

FEEDBACK

Issue No: 69

Winter 2003/4

EDITORIAL

During the past year, we have received a total of 374 Aviation reports, of which 151 were submitted by professional flight crew members.

By comparison in the same period, we have received fewer reports from ATCOs (19) and Engineers (24). This perhaps reflects the success of internal company reporting initiatives over the past two years or so and in the case of Engineers, the development of Company Maintenance Error Management Systems for the reporting and investigation of maintenance-related Human Factors incidents. The Cabin Crew Programme, now incorporated, received 60 reports.

What do we do with the reports we receive? With the reporters' consent, 78 reports have been represented to the relevant management in a manner that protects the identity of the reporter. A further 103 reports have been represented to the relevant department of CAA (SRG) for information and follow-up as necessary.

The Advisory Boards assist in this process by reviewing issues raised in reports, after these have been appropriately disidentified, and advising on the most appropriate action to be taken. In the past year, the Air Transport and Cabin Crew Boards have reviewed 121 reports.

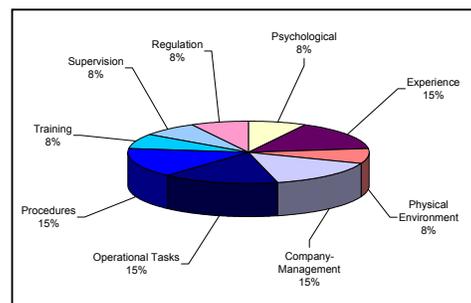
This Programme operates in an industry that has well-developed formal safety reporting processes, and is a complementary process to these. What do we offer?

- The opportunity to discuss a safety-related concern and if appropriate for that concern to be represented to the appropriate agency.
- The ability to share an error or an experience for the benefit of others.
- A method of reporting safety-related information that would not otherwise be captured by other reporting processes or, having been reported through another process, has not been acted upon.

ATC REPORTS

ATC Reports received in Period: 3

Key Areas:



TAKE-OFF MINIMA - ATC

My airport operation has a 'quandary' and as usual, ATC are the piggy in the middle!

During low visibility procedures, the aerodrome authority has until now authorised departures in accordance with the AIP, which with High Intensity Runway Edge lights and/or centreline markings available permits an RVR of 250m (*Category A,B,C*) if the operator's Operations Manual permits. CAA (SRG) has now ruled that UK and non-UK operators must comply with CAP 168 (*Licensing of Aerodromes*) which says 400m RVR for our runway configuration in spite of what the operator's Operations Manual may permit.

This apparent anomaly has existed ever since the AIP was re-issued in about 1999; presumably the AIP was written in accordance with JAR Regulations. Why is it taking so long for CAA (SRG) to amend CAP 168 to comply with these regulations; surely all publications should work to the same basic guidance?

Meantime, ATC has to explain to a pilot why he cannot depart if the RVR is (say) 300m even when his own approved Operations Manual says he can.

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

*Discussions with CAA (SRG) Aerodrome Standards
Department revealed the following:*

*The limitation published in CAP 168 referenced in
this report reflects the ICAO Annex 14 Standards and*

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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
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 E-mail: fclweb@srg.caa.co.uk
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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.

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Recommended Practices; this requires white runway centre line lights for take off in RVR below 400m.

The Aerodrome Operating Minima published in the UK AIP, as stated in the report, are 250m for Cat A,B,C aircraft and 300m for Cat D; these are based on JAR-OPS.

The UK AIP entries for other UK airfields with a similar runway lighting configuration to that described in this report include a Runway Departure Restriction relating to the higher RVR minimum (400m), except in particular circumstances. The AIP entry for the airfield in this report does not; the CAA has advised the airfield of a suitable entry that reflects the current policy.

The difference between ICAO/JAR-OPS has been raised in the past, but regrettably, as yet, remains unresolved. The CAA has been requested to consider a further initiative to harmonise the different standards.

FREQUENCY CONFUSION

Although most of the reports we receive are from flight crew, ATCOs or engineers, we also receive reports from other people with an interest in safety, such as the following:

Please forgive me for troubling you, however, I have come across something that has the potential to be a safety issue. I decided to alert you to it and leave it for you to find out if anything needs or can be done.

I listen to aircraft that cross the airspace roughly bordered by DCS, POL to the North and BPK in the South.

Generally speaking, aircraft southbound from Scotland, above FL270, routing DCS-MCT, are handed off to 129.2 or 131.125. Flights travelling northbound are handed off to 129.225 (Scottish). Therein lies the problem.

Of late I have noticed that both aircraft and ATC have made errors in hearing or giving either 129.2 or 129.22(5). The latter is always given as 129.22. You may see the potential for what happens from this yourself already. Sometimes aircraft go to 129.2, when they should be on 129.22, and vice versa. Aircraft are then not on the frequency they should be. They report on the frequency and the ATC will not be expecting them. I dare say they are used to the problem so just tell them to go back to previous frequency or give them the proper frequency they should be on. All of this takes time, of course, and attention is directed away from the tasks at hand. I have known aircraft not to call up on the new frequency immediately and so they may be off direct ATC for up to 5 minutes (in very busy airspace). It also means that other traffic's calls are delayed while it is

sorted out. The confusion rises from the use of 129.2 and 129.22(5) being hand-off frequencies on the same ATC suite. Unfortunately both frequencies are heading in opposite directions and on different sectors (London ATC and Scottish ATC). It could all be avoided if either 129.2 or 129.225 was changed to a very different sounding frequency.

The reporter's concern was discussed with the ATS Provider. The information reinforced other similar comments. Subsequent internal enquires with the Units involved confirmed that problems with frequency confusion had been experienced. We were advised that the following actions were being taken:

Controllers were being reminded of the importance of both issuing frequencies carefully and listening to readbacks.

As there were no new or spare frequencies available at the Unit, it was planned to swap two current frequencies as soon as practicable to remove the confusion.

Longer term it is hoped that new frequencies will be available towards the end of 2004.

FLIGHT CREW REPORTS

Flight Crew Reports received in Period: 41

Key Areas:

FREQUENCY CONGESTION

I have been flying across the London TMA for the past ten years or more. Last summer frequency congestion reached breaking point. Time and time again it was not possible to check in on a frequency.

In mid-July, we were transferred to frequency 1##.##. I waited 3 minutes 45 seconds trying to make contact with London Control. I never pressed the transmit button. I could not get a word in at any time. There were numerous double transmissions and even one period when three transmissions were being made simultaneously. In the end London Control contacted us.

On numerous occasions both before and after this occurrence I had to wait over 2 minutes.

NATS advise that the Terminal Control sector referenced in this report is known to be one of the busiest sector in the TMA; action is in hand to address this matter later this year.

One of the contributory factors to RTF congestion is the need for additional calls to be made, as a result of poor RTF standards. Ensuring that RTF messages/responses are correct, both in phraseology and content will assist greatly.

WET RUNWAY REPORTING

Am I the only pilot exasperated by the persistent misreporting of runway states by many of the Airports in the UK? All too often "Wet, Wet, Wet" on the ATIS means "Damp, Damp, Damp" or even "Dry, Dry, Dry". ### (A UK Regional Airport) was notorious for this - an airfield on top of a hill with a grooved runway that could only ever be "Damp" or "Flooded" - reporting "Wet" whenever a cloud was visible in the sky. Following, I believe, the intervention of the local CAA Inspector ### has now become a model of accurate reporting. One down, dozens to go.

Charitably, the use of "Wet" as the, almost, default runway state whenever moisture is present may stem from the desire of ATC Ops Assistants to "err on the safe side". Sadly, a pessimistic report does not "err on the safe side" at all; it simply commits the pilots to the wrong course of action in the event of an engine-failure at a critical point in the Take-off roll by inflicting upon us a lower Take-off Decision Speed [V1 (wet)] instead of a V1 (dry). Of course it may be that ATC Ops Assistants are simply covering themselves at the pilots' expense. This is unacceptable - I should not have to disregard a palpably inaccurate runway surface report, and override the F/O's objections, simply to maximise my own chances of being alive to face the Board of Enquiry in the event of an engine failure between V 1 (wet) and V 1 (dry).

Over-estimating the amount of standing water on a runway causes three problems:

1. It needlessly limits T/O weight.
2. It causes the wrong (ie. less-safe) Decision-Speed to be chosen.
3. It causes un-necessary CRM problems in the cockpit.

Will all SATCO's please insist on accurate runway surface reporting at their Airfields. "Wet" does not mean "spray thrown up by Landrover wheels"; it means 25% coverage of standing water with a clear reflective surface and a depth not-exceeding 3 mm. At the moment I honestly doubt if 10% of the "Wet" runways I operate from are actually "Wet" rather than "Damp".

At all major UK airfields, the responsibility for assessing runway surface condition is that of the Airfield Operator not the ATS provider. The information is provided to ATC, who pass it on to aircraft.

The CAA introduced an expanded runway surface condition reporting scheme in July 1999 (Notice to Aerodrome Licence Holders No. 3/99 refers).

The scheme defines a runway as 'DAMP' if the surface shows a change of colour. However, if there is sufficient moisture to provide a surface film or the runway appears reflective, the runway will be reported as 'wet'.

The definition of 'WET' is not exactly as stated in the report. The scheme defines a runway as 'WET' if the surface is soaked but no significant patches of standing water are visible. The runway will continue to be reported as 'WET' if patches of standing water (water deeper than 3mm) are present on up to 25% of the assessed area.

When more than 25% of the assessed area is covered by patches of standing water, the runway will be reported as 'WATER PATCHES' and when more than 50% of the assessed area is covered by standing water, the runway will be reported as 'FLOODED'

If you consider the reporting of runway surface condition not to be accurate, submit an MOR.

In response to a number of confidential reports and other information detailing similar communications difficulties in the Northern North Sea, the CAA put in place a safety initiative, in conjunction with NATS and offshore operators, to establish additional re-broadcasting transmitters so as to provide complete RTF cover at 1,000ft in the relevant areas. These improvements have been agreed and are being introduced.

The reporter's concerns regarding the Southern North Sea have been represented to CAA (SRG) to permit them to be followed up.

RIGHT, LEFT OR RIGHT AGAIN!

The weather at AAA (Southern European Major Airport) was marginal Category I with RVRs of >1500m but an overcast cloud base of 200ft. Initially, we assumed that LVPs (Low Visibility Procedures) would be in force and planned for the published, preferential runway of ##R.

The ATIS is received quite late into AAA because of the nearby mountains but, when it was, it made no mention of the LVPs and reported that ##L was in use for arrivals. We reprogrammed the FMGC and re-briefed for the new approach noting that the two runways have significantly different go-around procedures.

However, upon contact with the approach controllers we were told to expect ##R and that LVPs were not in force. This then required further re-programming and re-briefing at what was becoming a fairly late stage of the descent. We were then offered the usual AAA tight vectors with a tailwind which we declined and took extra track miles. Whilst the visibility was moderate below the cloud, we attained visual reference at approximately 20ft above MDH (Minimum Descent Height) and elected to continue with a Cat I autoland. We both felt that LVPs should have been in force.

After landing, we were then given complex taxi instructions, at speed, which included crossing the active departure runway in moderate visibility. We insisted upon a slower and clearer set of instructions.

My reason for writing this report is that the events described above happened to me almost identically a few weeks before, albeit in better weather. Furthermore, on that occasion, when we departed we were given three departure runway changes. Similarly to the arrival scenario, the departures are very different (ie turn in different directions) and have very different emergency turn procedures (which also turn in different directions). For that departure we were eventually given ##R with a SID (Standard Instrument Departure) which turns to the right but once under radar, we were offered a more expeditious left turn by the controller! We declined this because we had no visual contact with the terrain,

DEGRADATION OF RADIO STANDARDS - SOUTHERN NORTH SEA

(A company managing offshore facilities) is implementing a policy to reduce offshore radio operators on manned platforms in Southern North Sea. Platform AAA now has no radio operator and the flight watch responsibilities are held at the moment by Platform BBB when in range, then onto standby vessels (various).

On numerous occasions on this flight standard calls by our aircraft went unanswered by the watch holder.

I believe this is a safety issue as the holding of the flight watch is a very important job. When out of communications with ### Radar, this is our safety net and a downgrade such as this is a move in the wrong direction as regards safety. Problems such as obtaining onshore weather reports when on a fuel stop with no radio operator will also add to the problems in the future I'm sure.

This caused excessive fatigue and was a distraction throughout the flight particularly throughout the landing and takeoff phase.

because of the usual murk in the adjacent valley, and felt our escape strategy in the event of an engine failure would be unclear. We flew the SID as cleared.

In conclusion, we felt it was inappropriate to have multiple runway changes at an airfield with significantly different SIDs/ETPs and GA procedures especially when you are descending over mountainous terrain or about to depart over it. The potential for loss of situational awareness resulting in landing on the wrong runway or turning towards danger is great. A crew with less experience of this ATC unit or less diligence could well become disorientated. Add to this the marginal weather and you wonder whether anything was learned from the accident at Linate.

PROCEDURAL CLEARANCE - BEWARE

After take-off we were procedurally cleared to climb FL200 by AAA (West Africa) ATC westbound on Airway A###. Inbound, and opposing us, to the AAA FIR was ABC123 (Non-UK operator) who was cleared descent FL210. The AAA controller was attempting to provide separation bearing/DME reports from the AAA VOR/DME. Moments after levelling at FL200 we saw the ABC123 pass some 500ft directly underneath!! On querying his level with ATC he "confirmed" his level as FL210. He clearly was not!

I have long since considered ATC in that part of the world to be perhaps the most dubious in the world but to have pilots display no spatial awareness and abuse their legitimate instructions just compounds an already unacceptable risk.

REPORT TIMES - LEGAL OR PROFESSIONAL?

Our airline is low cost, high utilisation. Duty hours are high and flights into discretion are often the norm. A newsletter has been sent to all flight deck crew from a Flight Operations Manager. The Manager is advocating reporting for duty at an earlier time than is rostered in order to improve our on-time departure performance. The newsletter states in relation to our company report time "One hour before (Scheduled Departure) is only a legal limit, not a professional limit". By inference this means that to be 'professional' we should ignore the legal report time. Flight time limitations are based upon the rostered Report time and number of sectors.

The newsletter concludes with the statement "Please don't be a burden to your fellow crew members by sliding in at STD - 1 Hr". To suggest that we are burdening fellow crew members by "sliding" in at STD - 1hr is putting undue stress on crews. I feel pressurised into reporting earlier than required, which will mean less rest taken. Considering our company rosters minimum

rest on a frequent basis, being psychologically forced to report earlier than required, with the consequences of FTL's being exceeded is wholly unacceptable.

If the Manager (and the Company) require more pre-flight preparation, then earlier report times should be ROSTERED with FTL's based on the actual report time. This would be a legal and professional solution. Alternatively we could note our actual report time on the voyage report and base FTL's on that. Unfortunately the company programme could however not be achieved.

This matter was brought to the attention of CAA (SRG). Subsequently, following enquiries by the CAA, the Company Notice was withdrawn.

It should be remembered that report times are based on the average time needed to complete the necessary pre-flight duties and, on particular occasions, it might be preferable to report a little earlier than the scheduled report time to avoid rushing. However, where the required duties cannot be routinely completed within the time available, the scheduled report time should be adjusted accordingly.

ANOTHER VIEW ON FTLs

Fatigue is an insidious problem; I am aware of it and do my best to avoid it. However it doesn't always work. I work for XXX, a UK subsidiary owned by a European parent and operated under a non-UK AOC/FTL scheme. I had serious lapses of concentration on two sectors recently routing Europe - UK - Europe. On the first sector, I was Non-flying Pilot. Approaching AAA I was given a frequency change that I correctly replied to. I then mis-set the frequency and forgot to check in with the result that we flew for approximately 100 nm with no radio communications.

On the return flight I was Pilot Flying and was given a Heading to fly. This I did. We were then given direct to ABCDE. I entered it into the FMS but forgot to engage NAV mode to take us there with the result we stayed on Heading, flying south out of controlled airspace. The controller soon spotted it but was justifiably annoyed. In both instances the only injury was to my professional pride.

These two flights were off an early report 0530 UK local and I was to position home after 3 nights away. Prior to this block I had worked 6 days in BBB (Europe); 3 days flying followed by 2 days in the simulator and a further early to UK and back, then position back to home in the UK for 2 days off. Our FTLs allow for very great latitude in the concept of split duties. For example my first day of duty was Check-in at 0930 position to BBB, Operate three sectors, end in CCC at 2015, night-stop, report 0505, operate to BBB, off duty 0800. Thus I was planned 10 hrs 45 min duty with 8 hrs 50 mins rest.

Duty days have a planned maximum of 13 hours with weighting for the time of day. We frequently operate up to 13 hours and under the rules can extend to 16 hours. A reduction for the number of sectors only occurs from the fourth sector. Different beds, different sleep patterns, poor diet, then when home having to cram into two days everything that family life would spread over the week. It's my license and my future and in it I shall have to learn to say "NO I'm fatigued".

AIR/GROUND SERVICE - A REMINDER

At my home base of AAA, I am noticing more and more incidents of traffic at the hold "requesting backtrack" and on being told "nothing known" proceeding to backtrack without obviously looking or listening. It's not just private pilots visiting or AAA-based. We have several corporate jet operators visiting with increasing frequency who think AAA is much bigger ATC-wise than the Air/Ground (A/G) service that is available.

Increasingly pilots on final have to go around or the traffic on the runway makes a hurried departure. As an instructor I actually welcome the real situation go around for the student but worry about the possible consequences.

Some of the perpetrators come from airfields with a full ATC service and are obviously not taught or have forgotten that they are responsible for their actions and not to shift this responsibility on to someone else.

The radio operator(s) at AAA and other places should not give instructions or misleading statements to pilots in order to be helpful and friendly and then say nothing when they are busy taking money for landing fees, fuel, answering phones etc.

A few years ago A/G operators were sent reminders of their R/T procedures. Perhaps it's time to send another one.

Do you operate into airfields served by an Aerodrome Flight Information Service or an Air/Ground Service? If you do, are you aware of the limitations of each service and the responsibilities placed on pilots when operating in these environments?

Full details can be found in CAP 413 – Radiotelephony Manual; this can be accessed on the CAA website.

FLIGHT CREW COMMENTS

STAND DESIGNATORS - A COMMENT

Your ATC correspondent's comments on the new system at LHR remind me of a visit (as an airline pilot) to ATC at a major Middle Eastern Airport. The SATCO

complained that the first he knew about changes within his parish was when he was informed from "above".

How odd that those who do the job have little or no say in how it should be done?

Prior to the introduction of the new designators at LHR, the Airport Authority set up a consultation process which included the ATC provider, several major local airlines and CAA (SRG) but, interestingly, not the principal UK pilot representative body.

Since the introduction of Phase One, the British Airline Pilots' Association has been included in subsequent discussions.

Hmm!

MORE ON CHAOS CORNER (FB 68)

I was on a flight heading east through Chaos Corner (North East Mediterranean). We received a TCAS Resolution Advisory 'Climb' during a descent from FL390 to FL370 when we met a company aircraft flying west at FL380.

Can I add my voice to the writer of the original article; it seems ridiculous to have the RVSM border here with so many conflicts and poor ATC. Every document that covers this area advises not to request level changes.

It seemed rather glib of you in your reply to ask us if we know the SOP when we receive a Resolution Advisory; we should not be relying on TCAS to this extent. Our Minimum Equipment List does not allow us to leave base with an unserviceable TCAS and route via Chaos Corner. However, it does allow us to RTB (Return to Base) with an unserviceable TCAS and route this way!

I now always fly 1nm right of track through Chaos Corner and wonder why we don't have this simple addition to safety as an SOP.

Indeed, why don't we fly 1nm right of track everywhere?

The reporter's point about the wisdom of operating in this area without the availability of TCAS merits consideration.

As regards the use of offset tracks, ICAO issued revised guidelines on the use of lateral offsets in May 2002. (State Letter AN 13/11.6-02/21 refers). The guidelines state that offsets must only be used when approved by the appropriate ATS Authority and only when in oceanic or remote airspace. Offsets must be made only to the right of the centreline relative to the direction of flight.

Offsets should not be applied in parallel route systems when the route spacing is less than 50nm. A study into

the use of offsets in this and other airspace by the ICAO Separation and Airspace Safety Panel is ongoing.

THUNDERSTORM AVOIDANCE - A COMMENT

Aircraft damaged by hail. Flying into a Cumulonimbus because that's the clearance! I have two observations.

1. "The Captain may, at his discretion etc.... "When things are that bad, REFUSE. It's not just a right, it's a duty.
2. ATC in many places (where Cbs are prevalent) simply don't know what they are doing in relation to thunderstorm avoidance.

ENGINEERING REPORTS

Engineering Reports received in Period: 6

Key Areas:

MANPOWER AND PLANNING

I started at 1800hrs for the first 12hr night shift. Due to courses, leave and sickness I was the only LAE on the ramp with full cover on the particular aircraft type. I was allocated one other licensed engineer, who was not fully qualified, and five technicians/mechanics, four of whom were 'A' licensed. The workload consisted of seven night stopping aircraft all with daily checks, plus five engine checks, seven ADD's plus inbound defects and defects arising from the daily checks. The engine checks require duplicate certification for correct engine cowling closure and another LAE was allocated for this when required. The workload was completed with all the team working through the night without stopping for a proper break until the end.

The second night was worse. Workload increased to eight aircraft with eight daily checks, two weekly checks, one 400-hour check, one 500-hour check, one burner pressure sensor check, seven ADD's plus inbound defects. Two aircraft required investigations and defect rectification arising from the inspections. Weekly checks also require cowling duplicate certification. The team was as the previous night plus four extra technicians/mechanics consisting of one 'A' licensed and three non-certifying.

This was an impossible workload, flooding the team with technicians/mechanics did not address the situation as

there was too much certification/supervisory work for one LAE. After two hours of shift had elapsed another licensed engineer was eventually allocated for the night and we split the aircraft and teams to a manageable level.

AWN 3 requires me to manage and control additional supporting staff and exercise an adequate degree of supervision. Given my own workload on both nights this was not possible. However, AWN 1.4 Note states:- "Within a CAA Approved Maintenance Organisation it is the responsibility of the Organisation to ensure the provision and management of the overall manpower resource is adequate".

Surely this is a conflict of interests as it is the management that has cut manning levels and stopped overtime leading to situations like this occurring. This is not an isolated incident and the company is increasingly relying on staff goodwill to maintain an operation but expecting it to be a one-sided agreement.

AWN 47 also states that it is the duty of management to minimise workplace stress. At what point does my psychological integrity become compromised by being put into unnecessary stressful avoidable situations, leading to a potentially serious situation whereby I cannot legally exercise my certification responsibilities?

The operator has in place appropriate manpower planning procedures to which it works. Such plans will normally take account of significant training programmes. This guarantees that the overall requirements of JAR-145 in respect of manpower resource against workload are met. Short term factors such as leave and illness, however, will often present problems such as those reported. While adequate technicians/mechanics may be available to do the physical work, as was the case here, it is necessary for the certifying engineers to have confidence and, where necessary, have adequately supervised the work carried out by unlicensed staff for which they sign.

Otherwise they have the right not to certify work completed until properly satisfied. However, current operational and commercial pressures in the industry cannot be ignored and these can, in turn, put engineers under pressure to produce serviceable aircraft, on time. LAEs and their managers need to be constantly alert to the possibilities of undue pressure/stress resulting in maintenance errors, particularly in times of local staff shortfalls for whatever reason.

TO CHECK OR NOT TO CHECK?

I am employed in a base maintenance environment by a foreign operator to oversee and certify checks on the Company's wide-bodied fleet. Part of my duty is to attend planning meetings to discuss the following days checks. At one such meeting the aircraft due to arrive

for a routine check had an outstanding maintenance ADD for hard landing checks to be carried out. The planner informed the engineers present (including myself) that the outstanding hard landing checks were not requested at the following days input. Immediately I responded that the aircraft could not require hard landing checks and remain in service. On contacting maintenance control (MC) they confirmed that the aircraft had an exceedance, hard landing, measured at just over the Maintenance Manual (MM) limit. It was confirmed the aircraft would still be flown to my station and we could do the checks there. I informed MC that if the aircraft flew to my station I would ground the aircraft until the checks were done. MC was under pressure to keep the aircraft in service and proclaimed he could not take the delay at home base as "heads would roll".

The aircraft then flew to my station where I and another engineer grounded the aircraft and carried out the relevant MM checks therefore legitimately deferring the planned maintenance to accommodate these checks. It transpired the aircraft had flown over six sectors since the hard landing was discovered via the Quick Access Recorder disc. There was no authorising paperwork for the aircraft to remain in service only a maintenance ADD - this is an electronic file so is therefore not available to flight crew to view before accepting the aircraft for service. I spoke to my local QA Manager who asked me to defer raising a Quality Report as he would try to get some answers from main base. These were not forthcoming so I raised a Quality Report. The Company responded by saying that as there was no pilot report for the hard landing maintenance control 'applied discretion' on when to carry out the relevant MM checks.

I raised the following points:

1. Although there was no report of a hard landing in the Tech Log it was ascertained later - via the disc - that a hard landing had indeed occurred. The checks should be carried out as soon as the exceedance was known and before further flight. If the checks could not be carried out then they could only be deferred by correct authorised documentation e.g. from the airframe manufacturer and not by MC 'applying discretion'
2. What was the limit of the Company's 'discretion'? Without correct authorisation this could lead to ever increasing amounts of discussion.
3. At one point the QA manager of the Company suggested that as the aircraft had had a few daily and weekly checks with 'no fault found' that this indicated that there was no problem. The checks required are very comprehensive and took over 12 men more than 10 hours to complete.
4. Why was no Authorisation to keep the aircraft flying sought from the manufacturer?

5. The maintenance ADD system is supposed to be used to follow up work requests for repetitive defects. In this instance it was used to hide an exceedance. There have been many other instances where this system is used to 'hide' defects which are outside the operating limits of the aircraft.
6. The Company now claims the aircraft flew outside of the 'strict technical limits' but was inside the 'operationally acceptable limit' I have asked the Company to show me the 'operational limit' without success.

In my past experience as soon as an exceedance on an aircraft is discovered the aircraft is grounded until the relevant MM checks are carried out or deferred by the correct authority. I do not believe that MC can 'apply discretion' without this authority.

As noted, this report involved a non-UK operator. The report was passed to CAA (SRG) with the consent of the reporter. After reviewing the report CAA (SRG) elected to forward the content of the report to the overseas authority concerned for their attention.

It should be noted that the requirements of any inspection or check apply unless the agreement of the manufacturer and/or the relevant airworthiness authority is obtained to vary the content or periodicity. Maintenance Control, technical services staff engineers or even quality staff are not empowered to take such action independently. Discovery of exceedances or incidents, which derive from any source should be acted upon.

GROUND OPS REPORTS

A LOADED REPORT?

On ### flight (a non-UK operator departing out of a UK airport) the load sheet and trim were completed by the airline station manager.

Now, when I say load sheet, it was simply a piece of paper taken from a document printer at the departure gate, with a few figures such as ZFW and TOW written in approximately the right place.

The trim chart mysteriously worked out to be balanced exactly in the middle of the trim range. Funny how that happens on every flight.

I don't know if this is something that certain other authorities might be interested in, but it is certainly causing a few of my colleagues early grey hairs!

This report was passed to the Department for Transport and the Civil Aviation Authority, following which a Ramp Inspection has been conducted.

REPORTING OF RAMP DAMAGE

Several years ago the AAIB investigated a serious incident involving a rapid decompression which resulted from unreported ramp damage prior to the flight. The follow-up enquiries revealed a blame culture within the ground handling agency management and disciplinary policies that obviated reporting of such incidents; these findings led to an initiative to reverse such policies.

However.....

The current suppliers of ground handling services at ### (a UK airport) operate an employment culture that ensures that their staff who damage aircraft are ultimately sacked. Two hits (sic) and you're out.

Thus, every effort is made by those individuals to conceal such damage, whether it's their first time or their second, with the greatest effort on the first; 'to keep one in the bank', and our aircraft fly away carrying that damage to far off lands.

For example, last year, G-XXXX started an engine following push-back without the parking break being set, moving forward against the tow-bar and colliding with the tug. Result - tug driver sacked.

Then last week we got G-YYYY all the way to Central America with a hole in it, following damage at ###, probably caused by the ground handling company.

Where do we go to resolve the attitude of the ground handling company?

Before we hurt some passengers

This specific case has been brought to the attention of the operator concerned and is being followed up. More generally, operators may wish to consider whether contractual assurances in respect of handling agents' reporting/disciplinary policies and their implementation might assist in preventing this type of incident.

The report has also been passed to the Health and Safety Executive, which oversees the safety of ground operations.

ENGINEERING COMMENTS

PINS & NEEDLE? - FB67

I have often resisted the temptation to comment on previous CHIRP reports, as I think CHIRP only needs to be a thought provoking concept to achieve its objective. However, I feel forced to respond to the flight crew report of the nose gear pin being left in, (Issue No: 67).

Latest theory says, I should not apportion blame but seek prevention. In which case, fitting all the pins, not just

the one hidden up in the nose gear bay, may well have highlighted the situation. Maybe the human factor here was laziness.

One barely needs to read between the lines however to see that although an engineer did the daily inspection, a 'ground crew man' did the departure. Whilst we all know that engineers can and will continue to miss undercarriage pins, an engineer on departure is more likely to have a personal procedure for preventing a pin being left in. This would have been the safety net a 'rushed' crew needed.

What if pilots were to ask their 'ground crew men' whether they know what the undercarriage pins are for? What do they know of human factors, chain of events, CRM, the dangers of 'norms'? Do their 'ground crew men' know the possible consequences of an incorrectly closed door, hatch or panel or a forward toilet service panel leaking? Pilots may be disappointed by some of the answers.

The pilot in the report has no reason 'not to feel proud' of that particular flight, he was let down. If however, he worked for that employer, when they switched from apprenticeship served, licensed (CHIRP reading) engineers for departures, to unskilled 'ground crew men' and said nothing, that was the day for which he should not feel proud.

It is worth noting that the original report concerned a scheduled Public Transport operation at a manned UK station. Corporate operators and Public Transport operations to more remote locations use the aircraft undercarriage pins for which the flight crews are responsible. In such cases previous remarks about making a Tech Log entry when pins are inserted are not relevant.

CAA (SRG) ATS INFORMATION NOTICES (ATSINS)

The following CAA (SRG) ATS Standards Department ATSINS have been issued since October 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 36 - Issued 11 November 2003

Implementation of the New Harmonised European ATC Licence

Number 37 - Issue 11 November 2003

Winter Operations at Aerodromes

Number 38 - Issued 27 November 2003

Implementation of the New Harmonised European ATC Licence

Number 39 - Issued 24 December 2003

The Operation of Laser Searchlights and Fireworks in the Vicinity of an Aerodrome

Number 40 - Issued 8 January 2004

Implementation of the Railways and Transport Safety Act 2003 - Aviation: Alcohol and Drugs

CAA (SRG) FLIGHT OPERATIONS DEPARTMENT COMMUNICATIONS (FODCOMS)

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

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

23/2003 - Issued 27 October 2003

1. Contaminated Runways Winter Operations
2. Ground De-icing/Anti-icing Holdover Times
3. De-icing/Anti-icing of Aircraft
4. Rehydration of Type II and Type IV De-icing/Anti-icing Fluid Residues
5. Recommended Documents of Winter Operations

24/2003 - Issued 27 October 2003

1. Oven Fires

25/2003 - Issued - 27 October 2003

1. Wearing of Survival Suits by Passengers and Crews on Helicopters Operating Over the Sea
2. Provision of Two Way Radio Communication During Underslung Load Operations
3. Radio Altimeter (Height Bug Setting Procedure)

26/2003 - Issued - 14 November 2003

1. European Aviation Safety Agency - Transition to European Commission Regulations Annex I - Part M

27/2003 - Issued 10 December 2003

1. ACAS - Action to be Taken Following a Resolution Advisory (RA) Warning

28/2003 - Issued 22 December 2003

1. Implementation of the Railways and Transport Safety Act 2003 - Aviation: Alcohol and Drugs

29/2003 - Issued 22 December 2003

1. Letter of Intent: Proposal to Amend Civil Aviation Publication (CAP) 371 For the Purpose of Clarifying the Text to Reflect Current Interpretations and Practices

30/2003 - Issued 23 December 2003

1. Use of Cellular Telephones During Aircraft Refuelling
2. Medication and Flying
3. Amendment to the Air Navigation Order 2000
4. Electronic Flight Bag

1/2004 - Issued 9 January 2004

1. Loss of Tail Rotor Effectiveness (LTE)

CAP 455 AIRWORTHINESS NOTICES

Airworthiness Notices have been amended as of 23 October 2003.

The following have Technical or important administrative amendments:-

Number	Issue
1	16
4 Appendix1	2
6	51
6 Appendix 3	16
12	53
12 Appendix 66	1
14	14
14 Appendix 2	6

Number	Issue
24	42
26 Appendix 1	12
29	16
29 Appendix 3	21
33	5
46	18
46 Appendix 1	9
47	6
48	2
63	3
94 Appendix 1	1

The following Notices are cancelled:-

6 Appendix 1
6 Appendix 2
9
13
25
34
44
45 and Appendix
45A and Appendices 1 & 2
48 Appendix 1
56
57
59
60
67
80
93
95

You may register for e-mail notification of amendments at www.caa.co.uk