analysis by the working group of comments made by some staff.

An Air Transport Safety Newsletter

from the Confidential Human Factors Incident Reporting Programme

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

You can also e-mail us at confidential@chirp.co.uk - visit our website at www.chirp.co.uk

NEED TO CONTACT US?

Peter Tait Director
Flight Crew/ATC Reports

David Johnson Deputy Director (Engineering)
Eng/Maintenance Reports

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

~OOO~

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

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

CHANGE OF ADDRESS?

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

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

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

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

REPRODUCTION OF FEEDBACK

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

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

Registered in England No: 3253764 Registered Charity: 1058262

FEWER AIRLINES - MORE CALL SIGN CONFUSION

Unfortunately this is not the first time I've felt the need to report on the occurrence of similar callsigns.

Within the space of several days we've not only had several similar callsign incidents but now a multiple of similar callsigns together!

I work at LTCC providing radar services for the London TMA airfields. The problem would seem to have arisen from the merger of the "low cost" airlines into two big companies AAA and BBB.

Just this week we've seen AAA123/BBB123 together, AAA5AB/BBB9AB also. My colleague had four inbound aircraft at the same time all displaying worryingly similar callsigns, again from the same companies.

With the increasing levels of traffic, coupled with the complexity of airspace around the airfields, there is very little margin of error in providing air traffic services to the airport.

It is my belief that careful and particular attention must be given to the callsigns that companies allocate at this airfield, otherwise it would easily become a factor in any future incident that may occur!

More than 100 Mandatory Occurrence Reports relating to callsign confusion have been submitted this year. It is important that all incidents of this type that are assessed as being potentially dangerous are reported to permit follow up action to be taken, where this is deemed to be appropriate.

ATC COMMENTS

ATC UNDER PRESSURE - A COMMENT

In relation to the item " ATC Under Pressure "in FEEDBACK 65 and Flight Crew Reports regarding approach sequencing, the following information may be of use

It may not be widely appreciated that - at least in the case of LHR - the ILS glideslopes are only flight-checked (by the calibrator aircraft contracted by CAA) out to 10 miles or 3,000 feet. We have re-checked this point with the appropriate manager at LHR. He stated that the glideslopes are "not guaranteed above 3,000 ft and are only promulgated to 3,000 ft or 10 miles ".

At one time it was standard practice at LHR to put aircraft on the Localiser at 3,000 ft, so as to intercept the glideslope within the tolerances. With the coming of London City and its CAS, the lowest Localiser altitude became 4,000 ft, until roughly Tower Bridge when on 27L & R. Inexorably, humans being mere humans, this

has become the norm in about 90% of cases, the exceptions being those (few) controllers who appreciate this, and those (few) commanders who equally appreciate the "unchecked" glideslope implications. These are usually experienced long-haul pilots, who probably remember the earlier B747-100/200 equipment which was at times quite slow to "number crunch" the data so as to properly capture the glideslope.

Currently, a few commanders will request descent from 4,000 ft to 3,000 ft while on the Localiser. They are probably aware that to capture/attempt to capture the glideslope outside the promulgated coverage cannot be in accordance with SOP's and that they could accordingly end up carrying the can. Some good while back, reported in a company Safety Review magazine, was a BAC 1-11 incident at Manchester when the aeroplane when attempting to capture the glideslope from 4,000ft on the 24ILS (had been put there due terrain) suddenly pitched up very sharply causing everyone considerable concern. The investigation was simply "opened and closed" with the statement that false glideslopes could never be discounted outside the promulgated coverage.

Such circumstances have been likened to a Television (the frequencies are similar) with a portable antenna in the same room. At one time, reception was frequently terrible, but sometimes ok. As Television receivers have improved, we can obtain a satisfactory signal most of the time - but we cannot rely on it. Some may think, as I do, that the CAA are not up to speed on this one - probably, UK glideslopes now ought to be promulgated, or "Certificated" out to 4,000 ft or 12 miles, regardless of any ICAO differences.

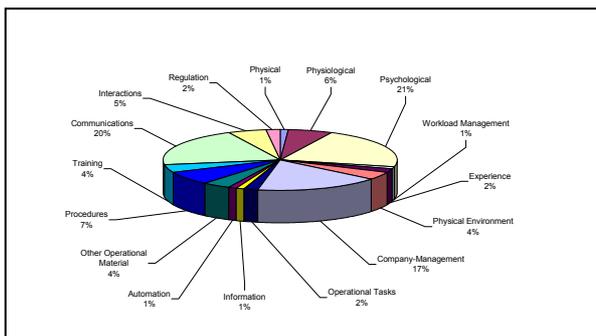
The glideslope calibration limits are as stated. If capturing the glideslope outside 10 miles 3,000ft, it is prudent to monitor the aircraft's vertical position using other available aids.

(Further comment on this topic is on Page 6.)

FLIGHT CREW REPORTS

Flight Crew Reports received in Period: 42

Key Areas:



LEVEL BUSTS - ALTITUDE VS FL

I recently reviewed a letter from the local ATSU management distributed to the various user airlines, highlighting the ongoing problem of level busts particularly during Standard Instrument Departures (SIDs) where departing aircraft were levelling at 6,000' instead of Flight Level (FL) 60, as the SID procedure requires.

This is my home base, and I must say that the problem was of no surprise to me. Our training and SOP's dwell on repetition, by doing things in a routine way, we hope not to miss anything out. Pilots who fly routinely from AAA set 1013mb almost instinctively during the SID.

I was caught out earlier this year when I was called out to fly from another UK regional airport and on reaching forward during the SID to set 1013mb, remembered that the SID's there are to altitudes not FLs. Fortunately even if I had set 1013mb, the QNH for the day was in our favour and we would not have bust the level but would have levelled some 200ft early. Even though we had briefed the altitude only some 30 minutes earlier, habit had crept in.

I dare say that the level busts referred to in the ATSU letter are probably the work of pilots who are not based at AAA and regularly use altitudes on their departures. I have discussed my experiences with ATC representatives. It appears that this and one other UK airport seem to be the exception. I have suggested that we would help to limit this problem of level busts by coming more into line with most UK airfields by redesigning the SID's transition levels etc. I understand that this has been looked at before and to change the procedures would not be straightforward ... I didn't expect it to be. One consequence is that it would mean the loss of some holding levels, but surely this could be worked around. Since the initial discussions on the subject there appears to have been a loss of momentum and it was suggested that a CHIRP of this nature may help to stimulate further discussions to move the proposal forward.

Of course, as pilots we are not totally funnelled in our thinking, we operate all over the world from many different airports and we hopefully do what we brief, but the use of FL's on departure is a rarity at most airfields and the need for the ATSU to promulgate this letter would suggest that people are obviously getting caught out often enough to cause a safety concern. Perhaps if the procedure could be changed, then safety may directly benefit as a result.

The requirement to set 1013mb prior to the SID altitude limit presents a classic Human Factors trap, as the reporter notes, particularly for flight crew that do not routinely operate out of these airfields. Similarly,

pilots based at these airports must adopt a different SOP whenever performing SIDs at other destinations.

The continuing concerns of pilots and ATCOs to the present procedures have again been represented to the Directorate of Airspace Policy.

WHO AM I? - WHERE AM I?

I would like to comment on the renumbering of stands at LHR. To summarise, in most cases the old prefix letters (B, C, D etc) have been removed, and a third digit added in front of the old stand numbers: 1 for Terminal One, 2 for Terminal 2 etc. It sounds logical enough. However, the old system of grouping stands together had significant advantages in terms of increasing situational awareness. There are over 50 stands on Terminal One, and it is unlikely that a pilot can remember all of their locations. It used to be very easy to know the approximate location of stand C24: it was in the Charlie cul-de-sac. Now however, it might be necessary to consult the aerodrome booklet to locate the new stand 124.

Does this matter? Yes, because frequently at LHR one does not receive a stand allocation until after landing and whilst vacating the runway. This is already a time of high workload, with the need to ensure clear of the runway, change frequency and carry out the after landing checklist. The additional distraction of having to physically check a ramp chart at the same time is not an improvement to flight safety. Some stands at LHR are very close to the runway turnoff points: for example, 27R and the old Novembers. An otherwise prudent decision to taxi clear of the runway, complete the after landing checks, and then locate stand 178 might result in having already missed the stand.

Also, the ability to reduce R/T by referring to the old prefixes - "right onto the inner at the Bravos", "hold abeam the Charlies" etc, has been lost. We now have the farcical situation where both ATC and pilots, particularly at busy periods, refer variously to "the old Charlies", "where the Tangos used to be", "the area formerly known as the Victors" and so on. This may be poor R/T discipline, but it is still easier than the new alternatives. Surely the point is that the old system was better, reduced R/T, increased situational awareness and therefore improved flight safety.

A further related problem has emerged. Yesterday, on a taxi frequency, callsign confusion took place between ATC and an aircraft in the Central Area. As it was sorted out it became clear that the aircraft had been using its Stand No. as its callsign. ATC remarked, in consolation perhaps, "Don't think you're the first to do this - it's happening quite often". Then followed an exchange between various aircraft and ATC about the new Stand numbering, and the wish that we could go

back to the old system. ATC concurred. It is pretty fair to say that all this is making an already difficult peak period Heathrow even more difficult.

So, why have the stand numbers been changed? Presumably, it is in an effort to comply with new JAR recommendations. Sadly, the desire to satisfy Brussels bureaucracy is not a good enough reason to increase workload and reduce safety at LHR. Would it be possible to reinstate the old prefixes, and thereby refer to stand 124 as C124? This would have the advantage of being a no cost solution. It would also, surely, be very close to satisfying the new JAR requirements. If not, then this could be notified as a variation to ICAO/JAR rules due to local circumstances.

I have just operated to CDG. Regular visitors will be familiar with the non-standard use of French language by ATC, which presumably has long since been notified as a local variation to ICAO requirements. However, it was a pleasure to be directed to stand Y6, since I was immediately able to locate its approximate position. There are no imminent signs of any changes in the stand designations at CDG, and I am bound to say that on this occasion the French have got it right.

The changes were introduced by the Airport Authority to comply with ICAO standards, not JARs as suggested.

A change of this nature might be expected to cause some initial difficulties, but it remains to be seen whether similar difficulties will continue to be reported, as was the case when another major UK airport introduced ICAO runway/taxiway designators. It is important that any incident that endangers an aircraft or, in different circumstances, could create a safety hazard should be reported through the MOR scheme.

Concerns similar to those in this report have also been expressed verbally by some pilots and ATCOs. The views of other LHR-based pilots/ATCOs on the new numbering would be welcomed.

RUSHED DEPARTURE - DELAYED ARRIVAL

Our scheduled departure time from AAA to BBB was 1130, report time at the crewroom 1045. The Cabin Crew and I were on time but the First Officer arrived about 5 minutes late at 1050. We then walked to the aircraft arriving there at about 1100. The handling agent was contacted by radio and asked to arrange to have the aircraft towed to the departure stand and to call the refuellers. At this time the engineer was at the aircraft, having completed the daily inspection, and was just about to remove the nose gear safety pin. I asked him to leave the pin in place as the aircraft was to be towed. I then carried out my walk around check.

The refuellers arrived at the aircraft at about 1110 and fuelling was complete at about 1115. We then towed the aircraft to the departure stand arriving there at about 1120; there was a slight ATC delay to the tow. During the tow the First Officer and I discussed the fact that the nose gear safety pin was still in place and would have to be removed. On arriving at the departure stand I went to collect the weather to find that there were no upper wind charts available, there was a further delay whilst an attempt was made to download the charts from the computer.

I arrived back at the aircraft at about 1127 just as the first passengers were boarding. I boarded the aircraft and the First Officer and I carried out the pre start checks, started the engines, completed the after start checks and we taxied off stand at 1140.

After take off, I was handling pilot, the nose gear did not retract and we both realised that the nose gear pin had not been removed. As we were considerably over maximum landing weight we decided to continue to BBB with the nose gear down, as we would have been well on the way there by the time we were at maximum landing weight. The flight was uneventful although rather noisy due to wind noise in the gear bay and slow, as we had to keep within gear limiting speed.

How did this happen? We were rushed, as we did not arrive at the departure stand until 10 minutes before scheduled departure time, I was in the operations office getting a little frustrated at not being able to obtain all the weather information I required. On arriving back at the aircraft the passengers were boarding. The First Officer and I were both well aware that the pin had to be removed and we both forgot. Maybe a report time 45 minutes before departure is adequate if there are no delays in fuelling and towing but it leaves little scope for the inevitable day to day delays. The pin is attached to a red warning flag that the ground crewman, who removed the nose wheel chock, might have seen but he did not.

All in all not a flight I am proud of.

LOADING PROBLEMS

Some months ago, I encountered a cargo loading problem that illustrates the sort of problem ignorance of legal matters can cause.

The aircraft type that I fly is required to have a clear passageway from the flight deck to the tail bay of the main cabin. This is for reasons of dealing with inflight fires, etc. (and access to the loo).

On arriving at the aircraft, which was almost fully loaded, I pointed out to the loading crew that the payload obstructed the clearly marked walkway so that it was impossible for a crew member to get to the back.

I was not willing to fly the aeroplane in that condition, so instructed the loaders to reposition a large quantity of the cargo so that access would be possible. Their reaction was that the load was clearly going to bulk out and that was the only way they could get it on. I insisted that the aeroplane was not moving until it was loaded to my satisfaction, but the reaction of a somewhat 'Bolshie' young loader was that he 'would have to see his boss about this'.

Naturally, I made it quite clear that when he was on my aeroplane he would be wise to consider me his boss and either do as I say or get off the aeroplane right then - if he did not want airport security to come and remove him.

Happily he chose to comply without further ado, but I tend to feel that this kind of incident, which I am sure has taken place many times, could be avoided by employers giving better training/briefing to loaders. In fact all it would take would be one sheet of paper handed to them upon hiring which explained their duties and obligations vis-à-vis the Air Navigation Order.

After all, the ANO applies to EVERYONE - just as the Road Traffic Acts apply to pedestrians as well as motorists!

This report raises a number of issues related to the quality of the training of loading personnel and the operator's responsibilities for the oversight of contracted agencies.

ATIS - BEWARE

Changes to ATIS information are normally broadcast or passed to aircraft in the approach sequence as a matter of course. However, this is not always the case at some European destinations:

Arriving at ### (N. European International Airport), weather CAVOK, at about midnight UTC, the ATIS says Runway ## Left is in use for Landing, Runway ## Right for take-off.

We set up for ## Left. Air Traffic barely speak to us, just a couple of vectors from the STAR and then the instruction to: 'Report fully established on the ILS' (no confirmation of runway included). ATC adds that we are 'following a heavy at 7 miles'. We see the lights of the heavy and confirm we have him in sight, and a little later confirm fully established on approach. Then we notice that the jumbo we are following is on approach to the Right runway.

We make an RT call to check it is the Left Runway for Landing: 'Negative, Runway ##Right' (!!) I reply we will be repositioning for ## Right, adding that the ATIS reported landing Left, take off Right.

We reposition visually on to the approach to the other runway, quickly re-setting the nav aids in case of a go-around (the controller helps by passing the ILS frequency). I think to myself, what would have happened if the weather had been such that we couldn't have seen the other aircraft ahead...??

The reporter's concerns have been forwarded to Air Safety Support International, the recently formed CAA subsidiary, requesting that they be represented to the relevant Airport/Regulatory Authority.

A DIFFERENT LANGUAGE PROBLEM

Recently at a US East coast destination we were vectored to a left base for R/W ## and cleared for a visual approach. Deciding we were high, we requested a 'right hand orbit' which was approved and carried out.

Speaking to the tower after landing we discovered that the Americans do not use the term 'orbit' in this context, and thought we just wanted to go 'right a bit' so were somewhat confused.

I have to confess I don't know if 'orbit' is the official term for this manoeuvre, but it would seem that a "right hand 360" is the wording they use in the US.

The terms 'orbit' and 'three sixty turn' are both referenced in the CAA Radiotelephony Manual CAP 413 (Chapter 8 refers). 'Orbit' is also referenced in the relevant ICAO documents, however, my own experience is that the term 'three sixty turn' is more commonly used in the US.

DISCRETION/CREW REPORT TIMES

One of the decisions an Aircraft Commander has to make periodically, is whether to exercise his discretion to extend an allowed Flight Duty Period. Many factors influence this decision, and it is right that, on the day, the decision is left with the commander having taken account of individual crew members' circumstances. One of the many factors a commander will take into account is the flight duty start time.

I am concerned that my company is distorting the basis Commanders are working to, by making cabin crew report for duty before their official report time, so that they can carry out tasks which junior managers believe should be completed before duty 'proper' starts. Such tasks include: checking in suitcases for long-haul flights, reading and signing for crew notices, check counting personal floats, counting and declaring personal money (an anti-fraud measure), and pursers and number 2s preparing pre-flight briefings. Are these tasks not Duty?

Cabin crew are, therefore, being required to report for duty 20-30 minutes or more before their official FDP start time. This has gone so far that Cabin Crew Duty Managers are requiring In-Charge to make negative punctuality comments in personal appraisals if crew members are not at work well in advance of the report time shown on their roster.

A Flight Duty time is just that. How can I make educated decisions on the safe conduct of a flight if crew members are having arbitrary, unofficial report times imposed without my knowledge?

CAP 371 defines 'Reporting Time' as 'The time at which a crew member is required to report for any task associated with the business of the company'

This report has been referred to CAA (SRG)

FLIGHT CREW COMMENTS

DESCENDING ON THE GLIDESLOPE (FB65)

This is a comment to two items in the Jan 2003 FEEDBACK Issue 65.

Reading the first report "ATC under pressure", seeing the phrase - "...unable to tell the controller that we were LOC (Localiser) established because of RT overload and then- eventually got clearance for ILS approach and had to use Vertical Speed mode down to intercept the glideslope" - I thought to myself, yes, know the feeling, but why did the crew put themselves under pressure, by not normally descending with the glideslope when they reached it, rather than flying level, just because ATC had not cleared them for this specific part of the approach, which they seem to want to in the UK due to some outdated pedantic procedure. After all the purpose of intercepting the LOC is to go down the glideslope, not to continue flying straight and level! If ATC didn't want you to follow the glideslope, they should tell you to go around.

After all, we follow the rest of the STAR Approach without waiting for ATC instructions each time there is a change in direction. If you have been vectored, then given a direct to XXX, then when you reach XXX you don't continue on heading, you continue with the STAR or flight plan, unless told otherwise. Similarly you are vectored to intercept the LOC, thus once on the LOC you should follow the glide unless told otherwise.

Then I read the second report, "ATC workload/RTF phraseology" which was exactly echoing my thoughts!

But the reply was unbelievable!

The rational being that there are routes under the ILS, so aircraft must maintain a specific altitude for traffic separation Yes I agree we must not fly into traffic below the ILS, but this has absolutely nothing to do with the

phraseology used!!! If I am cleared to the LOC then only cleared to descend on the ILS once I am LOC established, how will my flight path be different, from if I am cleared for the ILS. We have still been given an altitude to descend to, we are still not allowed to descend on the ILS before capturing the LOC, so we fly exactly the same flightpath, whichever type of clearance. The only difference the change would make is to remove two redundant ATC calls. The initial ATC clearance could even be, "Clear to intercept the LOC and then descend on the ILS", which makes it clear that the aircraft can't descend before intercepting the ILS and still removes two redundant calls.

I don't know if, some time in the long and distant past, it was the norm that once cleared for the ILS, aircraft would descend to the platform altitude asap and fly level for miles before descending with the glide and this is what ATC are trying to prevent. But in those days maybe aircraft weren't given intermediate levels to descend to by ATC either. In the modern world we are all given an altitude to descend to, vectored to the ILS and then descend on the glide. So please let's get the phraseology to catch up and move into the 21st century!

The views expressed in this and other reports have been debated by the CHIRP Advisory Board. As a result of these discussions NATS agreed to consider this matter again, and have responded as follows:

The Manual of Air Traffic Services (MATS) Part 1 procedure for ILS approach, and phraseology for ILS approach, require the aircraft to be vectored onto the localiser and once established, descended.

The only exception is when ATC anticipate that a pilot will intercept the glidepath before being able to report established on the localiser. A conditional clearance to descend on the glidepath can then be issued but the controller becomes responsible for monitoring the aircraft Mode C until established.

If the conditional clearance is used the phraseology "ABC 123 Turn left heading 120 degrees, report established on the localiser 09L, when established on the localiser, descend on the ILS, QNH 1003 Millibars". A very long winded and difficult statement to include in one transmission especially when read back and at a time when R/T is to be kept to a minimum to ensure maximum runway utilization, and when pilots are at a busy period of the flight.

There have in the past been a few incidents where aircraft have descended to a final approach point before intercepting the ILS localiser which is potentially very dangerous in the proximity of London City, the edges of controlled airspace and helicopter routes.

At a capacity constrained airport where aircraft are vectored for the ILS from both sides at the same time, the above procedures allow the controllers to continue to use vertical separation until lateral separation exists.

NATS controllers are taught that standard practice is to establish on the localiser and capture the glideslope from below.

MORE ON EXCESSIVE RATES OF CLIMB

Can I add my comments to the 'Excessive Rates of Climb' (FB64) issues addressed by the B757 pilot in Issue 66? Like that pilot, I am concerned that the MEL can create more problems than it solves.

Recently, I had to position an empty A330 from AAA to BBB with just 10 tons of fuel on board. The take-off weight was in the order of 131 tons with a max TOW of 233 tons. Unfortunately, a thrust reverser was locked out. The Authority views this as a stopping problem so mandates a TOGA take-off based on the manufacturers recommendations. I did consider discussing a reduced power take-off with the experienced Captain I was flying with. The Tech Log showed I was not alone in this thinking. Most pilots positioning the aircraft were noting flex power for take-off and given the experience on the fleet I doubt that this was an oversight by those concerned.

Anyway, the resulting full-power take-off bordered on uncontrollable. An engine failure at 30-40 knots would have had us on the grass. The speed trend arrow was through the 'barbers pole' at 20 deg nose up so at around 200' agl I called 'non standard climb power', throttled back and dropped the nose. The RHS Captain said nothing.

As your correspondent says "a full power take-off ... at ultra low weight is high workload and a recipe for disaster". I agree absolutely. I accept that the MEL has to be black and white but surely the CAA (SRG) can come up with a form of words that states that at ultra low weights it is at least down to the Captain's discretion what power is used for take-off?

In relation to the report published in FB 66, CAA (SRG) discussed the reported concerns with the Manufacturer. In response, the manufacturer has agreed to an alleviation to the B757 MMEL thrust rating condition for despatch with an anti-ice valve locked open. This will be promulgated in due course.

This report has also been passed to CAA (SRG).

RTF LANGUAGE - A DIFFERENT PERSPECTIVE

Having read with interest the comments of the reporter in Issue 66 "Separated by language", I'd like to add a slightly different view to this age-old debate.

I am a French national and have spent most of my career based in the UK, flying for UK carriers to Europe, Mediterranean and long-haul destinations. I do agree

that in an ideal world everyone involved in aviation should be fluent in English, just as I agree that the wind should always blow straight down a runway at five knots, instead of straight across at twenty-five...

Most professional pilots outside the English-speaking world have to pass a stringent RT exam to prove their knowledge of aeronautical English is up to scratch, before they're legally entitled to take an aircraft outside their home airspace. It might therefore be a good idea to force big carriers in France, Spain, Italy, to use English for their RT. However, speaking as a pilot whose mother language is not English, I have found that it's sometimes more difficult to understand some of my own countrymen speaking English than an English or American voice. Combine that with confusing RT at a busy holiday destination and you have more potential for misunderstandings and danger than in the current status-quo.

Another point I'd like to make (that a lot of the advocates of a common aeronautical language perhaps don't realise) is that in a lot of European countries much of controlled airspace is open to PPL-holders without an IR. There is no requirement in many of these countries for pilots flying within National airspace to have any proficiency in English. Consequently, their knowledge of English can be non-existent. Forcing these people to use English could lead to catastrophic misunderstandings.

My suggested solution is simple: Use your ears, and experience. Over the years I've learnt to recognise the Spanish word for "Flight Level" and "Heading", and the rest is just numerals and pretty standard. It's certainly helped me with situational awareness.

OK, maybe it's easier for me because I grew up speaking a Latin-based language, but most pilots are sharp and adaptable by nature, so should try to make the effort.

CABIN CREW REPORTS

Cabin Crew Reports received in Period: 19

DISCRETION

I was rostered to report for an early morning departure for a multi-sector duty. Prior to leaving home, the check in time was delayed by more than one hour. On checking in, there was a further technical delay.

The cabin crew discussed the effect of the delays on our hours and I informed the Captain of our concerns; informed by Captain that hours were not a problem for another two hours.

Two hours later, the passengers were boarding; one of the flight crew told a cabin crewmember in the forward galley that we were in Discretion by five minutes.

We subsequently departed and completed the sequence. On landing back at base, I checked the Voyage Report as felt I needed to clarify our hours. The Discretion Box was ticked to say that the crew were informed of Discretion by Captain and discussed. As the Captain had gone home, I queried this with the First Officer as the In Charge or several other crew members had not been informed. He said he too was annoyed as he was not consulted either.

My understanding is that Discretion cannot be entered into ex-UK is this correct?

It is apparent from the number of cabin crew reports on this topic that a significant number of cabin crew members are unclear as to how and when Discretion may be exercised. Moreover, a frequent complaint is that they are not advised that Discretion has been exercised on their behalf.

CAP371 requires that a Commander "take note of the circumstances of other members of the crew" prior to extending a Flight Duty Period. Whilst there is no requirement for a face-to-face discussion with other members of the crew, and it is sometimes the case that a Commander will be required to make a decision without access to other crewmembers, good CRM principles would require that, subsequent to the decision being made, all other crew members be made aware of the Commander's decision.

As regards the reporter's final query, CAP 371 permits up to two hours discretion prior to the first or subsequent sectors in an FDP involving two or more sectors.

RELEASE OF CABIN CREW

I am very confused as to when I can leave my seat on ascent when the seat belt sign is on. Being a private pilot myself I am very aware of the weather at low altitude. Cabin crew leave their seats at different times, ie as soon as the aircraft has left the ground, after the undercarriage has been retracted (in my case when I feel the Captain thinks it's safe and switches the seat belt sign off). If I left my seat with the seat belt sign on would I be covered legally? Nearly every flight cabin crew leave their seat early, the aircraft is full of trolleys all set-up with the seat belt sign still on. This cannot be safe.

When crew leave their seats passengers also leave theirs because they think it is OK as the crew are moving around. Crew should set an example and stay in their seats until the Captain thinks it safe as his judgement must be safer than mine.

Crew have no idea about the weather outside the aircraft.

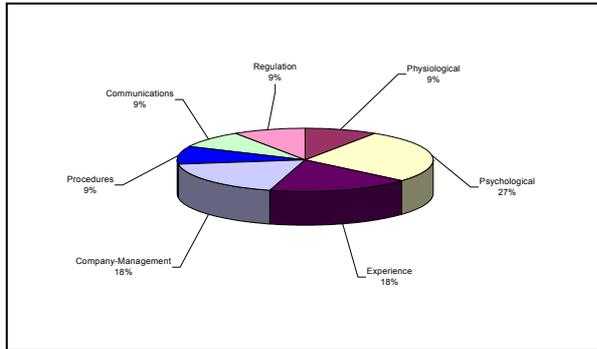
Most UK operators operate a positive release SOP whereby the flight crew notify/signal the cabin crew that it is safe for them to leave their seats and commence their cabin duties.

However, at least one operator permits crew members to leave their seats when airborne, once clear of low level turbulence, unless positively instructed by the flight deck to remain seated. This procedure places the responsibility on the flight deck crew to warn the cabin crew to remain seated, on occasions when turbulence might be anticipated, at a time when the flight deck workload can be quite high and thus this would not appear to be a failsafe procedure against possible injury to cabin crewmembers.

ENGINEERING REPORTS

Engineering Reports received in Period: 7

Key Areas:



MCD POLICY - MORE CHANGES DOUBTS?

(1)

A new policy at ### has just been introduced that allows Magnetic Chip Detectors (MCDs) to be changed on both engines at the same time, when previously one flight cycle was the normal interval on a twin-engined aircraft. After one full flight cycle the engine will have performed a hi-power take off which is the ultimate test for engine reliability. Murphy's Law being what it is it seems obviously only a matter of time before an accident involving both engines at take-off occurs. When it is easily avoidable by separating the items (left and right engines) by one flight cycle, as has been proven practice for many years.

(2)

The MCD removal/fitment procedure has been amended on our four engined wide-bodied aircraft to take account of the provisions of AWN 72 and Company Instructions. Subsequently considerable differences of opinion, and downright confusion has occurred amongst

LAE's and management as to how this task should be accomplished and certified.

1. The weekly check certification requires a VERIFICATION CHECK to be actioned and certified. The MM does not define a verification check.
2. Company Manual for non-critical MCDs states that certification is by "SEPARATE LMA HOLDERS with SEPARATE VERIFICATION CHECKS" yet a Note to this procedure states that personnel replacing MCDs on one (pair of) engines can do the verification checks on the opposite pair of engines!

This means that a person actioning and/or certifying one pair of MCD fitments then gets involved in fitting and/or certifying the other pair of MCD fitments!

It would appear that the Note is causing much confusion and difference of opinion as to how the weekly check (MCD Replacement) should be actioned and certified.

The reporters' concerns were represented to the maintenance organisation concerned.

The Company has categorised engines as 'critical' and 'non-critical' depending on whether there is a secondary oil way safety device in place to prevent oil loss, e.g. a non-return valve, fitted at the MCD locations.

'Critical' engines continue to have duplicate inspections and changes are staggered, i.e. there is at least one sector flown before the other engines have their MCDs changed, or an engine leak check run is carried out on all engines in addition to the duplicate inspection.

The procedure described in the reports applies to only non-critical engines and has been validated by a risk analysis that shows that the likelihood of an incident involving oil loss on one or more engines, using this procedure, is classified as remote. The check sheets state if the engines are 'non-critical' with reference to MCD changes.

In response to the concerns expressed, the Company has agreed to clarify the meaning of 'verification check', which being a company-driven requirement, would not be referenced in the Maintenance Manual.

FIT FOR FLIGHT?

On this particular shift, morale has been disrupted. The reasons for this are the questionable work practices and the technical knowledge of some of the members of the shift, which is of a much lower standard than the other members.

The problem is a stubbornness and unwillingness to accept help or assistance, preferring to carry on sometimes in very erratic ways. In fact, some of us with

similar time and experience on the ### (aircraft type) have had problems and have even refused to sign work that has been carried out. One person now has full CRS Approval and refuses to accept any advice from others with experience and JAR-66 licences but currently with a lesser Company Approval.

The main point of this report is to question the comment a senior manager made when he said that engineers had no right to tell the Approved person when he was doing something wrong.

Recently, an aircraft arrived with a defect outside the MEL limitations. The Approved engineer told the Captain that the fault was clear, and he accepted the aircraft. Another engineer argued that the aircraft was not fit for flight but was ignored. The aircraft departed.

On the next sector, the fault came back, and the aircraft spent several days AOG.

The engineer was told to shut up due to not having an Approval. He was told that if he wanted everything done right, he was in the wrong job. This did not inspire anyone with confidence.

In a climate where Human Factors is being highlighted, someone who has been trying to maintain professional standards has been labelled as a complainer and has been offered very little support.

The concerns of the reporter and his colleagues were brought to the attention of the senior Quality Manager, as a result of which appropriate action has now been taken to monitor individual work standards more regularly and to audit maintenance procedures more rigorously.

There is a natural expectation that a licence holder with full authorisation is at the top of the chain of certification. A number of incidents have occurred because such individuals have deviated from established procedures and taken it upon themselves that they know best. A licence reflects a point in time assessment. It marks an individual's basic capabilities but does not indicate that that individual has performed or been involved in every task. With time, additional experience of tasks not previously done and the application of knowledge through defect diagnosis will increase that individual's overall competence. It is unlikely however that there will ever be a point at which the individual stops learning. It should be remembered that an unlicensed mechanic with 20 years experience on a particular type will often have something to contribute and such opinions or views should not be too readily dismissed by the licence holder.

There should be no place for arrogance.

CELLPHONES - MORE THAN ANNOYING

I was a passenger on a recent flight to AAA (a non-UK destination). Cabin crew announced on the PA after boarding that the aircraft was in the process of being re-fuelled and that all mobile phones should be switched off until further notice.

Several Nationals of the country we were travelling to ignored this command. I personally asked the two persons close to me to observe the order to switch off the phones, which they did. However, there were others in the aircraft continuing to make calls, despite a second PA call to switch off phones. The cabin crew are very busy at this time with passengers boarding and cannot be everywhere watching passengers.

I am a regular traveller to and from this country and the problems of mobile phones are persistent on these flights and not only restricted to one operator. I have lost count of the number of times I have asked people to switch off their phones, whilst taxiing for take-off, taxiing after landing and once even on approach. All offenders are of the same nationality who fail to understand the consequences of their actions and the danger they put others in. I can't help feeling that sooner or later there will be a serious incident because of mobile phones on these flights.

When reported to the particular operator, they advised they would increase their announcements to travellers prior to boarding, but admitted it was likely to remain a problem.

The CAA has recently issued a FODCOM (17/2003) on the research they have sponsored into the effect of cell phones on vulnerable avionic equipment. This confirms the adverse effect transmissions from such units can have on avionic systems. The full results of the research can be found on the website www.caa.co.uk/docs/33/CAPAP2003_03.PDF.

GROUND OPERATIONS REPORTS

The following two reports relate to Ground Operations rather than Engineering, and were submitted from within a UK company contracted to a non-UK operator. They are of interest both from a security and an aircraft loading point of view.

OFF THE RECORD

(1)

When despatching a ### flight today from AAA (a UK airport), I was instructed by both the Captain and airline representatives, to allow 6 crew to travel on jump-seats,

but only to show 4 on the loadsheet, as they only physically had 4 seats available for use.

I refused to do either, stating the obvious safety and legal implications, at which point the Captain made the adjustments himself, and the flight departed.

My Company's local management have been informed, but I know no action will be taken, hence my communication.

(2)

I am writing with reference to Flight ###, and am very concerned at the approach taken by members of the ## (airline) supervisory team.

The flight closed with 142 adults & 4 children. When combined with the other payload this produced an under-load of 223kg. Two jump-seat passengers were given authority to travel, and there were 4 pieces of baggage missing, which produced a revised under-load of 107kg.

However, the ##(airline) supervisors at the gate were trying to get more staff away on jump-seats, but my load controllers advised them this wasn't going to be possible due to the limited amount of under-load. Upon presenting the load sheet to the flight crew, the Captain made an LMC change to offload 1 jump-seat passenger, however, upon leaving the flight deck, the Load Controller observed an additional 1 adult and 2 children boarding the flight, over and above the previous figures.

This produced a total on board of 142 adults and 4 children, plus 3 adult and 2 children jump-seats, which produced a total payload of 14863kg, which meant the aircraft was overweight by 60kg. In order to rectify the situation, the ##(airline) Ops Supervisor altered the pax breakdown to reduce the number of adults from 142 to 140, and to increase the children from 4 to 6. They also showed 3 children as seats occupied double, a practice I thought ##(airline) no longer adopted, especially considering the JAR Ops regulations.

To make matters worse, the Load Controllers were still relatively 'fresh' to the role, and not sure how to deal with the situation, a problem made worse by being told by the ##(airline) Supervisor not to mention this flight to me. The Load Controllers in question are now extremely anxious and upset over the entire incident, especially considering the importance I place on my training courses of producing an accurate load sheet.

Having asked other members of my team, it appears that 'changing' figures is a relatively common practice, and one which I am not at all happy with. I appreciate that on this occasion the aircraft was overweight by only 60kg, but an overweight aircraft is still overweight, and

surely the correct procedures should be followed to rectify the situation.

These reports were forwarded to the Department for Transport and CAA (SRG). Subsequent checks by CAA (SRG) failed to identify any discrepancies similar to those reported.

FMC - FIRST, MAKE COMPARISONS

This article was published in the NASA ASRS CALLBACK newsletter February 2003 Issue:

This B737-800 crew detailed the consequences of failing to compare the flight plan route with the FMC Legs Page(s) data. Their experience was typical of many incidents reported to ASRS in which fixes were either not entered, or were "dropped" by the Computer.

[We] departed XXX on the RNAV Departure. After flying over INTXN-1, we started to fly directly to INTXN-3. We failed to fly over INTXN-2, or the ABC VOR. It wasn't until Center informed us, that we realized we were off course ... and it took us a couple of minutes to figure out what had happened.

ATC vectored us back onto the departure and gave us a climb clearance. ATC also pointed out traffic, but we never saw it. We are not sure if our error caused, or would have caused, a conflict. The First Officer programmed the FMC. I checked the Route Page to see if it matched our clearance, and it did. It showed the correct departure and transition. I did not check the Legs Pages to see if all the fixes were there. I will next time! I do not know how the two fixes got dropped, but they did, and as a result we got off course ... We made an error programming the FMC, and then became complacent. We assumed that once we selected LNAV that the aircraft would fly the correct route. Unfortunately, the old saying applies, "Garbage in - garbage out". The airplane did exactly what we told it to do. After further reflection on this incident, it is my belief that while programming the FMC, a discontinuity appeared somewhere in the departure. When it was closed, some waypoints were dropped. This how we got off course ... I should have done a more complete check of the First Officer's programming.

CAA (SRG) ATS INFORMATION NOTICES (ATSINS)

The following CAA (SRG) ATS Standards Department ATSINS have been issued since April 2003:

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

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

Number 25

ATM related Material Published by Eurocontrol and Other Supranational Organisations

Number 26

Radar Control Service in Class D Airspace

Number 27

Cancelling Take-off Clearance

Number 28

Runway Incursion Awareness

Number 29

Training of Assessors and Verifiers

Number 30

Changes to the Operational Status of Radar Systems

Number 31

Assessment for Previous Competence (APC)

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

The following CAA (SRG) FODCOMS have been issued since April 2003:

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

Special Communication 1/2003

1. Alleviation for Flight Deck Doors and Interphone Systems

8/2003

1. Letter of Intent: Proposal to Amend The Air Navigation Order 2000 - Proposal to amend Schedule 5 for the purpose in introducing changes to operational equipment requirements for the carriage of a secondary surveillance radar equipment that includes a pressure-altitude reporting transponder on aircraft flying for the purpose of public transport.

9/2003

1. Accident Prevention and Flight Safety Programme
2. Operational Flight Data Monitoring
3. The Meaning of 'Radar Control' Within Class D Airspace (See Page 1 of this Issue)
4. Trash Compactor Boxes

10/2003

1. Life Jacket Demonstrations on Small Aircraft

11/2003

1. Aircraft Inbound to the UK with Fuel Reserves Approaching Minimum

12/2003

1. AIRPROX Report 105/02 - TCAS Incident - Level Bust

13/2003

1. Instrument Approach Procedures Designed to TERPS Criteria

14/2003

1. Second Letter of Consultation: Proposal to Amend The Air Navigation Order 2000 - Schedule 4 for the Purpose of Introducing Changes to Operational Equipment Requirements for the Carriage of a Means of Indicating Outside Air Temperature and for the Carriage of an Emergency Locator Transmitter.

15/2003

1. Letter of Consultation: Proposal to Amend The Air Navigation Order 2000 - Article 53, Article 129, Schedule 4 and Schedule 10 for the Purpose of Introducing Operational Equipment Requirements for the Carriage of a Vibration Health Monitoring System on Helicopters with a Maximum Approved Seating Configuration of More than Nine with a Certificate of Airworthiness in the Transport Category (Passenger), and to Provide for the Manner in which this Vibration Health Monitoring System is to be Used.

16/2003

1. Operational Considerations when the Accuracy or Reliability of Navigation Equipment is in Doubt During the Approach Phase.
2. Runway Incursion Awareness

Special Communication 2/2003

1. Alleviation for Flight Deck Doors and Interphone Systems - [cancelling Special Communication 1/2003.](#)

17/2003

1. Scalds to Passengers
2. Cellphone Interference of Vulnerable Avionic Equipment
3. Ice Falls from Aircraft
4. Mode A and C Transponder (SSR) Equipment

18/2003

1. Letter of Intent: Proposal to Amend the 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.

19/2003

1. Catering Trolleys
2. Photoluminescent Floor Proximity Emergency Escape Path Marking Systems
3. Water Contamination in Bladder Tanks
4. Flight Outside Controlled Airspace
5. Mode A and C Transponder (SSR) Equipment - Corrigendum