

CHIRP FEEDBACK

Issue No: 79

Summer 2006

EDITORIAL

LEVEL BUSTS

During the first six months of this year the number of reported level bust incidents has totalled 263, 40% greater than the same period in 2005. Some of the rise is attributable to increased reporting of these events; however, the overall number of reported incidents continues to be regarded by NATS and CAA (SRG) as a significant safety issue.

Longer term measures to address some of the contributory causes are being progressed. In the meantime the NATS/CAA/Industry Level Bust Working Group has produced a reminder of 'Best Practice', which is being distributed with this issue of FEEDBACK.

Take five minutes to review the information or attach it to your flight bag to review during a quiet moment - it might avoid you becoming one of the level bust statistics.

WHAT'S IN THIS ISSUE?

	Page
ATC REPORTS	
Definition of a 'Break'	2
Conditional Clearances.....	2
Rush to Beat Closing Time	3
Emergency Transponder Codes	3
FLIGHT CREW REPORTS	
Speed Control - From the Other Side.....	4
A Further Word on RTF Discipline	4
What's in a Name? Perhaps More Than You Think	5
Handling Proficiency	5
The Right Reporting Culture?	6
More on Standard Weights.....	6
Continuing FTL Concerns.....	7
18-30 Hour Rest Periods.....	7
Roster Stability.....	7
Storage of Crew Food	8
CABIN CREW REPORTS	
Carriage of Intoxicated Passengers	9
FODCOMs	9
Change of Address Contact Details	9

ENGINEER REPORTS

Reactivated Authorisations	10
Redundancy and Safety.....	10
Part 66 Licensing.....	11
Contacting CHIRP	11

Number of Reports Received Since the Last Issue:

ATC - 6

Report Topics Have Included:

Comments on busy frequencies and use of 123.45MHz.
 ATCO Recency and Currency
 Reminder of the meaning of the phrase 'Maintain'
 Comments on the selection of emergency txpdr codes

~~~~~

#### Flight Crew - 71

#### Report Topics Have Included:

More on the use of Standard Weights  
 Level busts - Four-number callsigns  
 Rostering of 18-30 hour Rest Periods  
 Roster Instability  
 Procedure for clearance of Deferred Defects  
 Use of manual thrust  
 Absence Management Policy  
 QRH Smoke Drill  
 Airport name confusion  
 Comments on RTF phraseology

~~~~~

Engineer - 8

Report Topics Have Included:

Re-activated authorisations
 JAR 66 Licence Endorsement difficulties
 Manning levels and competency
 Maintenance Support - Offshore helicopters

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.

Registered in England No: 3253764

Registered Charity: 1058262

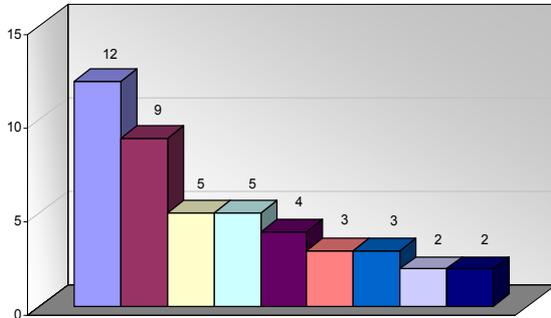
AIR TRANSPORT FEEDBACK is also available on the **CHIRP** website - www.chirp.co.uk

An Air Transport Safety Newsletter

from **CHIRP** the Confidential Human Factors Incident Reporting Programme

ATC REPORTS

Most Frequent ATC Issues Received 12 Months to June 2006



- Communications - External**
(Pilots)
- Procedures**
(Use by Others, Adequacy, Use By Reporter, Lack of)
- Handling/Operation**
(Operation of Equipment, Airmanship)
- Training**
(Technique, Adequacy, Examination/Assessment)
- Air Traffic Management**
(Separation)
- Communications - Internal**
(Managers, Team/Shift/Watch)
- Company Policies**
(Operational, Safety Reporting)
- Airports**
(Runways/Taxiways)
- Pressures**
(Commercial, From Management/Supervision)

DEFINITION OF "BREAK"

Report Text: I wonder if through the good offices of CHIRP it would be possible to elicit from SRG what constitutes "A Break" under the terms of SRATCOH - CAP670.

At the unit at which I work watch managers rarely take what used to be termed 'a responsibility free break'. Management are of the opinion that checking e-mails, responding to administrative matters and attempting to write unit instructions etc during these breaks comes with the territory of being a watch manager. Indeed some have even stated doing such tasks is a break from operational tasks.

Well I guess it is, but I don't think it is in the spirit of CAP670. Two hours on radar followed by a half-hour break attending to the items already mentioned followed by another session in a operational position hardly constitutes a stress free break, especially when the clock is ticking during that break with the knowledge that there is a requirement to be back on the coal face in.....well, after a handover, a comfort break etc what can amount to under 25 minutes. Throw in a trainee de-brief and it's even less.

Complain to management and they quote that often used and currently fashionable management

phrase... 'the company is changing, the bar is being raised'. No one disputes that the company needed to change but the circumstances that staff are working under with inadequate breaks will eventually come home to roost when errors induced by the stress of having one's mind elsewhere (e.g. what do I need to get done during the next break etc) not to say the general fatigue of inadequate rest, manifests itself in an incident or even worse. Perhaps if they would consider it a factor that might harm the business it may concentrate the mind, as that seems to be a governing factor in many decision-making processes currently, the human factor being of secondary importance.

Please attempt to get SRG to give a ruling on what constitutes a break. Yes, it is a break from an operational position but what is the purpose of the break? Is it to regroup one's mental faculties and REST? CAP670 does not state what the purpose of the break is, ATCOs think they know but management have a different interpretation and in my opinion are abusing the meaning of the word break.

I am hoping for a definition along the lines of 'a period of not less than half an hour where an ATCO can sit down with his/her brain in neutral'.

CHIRP Comment: The reporter's query was referred to CAA (SRG) Air Traffic Standards Department who provided the following response:

A specific definition of 'break' is not published currently by ATSD, but it is taken to mean a time between periods of operational duty during which a controller does not exercise the privileges of his or her licence. The CAA considers that breaks are vitally important in ensuring that controllers provide a safe service to aircraft during each period of duty.

Breaks shall include all measures necessary for the individual to ensure that they will not be suffering, to any extent, mental or physical fatigue while carrying out their prime function. Such measures would be expected to include a certain detachment from the operation, i.e. rest areas, some of which should afford the individual 'quiet space', and facilities for adequate refreshment.

Your letter indicates a concern that extraneous tasks may be encroaching on breaks in between periods of operational duties. While "light" ancillary tasks may be acceptable, a task that requires any level of increased concentration, or may be stressful, might not allow a controller to be sufficiently mentally rested and alert for their next period of operational duty. Periods of trainee debriefing, critical to ensuring satisfactory training provision, are not considered to be part of a break in operational duty.

CAP670 Part D is to be reviewed during late 2006/2007.

CONDITIONAL CLEARANCES (FB77)

Report Text: The CHIRP comment at the end of Conditional Clearances includes the correct

sequence for the message. It does not address the ATC issues underlying the problem.

I have heard a number of Watch Training Officers and Local Competency Examiners recognising that a weak point in the conditional clearance loop is the quality or style of the clearance from the ATCO. Typical ATC faults in conditional clearances are ambiguous, badly timed, or inaccurate instructions from the ATCO; or so many successive instructions that everybody's situational awareness becomes confused.

If this is becoming recognised within the industry, can the Air Traffic Standards Department conduct a review similar to that for ATIS Broadcasts?

CHIRP Comment: The phraseology for Conditional Clearances was the subject of an Air Traffic Services Information Notice (ATSIN No.72) issued in September 2005.

The ATSIN highlighted the importance of using the correct phraseology as set out in the attachment to Appendix E - Manual of Air Traffic Services Part 1. The ATSIN also emphasises the importance of using standard phrases and the contribution that non-standard phraseology has made to runway incursion incidents.

In summary, conditional clearances should only be used when necessary, using clear and specific phrases in the correct sequence. It is also vital to ensure that the readback is correct and, if in any doubt, check.

The reporter's suggestion regarding the quality or style of the clearance has been passed to CAA (SRG).

RUSH TO BEAT CLOSING TIME

Report Text: At AAA there is a night jet ban which comes into effect at 23.29hrs local. Some airlines have a quota per year of flights which are allowed to depart after this time but most of the carriers who are scheduled to depart close to this time do not have such an option.

I regularly have aircraft call up at 23.15hrs and say they are doing their best to get to the departure runway on time. There are a number of factors which act against them in this scenario:

- The aircraft are parked at stands which often involve a long taxi to the holding point.
- They are large jets which have longer load times.
- The aircraft often route in similar directions putting pressure on ATC to get them away.

In the past we (ATC) have been made to instruct aircraft, occasionally at the holding point, that they are not allowed to depart and have to night stop. This is primarily not an ATC restriction but an airport one. It often leads to heated exchanges on the R/T which is far from ideal. I fully sympathise with the crews who feel hard done by when they are not allowed to depart and likewise for the passengers.

On occasions I have seen aircraft taxi at very high speed to get airborne before this jet ban. Will they have carried out their pre-flight checks in a similarly rushed manner?

The night jet ban at AAA is something which puts undue pressure on both airlines and ATC and could be better handled by the Airport Authority.

CHIRP Comment: Night jet bans are an environmental restriction and, in the case of most if not all UK airfields where they are imposed, there is no flexibility with respect to late departures.

The commercial pressures and the consequent safety implications of crews rushing to beat an enforced deadline are such that this problem should be managed on the stand/jetway, not at the runway holding point.

It should be relatively easy to measure the time to taxi in normal circumstances from each stand to the runway-in-use and to promulgate these times to operators and ATC; if the standard time is not available, the airport authority should not permit an aircraft to leave the stand.

It is understood that representations to implement procedures similar to those described above have been made by some ATC providers to the relevant airport authority.

EMERGENCY TRANSPONDER CODES (FB78)

Report Text: In CHIRP Comment at the end of this article it is stated that current ATC radar displays automatically retain the aircraft callsign identifier if the squawk is changed. That may be true in Terminal and Area Control but is not the case with all displays. With those I am familiar with at AAA LARS/Approach and BBB Tower, if any of the distress codes are selected by the pilot, we lose the aircraft callsign identifier. The display flashes red with a plain English identifier such as SOS.

Therefore if the aircraft is already identified by an ATC unit, it is preferable only to select an emergency code when instructed by ATC, assuming, of course, that the pilot has been able to communicate the problem to ATC.

However, I agree it is good advice to switch to the appropriate code as soon as possible and wouldn't want to discourage pilots from doing so.

CHIRP Comment: This was one of a number of similar comments that we received on this issue. The reporter correctly points out that although the comment in FEEDBACK 78 was related specifically to a situation of not being able to notify ATC of an emergency on a congested frequency, it should also have referenced the fact that it is the major NATS en route and terminal ATSUs that now have an upgraded secondary radar identification capability.

As several other reporters pointed out, the most recent issue of CAP 413 (Chapter 8 Para 1.4.3) still advises pilots in communication with a civil or

military ATSU before the emergency arises to retain the assigned code until an instruction to change the code is received from ATC.

However, this advice presupposes that RTF contact with the ATSU can readily be made; if this should not be the case, selection of an emergency code should not be delayed unduly; if this should not be the case, selection of an emergency code will alert the controller and allow contact to be made.

CAA (SRG) ATSINS

The following CAA (SRG) ATS Standards Department ATSINS have been issued since April 2006:

Number 85 - Issued 26 April 2006

Operations by Aircraft Deploying Brake Chutes

Number 86 - Issued 16 May 2006

European Union (EU) Directive on a Community Air Traffic Controller Licence - Entry into Force

Number 87 - Issued 16 June 2006

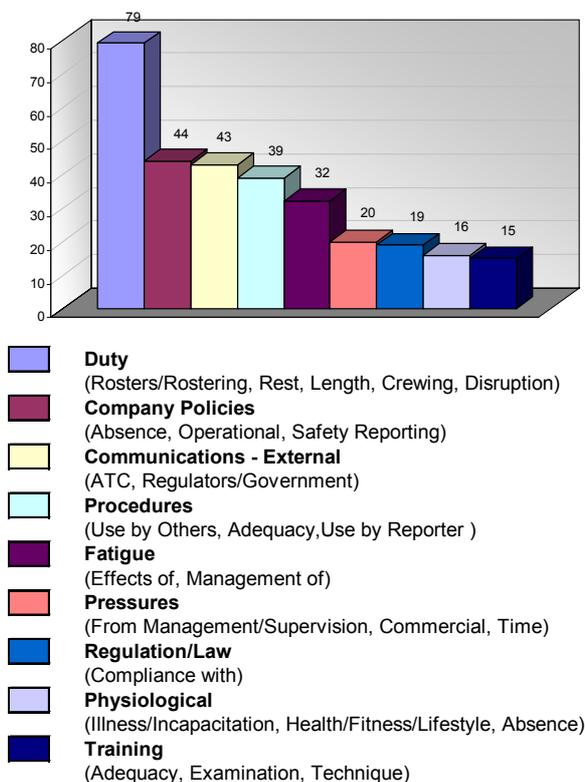
Review of Critical Information and ATIS

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

www.caa.co.uk/default.aspx?categoryid=33 and click on the link 'Search for a CAA Publication'

FLIGHT CREW REPORTS

Most Frequent Flight Crew Issues Received:
12 Months to June 2006



SPEED CONTROL (FB78) - FROM THE OTHER SIDE

Report Text: Re- Issue 78, Sequencing and Speed Control : Our company require us to be at final "bug" speed with approach power set, no later than 1,000' AGL (3.3 nm). If you are light that can mean 125kts or so, which means you can't hold 160kts to 4nm, especially in a tailwind.

Rather than start haggling on an overloaded frequency there is a tendency to do one's best and pull the speed back as late as you can - which can be 5-6 miles out. It's not unusual to be given a speed early on - say 220kts on base leg, and then not hear any more speed instructions at all (however, not at AAA!).

This forces us to use our initiative - and you often can't get a word in to say so.

CHIRP Comment: As has been stated previously, if you anticipate that the conditions are such that you will not be able to maintain the 'standard' 160kt speed limit, advise ATC when the opportunity permits well in advance of receiving the instruction.

If the problem arises at a particular location, report the matter to permit it to be discussed with ATC at a local level.

A FURTHER WORD ON RTF DISCIPLINE

Report Text: Regarding the recent "drive" on RTF discipline, three important (in my view!) points seem to be regularly missed from the exhortations passed to us by the company, CAA (SRG) and CHIRP to improve our RT discipline, which I think are worth reminding people of:

- 1) VERY FEW pilots or controllers routinely use the correct phonetics for numbers. It is not at all common to hear FIFE, NINER or TREE unless there has ALREADY been some confusion (eg incorrect readback). If we use the correct phonetics routinely, then there will be less need for clarifications etc., and RT traffic is reduced.
- 2) SPEED of speaking: As the workload builds up, both pilots and controllers tend to start to gabble. This really is a case of more haste less speed. TV newsreaders work on a rate of 3 words per second, to ensure clarity and understanding. If you rush out your words, the chances of being misheard or requiring a repetition are hugely increased. The snail beats the tortoise every time. It may SEEM like you are wasting valuable airtime, but in the long term I am certain this is not the case. Slow and deliberate (OK, maybe not Texan slow!)
- 3) Colloquialisms. Natural English speakers are the first to rant at (say) French ATC speaking French to French a/c, because we cannot understand them and it reduces our situational awareness. But how do you think the foreign pilot - who knows only standard aviation English - is supposed to

maintain his situational awareness when we start chatting to each other using colloquialisms?

There; that's off my chest - hope you agree and can use it!

WHAT'S IN A NAME? PERHAPS MORE THAN YOU THINK

Report Text: I'm prompted to file this retrospective report by a recent article in Flight International regarding the CAA becoming less tolerant of airport operators that arbitrarily change the name of their airfields. Well, I can report that this can certainly lead to a flight safety hazard.

Last year I was operating into AAA (*UK Regional Airport*) and the weather was unexpectedly close to Cat 1 limits as it was at all the diversion airfields for which we had the fuel, with the exception of East Midlands. Given that AAA were not operating Low Visibility Procedures, a diversion was a real possibility and it would need to be a prompt one at that given the quantity of fuel that we had on board.

Accordingly, we prepared for the diversion, but a major problem presented itself....neither of us could find the approach plates for East Midlands!! Ouch! The only possible diversion and no plates.

Well, by now we know why - Yes, instead of being placed in the "E" section of the approach folder (Book 1) the plates were under "N" in Book 2 since the airfield had been renamed Nottingham (Friar Tuck Intl), or something like that. As it turned out we were able to land at AAA, but had we been unable to do so it would have been a different story.

To date a very confusing situation still exists, since all the ATC services at EMA are referred to as "East Midlands", as is the reference to the airport on London Volmet, but, the AERAD booklet refers to the place as Nottingham!

CHIRP Comment: The CAA Notice to Aerodrome Licence Holders (NOTAL) 3/2006 sets out the CAA Policy on the naming of aerodromes for aeronautical purposes and states that it is important to ensure that there is no detrimental effect on aviation safety.

As the UK AIP reference is now 'Nottingham East Midlands', the continued use of 'East Midlands' as the RTF identifier is potentially confusing, particularly for non-UK crews who may be unaware of the background to the change, and should be reviewed.

The matter has been referred to CAA Air Traffic Standards Department.

HANDLING PROFICIENCY

Report Text: On approach to AAA we experienced moderate turbulence and windshear from approx 6,000' amsl and below.

On final, the airspeed was erratic and the autothrottle was failing to maintain IAS within 10kts of target despite large thrust changes which were destabilising

the aircraft in pitch. The result was a fairly unstable approach and arrival at the threshold with a very high power setting. This aircraft is notorious for floating and it was difficult to achieve a positive touchdown, which, coupled with the strong crosswind resulted in a less than ideal touchdown drifting to the right. Got away with it and would have gone around if there had been serious doubts about continuing.

We debriefed and discussed why we didn't do the obvious...; use manual thrust. Some time ago, the company decided to forbid the use of manual thrust on this type. Now, I am aware that as the Captain, I can elect use it if I have to in an emergency or failure case. So why didn't I?

1. For the last 3 years I have had NO real practice in using manual thrust. We get to play with it for an hour in a simulator once a year, but the simulator DOES NOT in any way represent the use of manual thrust in a real, randomly variable set of conditions and is next to useless in giving crews confidence in its use on the line. We did not feel that our skills and training were up to the task of reverting to manual thrust on a challenging approach in turbulence.
2. Our management have shown an increasing capacity for challenging flight safety decisions made by Captains on the day. In some cases the approach has amounted to bullying with barely disguised 'career' threats being made on one occasion. So, do I feel confident in tearing up a management edict in a non-emergency situation? No.

Incidentally, 5 years ago I would have happily put my name to an ASR over this. Now, I fear to do so, despite being a confident pilot and an experienced TRE/TRI.

Someone is flying my aircraft from their office, with their own accountability/targets aforethought.

CHIRP Comment: Achieving the right balance between maintaining an adequate proficiency in manual handling skills and using the highly reliable automated flight control systems (AFCS) and autothrust (A/T) systems that are in wide use today is a somewhat contentious issue.

Some advanced flight deck configurations were designed to be flown with the autothrottles engaged. Thus, it might be argued that the evidence from Flight Data Monitoring of speed/flight-path errors arising from manual thrust control, combined with the demonstrated Mean Time Between Failures of modern A/Ts, is sufficient to justify a policy such as that described in this report as the safer option.

The contrary view is that such a policy might lead to some individuals' confidence in their manual flying skills reducing, which in time might compromise an individual's ability to deal with an albeit rare abnormal/emergency situation which has deprived the crew of some level of automation.

It should be the role of management to assess the risk of a loss of competence and to review the operational procedures and crew training needs accordingly. For example, in a case where an operator mandated use of the automation, would a Minimum Equipment List alleviation to permit operations with the autothrust system unserviceable be appropriate and, if so, for how long and under what conditions?

In the specific case described in this report, if unpractised in using manual thrust, it would have been unwise to attempt a manual thrust landing in turbulent conditions, irrespective of the company procedures. If the approach becomes unstable with autothrust engaged, always consider the option of a go-around.

THE RIGHT REPORTING CULTURE?

Report Text: Climbing through FL122 we got a Cabin Altitude Warning. Levelled off then descended to FL100 with ATC permission. Couldn't get the aircraft to pressurise. The First Officer confirmed that he was sure he had checked that the air conditioning PACK switches were on after start and that he had checked them both after T/O and climbing through FL100.

Eventually went to manual pressurisation, then back to auto - the aircraft pressurised. We continued the sector and reported the problem to the Company on return. An FDR (*Flight Data Recorder*) download was carried out.

Subsequently, I was interviewed and told that the FDR evidence suggested that the most likely reason that the aircraft had not pressurised was that the PACK switches had not been put ON after start. (The position of the PACK switches are not directly recorded on the FDR.)

I reported the incident to help the Company identify a possible fault with the aircraft; I needn't have done so as no-one would have known.

For my diligence I received a disciplinary interview.

CHIRP Comment: The reporter acted correctly in response to the flight deck warning and, as the cause of the problem was not apparent to the crew, was quite correct to submit a report to the company.

The management response to the report, if as stated, was unenlightened and unlikely to promote a benchmark 'open' reporting culture.

MORE ON STANDARD WEIGHTS

CHIRP Narrative: Following the publication of reported concerns about the appropriate use of standard passenger/baggage allowances in FB77, we have received further reports on the same topic:

(1)

Report Text: I wish to express my continuing concern at the CAA's continued approval for airlines to use

standard baggage weights when actual weights are available. It is common amongst charter airlines for them to adopt a standard baggage weight which is then used for mass and balance calculations.

There are flights where passengers have been allocated a higher baggage allowance than these standard adopted weights. For example, skiing holiday flights to a high altitude destination where the take off performance is limited on the return sector and yet no account is taken of the additional weight of skis & boots, resulting in the aircraft departing many tonnes heavier than the crew believe it to be. Other examples are cruise ship charters, where passengers' baggage exceeds the standard allowances. This obviously reduces the safety margins at ALL phases of flight.

CAA approval to adopt a standard baggage weight is given to airlines on a purely commercial basis. Safety margins are there for a purpose, and reducing them for commercial gain appears to me to be inappropriate and unsafe.

(2)

Report Text: I recently operated a long haul flight prior to which the aircraft was changed from G-AAAA to G-BBBB, which had a Maximum Take Off Weight (MTOW) approximately 4 Tonnes greater than G-AAAA.

The sector required tankering, but as the Zero Fuel Weights are notoriously unreliable, we planned for a Take Off Weight approximately 7 Tonnes below the MTOW (max fuel load), knowing that we would be within limits for both Take off and landing on G-BBBB and, if the aircraft were changed again to one with a lower MTOW, we would still be OK.

Our final load sheet gave us a Take Off Weight approximately 4T below the MTOW using 15kg/bag. The hold was bulked out and the dispatcher advised me that the real average bag weight was probably 22kg/bag, giving another 2.5T. We adjusted the thrust de-rate - but not the load sheet - to reflect the likely MTOW.

If we had been in G-AAAA or one of the other aircraft with the lower MTOW, we would, in reality, have been overweight. However, the prospect of proposing the use of actual weights versus the CAA standard allowance would probably have incurred displeasure. One captain (with the load sheet showing 3 Tonnes over the MTOW) has been subjected to the argument from a senior manager that the aircraft has the performance for the higher MTOW even though the lower MTOW limit is clearly stated in the documentation.

I believe that baggage weights are an industry problem - particularly for some destinations, such as Africa. Bearing in mind the accident with an overweight aircraft in the USA, perhaps the CAA should review the baggage allowances.

CHIRP Comment: As was explained in FB77, the use of standard passenger and baggage weights is permitted by JAR-OPS 1. In cases where a significant number of passengers and/or bags is known to exceed the standard weight allowances, JAR-OPS requires an Operator to either weigh the passengers and/or baggage or use an increment to the relevant standard weight. [JAR-OPS 1.620 (h) & (i) refer.]

In order to meet the JAR-OPS requirement, operators should have a procedure for determining the criteria for triggering and implementing the change from the use of standard weights to actual weights. Given the aircraft commander's ultimate responsibility for the safety of an aircraft, it is reasonable to assume that he/she should also be fully aware of how the change is triggered. Are you?

It is understood that CAA (SRG) is reviewing current procedures.

Finally, as stated in a previous issue, the JAA is in the process of confirming whether the current standard passenger and baggage weights remain appropriate.

CONTINUING FTL CONCERNS

CHIRP Narrative: In the summary of FTL-related reports received during 2005 that was published in the last issue of FEEDBACK, two of the principal concerns raised by reporters were the increasing use of rest periods of between 18 and 30 hours and the level of roster disruption experienced by some flight crew members.

In the period from 1 January to 30 June 2006, we have received a further 44 FTL-related reports; this compares to a total of 66 reports on the same topic received during the period from 1 January to 31 December 2005. The principal concerns continue to be 18-30 hour rest periods and roster instability.

When categorised by operator (Figure 1); the pattern of reporting indicates that these particular FTL concerns would appear to be confined to two UK operators, both of whom also featured prominently in similar reports submitted in the second half of last year.

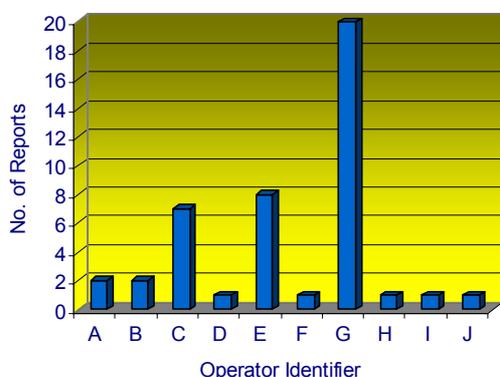


Figure 1

The following two reports are typical of those received this year:

(1) 18-30 HOUR REST PERIODS

Report Text: I'm concerned that the rostering department at ##### appears to have no concern for crews' circadian rhythms; they are only interested in what's legal.

Today I have been changed from AM standby (day 1); AM standby (day 2); 05:30Z report (day 3) to an afternoon flight going into the next morning (days 1/2), 29 hours off and then the 05:30 report (day 3).

When I complained, I was told that "you know how things are on your fleet; someone has gone sick and I sympathise, so I'll see what I can do". After speaking to the rostering department, and explaining that I thought I would be unable to obtain adequate rest, another roster change quickly appeared, giving me nearly 32 hours between duties.

The fact that a change from an unacceptable duty to something reasonable was forthcoming so quickly, serves, in my opinion, to confirm that avoidance of 18-30hr rest periods is not a priority, even when it is easy to do. Though rostering personnel are often very busy and generally try their best with limited resources, I don't think its part of their training or ethos to avoid 18-30 rest periods. I'm not sure if crewing staff levels are currently sufficient to manage the schedule effectively.

(2) ROSTER STABILITY

Report Text: I am at a loss as to who to turn to. I am getting so many roster changes I am sure it is only a matter of time before I fail to report for the correct flight. At last count, I had 195 changes covering the past 14 months. During this time I have only completed just over 150 flying days!! I accept that all airlines go through periods of disruption for various reasons but in this company it is continuous and has been for at least 3 summers.

I have just been telephoned yet again on a day off telling me I have been changed for the next 2 days. This is the second change for these 2 days, originally rostered as an early standby followed by an early start. Changed to 2 lates, which interfered with my weekend off planning, but just as I'd sorted my family transport out, I have been changed to an early standby and another early starting over 3 hours before my original early.

If you are having difficulty following then you are with me!! So I asked why? I'm running short of hours (that will be the company contractual 90hrs/28 day limit). It comes as no surprise to me that I am running up to my limit, as we always do in the summer season.

So why should it take until the day before for my company to note it? We are being rostered legal minimum days off because the company don't want

to have to buy extra days back but if they do try, the roster falls apart because we are all up to our limits. Personally, I don't find the hours limits too fatiguing but the time and stress of trying to organise family life and other essential domestic appointments is not only wearing me down, it is becoming impossible. I can only plan on my days off; not even the night before a day off is possible.

The problem seems to stem from a lack of resources but it seems that also the roster is open to changes from too many departments, some of whom either do not know the limits or choose to ignore them. When I mention that I'm not entirely happy with all this disruption I have been told that as I get paid more than an ops assistant then I should expect more disruption than an ops assistant. I was too polite to ask them how much their training cost or when they last did a base check, line check or IRT.

CHIRP Comment: The argument that is often presented in defence of rostering practices such as those described above is that they are legal and thus are, by definition, not fatiguing.

CAP 371 - The Avoidance of Fatigue in Aircrews, on which UK operators' Approved FTL schemes are based, are precisely as the title implies - guidelines. As such CAP 371 places general responsibilities on an operator in addition to the specific limitations contained in the CAP, such as on (Section A) Page 2 Para. 2.3 a) which states:

"The allocation of work patterns which avoid such undesirable practices as alternating day/night duties, the positioning of crew so that a serious disruption of established sleep/work patterns occur, or scheduling rest periods of between 18 and 30 hours especially after long flights crossing many time zones".

It is difficult to understand how the frequent rostering of rest periods between 18 and 30 hours and the roster instability described in confidential reports complies with the current wording of CAP371. Moreover and perhaps of more significance, is that on the basis of reports received through this Programme, most UK AOC Holders, including those who operate a similar mix of routes, appear to be able to operate more closely in compliance with their overall responsibilities, as set out in CAP 371.

This is a matter that CAA (SRG) might wish to consider.

STORAGE OF CREW FOOD

Report Text: I am concerned about the on-board facilities to store our crew food - we usually don't have any!

Whilst our sandwiches and meals are delivered chilled to the aircraft the food items then sit in the back galley without any means of controlling the temperature. There are no cool bags or carts and no dry ice - as has been the case in other airlines I have worked for. Our duties are typically 2-6 sectors days

of between 7 hours and 11 hours duration. This is before any of the inevitable delays and disruptions that are a regular feature of any airline.

Surely food that has been sitting around for ten hours or more at between 20 and 30 degrees centigrade cannot be safe to eat? I don't believe this would be acceptable in a restaurant or shop and common sense would suggest that it is downright hazardous on-board the aircraft. Sporadically cool bags and dry ice are supplied to maintain the temperature - surely these should be a daily requirement rather than a random occurrence once every few weeks or months.

The company cabin crew manual guidance on food hygiene agrees with me but what is written is not being practiced. Proper storage with respect to temperature is neither implemented by the caterers nor enforced by the company. Interestingly, the sandwiches available for the passengers to purchase are always protected by cool bags and dry ice so it will only be the crew members who get food poisoning. Unfortunately, this happened recently on a flight.

This issue has been raised on a number of occasions without any effective response or change in policy. I am concerned this matter is not being given due priority and that the safety of our crews and passengers is being compromised by unnecessary risk.

CHIRP Comment: The advice of the Chief Medical Officer CAA was sought as to what guidelines, if any, existed for on-board crew meals.

The CAA does not provide guidance regarding food storage for crew on aircraft, nor is oversight exercised in respect of the provision and storage procedures for on-board food. The advice from the CAA Health, Safety and Environmental Adviser is that the responsibility for food on board aircraft is that of the local borough council for the UK base of operation.

Moreover, the CAA does not intend to include provisions for crew meals in the guidance material issued by the Civil Aviation Authority on the Civil Aviation (Working Time) Directive, but the CAA's Health, Safety and Environmental Adviser and Head of Aviation Health Unit will monitor any reports that they receive and, if a need for specific guidance becomes apparent, this position could be reviewed.

Notwithstanding the above, the CAA Medical Department contacted the operator, who advised that the company policy was to replace crew sandwiches, if not consumed within 6 hours. The operator had not received reports of any health problems blamed on crew food but that any reports sent in would be followed up.

Given the increasing pressure on crewing ratios and the increased focus on minimising flight crew sickness absence, where crew sandwiches/meals are provided, it could be concluded that it would be in the company's interest to ensure compliance with

its own procedures to minimise the risk of a food – related illness.

CABIN CREW REPORTS

CARRIAGE OF INTOXICATED PAX

CHIRP Narrative: We have received a number of cabin crew reports in which reporters have expressed concern about the increased number of occasions on which passengers, who are apparently intoxicated, have been permitted to board an aircraft:

Report Text: During boarding the In Charge told me that three passengers appeared to be drunk and that we would be carrying them, as they had been told they would not be not allowed any more alcohol on board. I stated that I was not at all happy about this as it was a clear violation of company SOPs. The In Charge told me that they would notify the Captain of my concerns and report back to me. A few minutes later, the In Charge, accompanied by the Captain came to chat to me in the galley and both reassured me that the 'three' had been told there was no way they would be served any further alcohol on board. The Captain then told me that he would take full responsibility for carrying them and also that he was prepared to divert the aircraft should they cause any problems in flight. I reiterated the fact that I was most unhappy with their decision which was clearly in breach of safety regulations. The Captain told me I had 'an attitude'.

My colleagues also expressed their concerns and we were all told that we would be carrying the passengers anyway as both the Captain and the In Charge predicted that as they were so drunk they appeared drowsy and would probably just sleep throughout the flight. They didn't. During the flight they continually asked for drinks and made a nuisance of themselves by arguing and bemoaning the 'unfairness' of the situation.

Shortly after take-off the Captain contacted me by interphone to apologise for the disagreement before take-off, and told me he had used his 'instincts' when deciding to take the three passengers in question. He also told me to keep him posted should there be any problems.

In my opinion the decision to carry these passengers was in breach of SOPs and had there been any sort of emergency on this flight, these three would most certainly have proved a hindrance to other passengers and would definitely have been in no position to follow any safety procedures. I am reporting this incident because I believe it was wrong to carry them in full knowledge that they were indeed drunk - apparently the ground staff were aware of their condition too and should never have even checked them in.

I hope that this report goes some way to ensuring that a poor decision like this will not occur again.

CHIRP Comment: The Air Navigation Order states that a person shall not enter any aircraft when drunk, or be drunk on any aircraft. However, assessing whether a passenger is fit/unfit to travel is often very difficult, particularly when they have been permitted to board, and can often be a judgement call by the In-Charge or the aircraft commander, as in this case.

In reaching a decision, it should be remembered that the effects of alcohol are exacerbated by reduced cabin pressure and that passengers who board in an intoxicated state or become intoxicated after boarding can become a danger to themselves, other passengers and the cabin crew, not to mention their possible reaction to an in-flight emergency or an emergency evacuation.

A number of UK operators have clear policies on assessing a passenger's fitness to travel as part of their corporate risk management process. The assessment is best made before the passenger boards to avoid a confrontational situation developing with the cabin crew, who then have to operate the sector with the passenger.

CAA (SRG) FODCOMS

The following CAA (SRG) FODCOMS have been issued since April 2006:

7/2006

1. General Permission - Compliance with the Applicable Provisions of the Air Navigation Order 2005 Article 44 and Schedule 1 to the Air Navigation (General) Regulations 2006.

8/2006

1. The Use and Misuse of Frequency 125.5 MHZ

9/2006

1. Letter of Intent: Proposal to Amend the Air Navigation Order 2005 - Carriage of Vibration Health Monitoring System (VHM) on Helicopters

10/2006

1. Flight Operations Inspectorate (Training Standards) Training Symposium and Crew Resource Management (CRM) Forum - 2006

CAA (SRG) Flight Operations Department Communications are published on the CAA (SRG) website - www.caa.co.uk/default.aspx?categoryid=33 and click on the link 'Search for a CAA Publication'

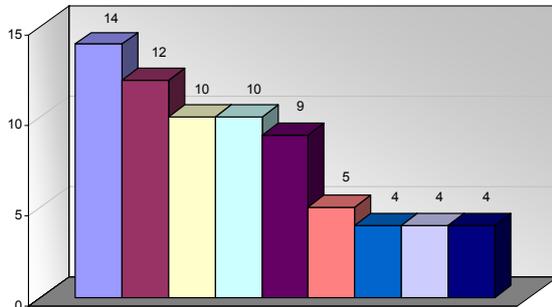
CHANGE OF ADDRESS

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 (including your licence number) to Personnel Licensing, CAA (SRG), Aviation House, Gatwick Airport South, West Sussex RH6 OYR:

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

ENGINEER REPORTS

Most Frequent Engineering Issues Received: 12 Months to March 2006



	Maintenance (Base, Line, Standards/Workmanship)
	Procedures (Use by Others, Adequacy, Existence)
	Company Policies (Operational, Safety Reporting, Disciplinary/Grievance)
	Pressures (Commercial, From Management/Supervision, Time)
	Regulation/Law (Compliance with)
	Aircraft Technical (Systems, Design, Propulsion, Structure)
	Documentation (Currency/Validity, Suitability/Adequacy)
	Resources (Manpower/Personnel, Facilities, Tools/Equipment)
	Training (Adequacy, Examination/Assessment)

REACTIVATED AUTHORISATIONS

The following report was one of several received on the same topic:

Report Text: As engineers who previously held an ### (Aircraft type) authorisation but not having worked on one for 10 years, we are now being asked by our company to reactivate our previously deactivated authorisations.

Quality department procedures clearly state that an experience logbook must show 6 months experience in the previous 2 years on at least some of the systems otherwise the authorisation becomes deactivated. They also state that if logged recency has not taken place for more than 5 years, a full training authorisation course procedure must be carried out.

We have been told that the airline computer system did not formally deactivate our authorisations until 4 years, 11 months and 14 days ago (approximately 5 years after we last worked on one) and that we would be required to start gaining experience now and submit a dated authorisation reactivation form which would be held on file by the quality department until the required experience had been gained. The argument that we have been working on other

aircraft produced by the same manufacturer has also been used as justification for the lack of requirement for proper recency.

This appears to be a case of blatant bending of the rules to the extreme in order to avoid retraining and appears to have the backing of the company's own quality department. The written procedures laid down by the quality department are totally contradictory.

CHIRP Comment: The reporters' concerns were represented to CAA (SRG) to permit the matter to be reviewed.

The regulatory requirements related to reactivating an authorisation do not stipulate a specific time frame although the company procedures defined a period of five years as reported. The company had proposed a short period of training for the reinstatement of the certification authorisations, as well as each individual being required to complete a limited number of familiarisation tasks (recorded in the personal experience record). The former to bring the individual back up to speed from the type perspective, the latter to allow the individual to practically re-familiarise themselves with the aircraft layout and systems. For those individuals who had been working on similar types by the same manufacturer, this can be taken into account and thus reduce the need for re-training based on the common design and maintenance philosophy.

After discussions between the company and the CAA, the company quality department elected to issue clarified guidance.

REDUNDANCY AND SAFETY

As with the previous report, this was one of several reports received:

Report Text: I work as a Certifying Engineer in the Base Maintenance facility for a large airline, which has recently announced that heavy maintenance is to be outsourced. This will result in the closure of the heavy maintenance facility causing a large number of redundancies.

The company and unions are presently in the process of consolidation which we are told will take several months. During this period the hangar workload is to remain as normal, maintaining both company and third party aircraft.

Whilst most of the affected employees are at present maintaining a professional attitude, I have serious concerns regarding the safety of the work being carried out on the aircraft. I feel that the environment in which we are operating is totally inappropriate for aircraft maintenance. People working on the aircraft and in the support departments are clearly under a lot of pressure following this announcement. In my view even the constant distraction of mobile phone calls is enough to cause a potential incident especially as these calls are often regarding future employment opportunities.

The management are addressing the redundancy process in an inappropriate and haphazard manner, their actions appear to have no regard to aircraft or personnel safety.

These redundancies and the change of the maintenance schedules are also causing 'knock-on' effect throughout the company. I consider that morale is presently so low that aircraft safety is being compromised.

I hope that you look at my concerns seriously and do not feel that that this is being written due to 'bitterness' towards my employer.

CHIRP Comment: The reporter's concerns in relation to safety were represented to the relevant accountable manager.

On receiving no acknowledgement or response from the company, the CAA was advised of the concerns that had been raised through confidential reports and subsequently provided the following response:

The CAA has no authority to interfere in the industrial relations in an organisation facing restructuring. It does however view any such change as having the potential to cause upset to an established system. In such cases the CAA will monitor the changes taking place. In this case having identified a shortfall in the capability of the quality organisation department required the organisation to increase resources in that area. Attention was also paid to the proposed programme of reassigning aircraft checks to other organisations and the CAA carried out assessments of the arrangements.

PART 66 LICENSING - A LEVEL PLAYING FIELD?

CHIRP Narrative: During the transition to Part 66 licensing, we have received a number of reports alleging that the criteria established for the issue of Part 66 Licence qualifications and applied by the UK CAA are not being applied equally by some Member States; reporters have noted that not only does this effectively discriminate against UK Licensed engineers, but if correct could result in a lowering of professional competency and thus could have potential safety implications. The concerns expressed on this topic have been represented to CAA (SRG).

EASA has accepted that there are some issues associated with the implementation of Part 66 in some Member States and the Standardisation Director indicated in a letter dated October 2005 that these issues were being looked into as a matter of some urgency as part of EASA's standardisation programme:

**EASA COMMUNICATIONS/13/2005
COLOGNE, 05/10/2005**

**MAINTENANCE LICENCES: ACHIEVING A LEVEL
PLAYING FIELD ACROSS EUROPE**

New maintenance licences for large aircraft are to be issued across Europe solely in accordance with Annex III of the Regulation 2042/2003 (Part 66, issuance of aircraft maintenance licences). Existing national licences will have to be converted within a year. The transition period in which Member States could derogate from this rule ended on 28 September 2005.

Member States and their competent authorities are responsible for the enforcement of this Regulation to the standard legally required. The role of the European Aviation Safety Agency is to make sure that the Regulation is implemented in a harmonised way throughout Europe.

The Agency is closely monitoring the implementation of Part 66 (issuance of aircraft maintenance licences) and Part 147 (maintenance training and examination organisations). The purpose is to avoid differences in interpretation and to achieve a level playing field across Europe (25 EU Members + Iceland and Norway).

Improvement is measured through standardisation inspections, review with National Aviation Authorities and feedback from stakeholders. The Agency will also launch dedicated investigations in countries where difficulties appear in the implementation of rules.

The outcome of these initiatives will be presented at regular intervals in ad-hoc meetings and on the EASA website.

CHIRP Comment: The effectiveness of EASA's oversight of the implementation of uniform regulatory and licensing standards is one of the most important elements in ensuring that the objectives of a pan-European Aviation Safety Agency are realised. The anecdotal evidence from reports submitted to this Programme is that significant improvements in the oversight of the regulation of engineer licensing are still required.

If you are aware of any areas where differences in interpretation exist, report the matter directly to the CAA or to us.

CONTACT US

Peter Tait	Director Flight Crew/ATC Reports Eng/Maintenance Reports
Kirsty Arnold	Cabin Crew Programme Manager Circulation/Administration Cabin Crew Reports

--oOo--

CHIRP
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@chirn.co.uk

CHIRP

PILOT/FLIGHT CREW REPORT FORM

CHIRP is totally independent of the Civil Aviation Authority and any Company/Airline

NAME: _____	1. YOUR PERSONAL DETAILS ARE REQUIRED ONLY TO ENABLE US TO CONTACT YOU FOR FURTHER DETAILS ABOUT ANY PART OF YOUR REPORT. 2. YOU WILL RECEIVE AN ACKNOWLEDGEMENT AS SOON AS POSSIBLE. 3. THIS WHOLE REPORT FORM WILL BE RETURNED TO YOU. No RECORD OF YOUR NAME AND ADDRESS WILL BE KEPT
ADDRESS: _____	
POST CODE: _____ TEL: _____	

PLEASE COMPLETE RELEVANT INFORMATION ABOUT THE EVENT/SITUATION

YOURSELF - CREW POSITION			THE FLIGHT/EVENT								
CAPTAIN	<input type="checkbox"/>	FIRST OFFICER	<input type="checkbox"/>	DATE OF OCCURRENCE		TIME		(LOCAL/GMT)			
PILOT FLYING	<input type="checkbox"/>	PILOT NOT FLYING	<input type="checkbox"/>	LOCATION		HEIGHT/ALT/FL					
FLIGHT ENGINEER	<input type="checkbox"/>	OTHER CREW MEMBER	<input type="checkbox"/>	TYPE OF ATC SERVICE		DAY	<input type="checkbox"/>	NIGHT	<input type="checkbox"/>		
THE AIRCRAFT			TYPE OF FLIGHT			TYPE OF OPERATION					
TYPE/SERIES			IFR	<input type="checkbox"/>	VFR	<input type="checkbox"/>	PASSENGER	<input type="checkbox"/>	TRAINING	<input type="checkbox"/>	
NUMBER OF CREW			OTHER:	<input type="checkbox"/>			FREIGHT	<input type="checkbox"/>	OTHER:		
EXPERIENCE/QUALIFICATION			WEATHER			FLIGHT PHASE					
TOTAL HOURS		HRS	VMC	<input type="checkbox"/>	IMC	<input type="checkbox"/>	TAXI	<input type="checkbox"/>	TAKE-OFF	<input type="checkbox"/>	
HOURS ON TYPE		HRS	RAIN	<input type="checkbox"/>	FOG	<input type="checkbox"/>	CLIMB	<input type="checkbox"/>	CRUISE	<input type="checkbox"/>	
TRG CAPT	<input type="checkbox"/>	TRE	<input type="checkbox"/>	ICE	<input type="checkbox"/>	SNOW	<input type="checkbox"/>	DESCENT	<input type="checkbox"/>	APPROACH	<input type="checkbox"/>
OTHER QUALIFICATIONS:			OTHER:				LANDING	<input type="checkbox"/>	GO AROUND	<input type="checkbox"/>	
THE COMPANY											
NAME OF COMPANY:											

ACCOUNT OF EVENT - (PLEASE CONTINUE ON ADDITIONAL SHEETS IF NECESSARY)

The UK Confidential Human Factors Incident Reporting Programme



PLEASE PLACE THE COMPLETED REPORT FORM, WITH ADDITIONAL PAGES IF REQUIRED, IN A SEALED ENVELOPE (no stamp required) AND SEND TO:

CHIRP • FREEPOST (G13439) • Building Y20E • Room G15 • Cody Technology Park • Ively Road • Farnborough • Hampshire • GU14 0BR • UK

Confidential Tel (24 hrs): +44 (0) 1252 395013 or **Freefone** (UK only) 0800 214645 and Confidential Fax: +44 (0) 1252 394290

Report forms are also available on the **CHIRP** website: www.chirp.co.uk