

CHIRP FEEDBACK

Issue No: 96

Autumn 2010

CHIRP - NEW ADDRESS/TELEPHONE/FAX NUMBERS

Please note that at the end of October 2010, CHIRP relocated to a new office in Farnborough.

Our new postal address is: **26 Hercules Way, Farnborough GU14 6UU**. (Please note our new FREEPOST address at the foot of this page). Our Freefone telephone number and e-mail address will remain unchanged (see the foot of this page).

Our new office telephone/fax numbers are: **Tel: 01252-378947**

Fax: 01252-378940

WHAT'S IN THIS ISSUE?

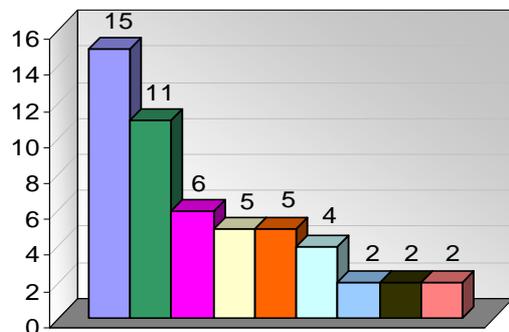
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If you wish to contact the CAA Flight Operations Inspectorate or to report any safety matter which is outside the scope of the MOR Scheme directly to the CAA please e-mail the Authority at:

flightoperationssafety@caa.co.uk

ENGINEER REPORTS

Most Frequent Engineering Issues Received:
12 Months to September 2010



- **Maintenance**
(Line, Base, Repairs)
- **Company Policies**
(Absence, Operational, Safety Reporting)
- **Communications - External**
(Comments re:CHIRP)
- **Airports**
(Infrastructure)
- **Regulation/Law**
(Compliance with)
- **Security**
(Ground)
- **Training**
(Inadequate Specification/Requirements, Technique)
- **Resources**
(Manpower/Personnel - Inadequate Provision)
- **Pressures**
(From Management/Supervision)

PART 66 - MORE ON A LEVEL PLAYING FIELD?

Report Text: Reference the comment in FEEDBACK issue 95; whilst EASA are holding workshops on standardisation people in other EU states are getting jobs!

I worked with an engineer licensed by an EU Member State who had a helicopter type on his Licence; on his

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

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own admission he had never touched one. Another had been licensed by a second Member State for all series of a second aircraft type after having helped on a 'B' Check once, whilst a third 'qualified' chap with whom I worked I wouldn't let put air in my bicycle tyres. So carry on deluding yourselves whilst our European colleagues snap up the jobs.

Why doesn't the CAA do the sensible thing and give the chaps a full B1 or B2 on the strength of their old BCAR licence and stop hamstringing British Licensed Aircraft Engineers.

CHIRP Comment: As outlined previously, at the outset of implementing Part 66 standards the 'playing field' was far from level across the EU; some NAAs placed reliance on ICAO licence standards, by validating the licences from other States, not having previously developed a licensing system of their own. Others had a comprehensive system of academic qualifications with more emphasis on company approval/authorisation schemes. Obviously, the EU Member States will gradually move to align with the new European requirements now outlined in Part 66. In the interim, EASA has made every effort to ensure that a common understanding of the standard exists, including audits and workshops.

An audit of each State's compliance with the requirements is performed under a European Standardisation Regulation. However, due to prevailing legal responsibilities under EU law, having identified inconsistencies in a Member State, EASA has no authority to take action. The responsibility for redressing the situation rests with the European Commission which to date has apparently taken no firm action on Agency recommendations.

All EU NAAs are bound to comply with EU regulation, the issue regarding standardisation is how each NAA interprets the requirements and this can vary considerably based on its previous experience. It is the variety of the previous licensing or qualification systems that lead to the variety of interpretations that have been applied. CHIRP will continue to lobby EASA to ensure common standards are applied, but accepting the lowest common level is not the answer for ensuring safety in maintenance.

It is important to note that this and other similar reports received suggest that licensing standards are not the only issue. Approved Maintenance Organisations have a direct responsibility for ensuring that individual engineers undertake adequate competence checks before they provide an individual with the rights to issue a CRS; a licence does not confer that authority on its own. The endorsement of the licence with a type rating does not necessarily mean that further training on a specific variant is not needed and certainly does not attest to recency of experience either. There can be no substitute for proper training in combination with appropriate levels of experience for a type qualification.

MISSED OUT ON GRANDFATHER RIGHTS

Report Text: A lot of companies are bringing in the "you have to have a minimum requirement of a Cat A licence

to work here" scheme, which is going to put a lot of great mechanics with years of experience either out of work or being made redundant, just because they weren't given 'Cat A licence' approval by their Quality departments approx 5 years ago.

The CAA have made this part of the industry a bit of a joke letting people before a certain date have a Cat A licence whilst others are not getting a look in !!!

For instance, a 17 year old guy comes out of college gains an additional 1 year experience and has a Cat A licence with little knowledge or hand skills compared to an unlicensed mechanic with hand skills/knowledge accrued over 15 years of experience, I know who I'd rather look after my aircraft!!!!

It all seems very wrong and the future English air safety is looking bleak.

I believe that the old company approval system was better, approving someone who knows the job backwards is better than approving someone that hasn't got a clue, which the CAA are promoting using this Cat A licence system. What was wrong with the approval of people who had the experience and expertise, now it is approval of the person who has no experience but has paid £4500 for the course most people over 30 probably got by grandfather rights anyway as there wasn't a course.

A lot of companies don't provide Cat A licence courses or training, you have to take ab initio exams, it seems rather unfair and I expect thousands of people are 'stamping out' planes under grandfather rights who never took these exams. Until we changed to the EASA system most of them had company approvals, so why don't we accept company approvals instead?

It appears to be a better system when you know the person has been through Quality assessment and developed to a point of being responsible and safe, 200 multi choice questions won't make you a responsible and safe engineer. Experience, hand skills and knowledge on the job does.

CHIRP Comment: During the transition period for implementing Part 66 licence standards, which ended in June 2005, the CAA provided individuals and approved maintenance organisations with detailed information on arrangements for granting a licence under Grandfather Right provisions. Organisations were encouraged to discuss with the Authority the actions required by them for interpreting those requirements. Clearly, where the company's system fell short of the required standards for compliance, there was a cost implication.

Whilst some organisations fully embraced the additional training necessary to issue a cat A licence under Grandfather Rights, others did not. Despite the JAA having set out a transition period to 2010, EASA set a more restrictive time scale and end date for the transition period for NAAs and Organisations to take action. No retrospective rights were permitted after the introduction of the new rules (2001).

Whilst the sentiments expressed by the reporter are understood, it appears at the time such individuals did not avail themselves of the opportunity to meet the transitional requirements and once formally implemented, the only way to become qualified was by

meeting Part 66 standards at the appropriate licence level.

The ability to apply Grandfather Rights by member states varied considerably due to the prevailing academic structures in place at the time of transition. Some states had education standards that better met EASA (JAR) Part 66 requirements; however, it was deemed that the UK did not. To date, initiatives to persuade the various boards that set national academic requirements in the UK to align their standards to Part 66 have not been successful, therefore setting an additional hurdle for young UK engineers.

In the above example given by the reporter, the skills outlined can still be applied within a base maintenance as a cat A licence is not a requirement in that environment, task clearance being supported by a company issued authorisation based on a competence assessment; however, it is recognised that as part of this assessment some organisations may require an individual to be a cat A licence holder.

AIRWORTHINESS MANAGEMENT - OUT OF CONTROL?

Report Text: As the latest bandwagon of 'Human Factors and Safety Management Systems' rolls into town bringing all the worlds preachers of the safety religion, there appears to be a reluctance or willingness to practice what is preached.

There has grown up over the years a band of 'Travelling Mulberry Men' that participate in acting on behalf of safety for organisations and in some cases for authorities that spend as little as two hours per month as quality monitors. These aviation consultants, together with their commitments, are not hard to find as they promote themselves world wide via the net.

One such consultant has indicated responsibility for as many as twenty Form 4 positions with many others in a similar situation, they are supposed to promote the Safety Culture within organisations, but how can they if they are not there? All organisations require a man-hour plan to show that management of personnel within the organisation is taking place to allow Human Factors to function and develop safely, but not it appears in these cases.

Furthermore, as consultants are not really active within the industry how up to date is their knowledge on specific organisational needs?

CHIRP Comment: The issue of some consultants who hold Form 4 (F4) approvals apparently over committing themselves was discussed with the CAA. The CAA advised that currently the Authority has no central register of F4 holders for control purposes; issuing approval by the Authority relies on networking by Regional Offices.

The CAA has reminded Accountable Managers of their responsibility for ensuring that any F4 holder contracted to them is able to discharge their responsibilities effectively.

Given that the current 'buyer beware' situation exists, the CAA has undertaken to consider whether any improvements are needed in relation to the issue of F4

authority. Whilst any changes would need to comply with EASA requirements, which permit the contracting-in of resources, a simple central register of F4 holders would readily identify cases such as that described in this report, which was not identified by the current arrangements.

In terms of Accountable Managers meeting their obligations, it would be relatively simple to introduce a contractual clause that requires consultants to declare the scope of any other F4 responsibilities that they hold; failure to do so would place them in breach of their contractual obligations.

CAA (SRG) AIRCOMS

The following CAA (SRG) ATS Airworthiness Communications (AIRCOMS) have been issued since 15 July 2010:

2010/09

Applying for the Approval of a Minor Modification to Non-EASA Aircraft

2010/10

Preservation of Flight Data Recordings (CVR & FDR)

2010/11

Guidance for Owners and Potential Owners of Light Sport Aircraft

2010/13

Restructure of CAA Airworthiness Organisation

2010/14

Radial Piston Engines - Avoidance of Damage Due to Hydraulic Lock

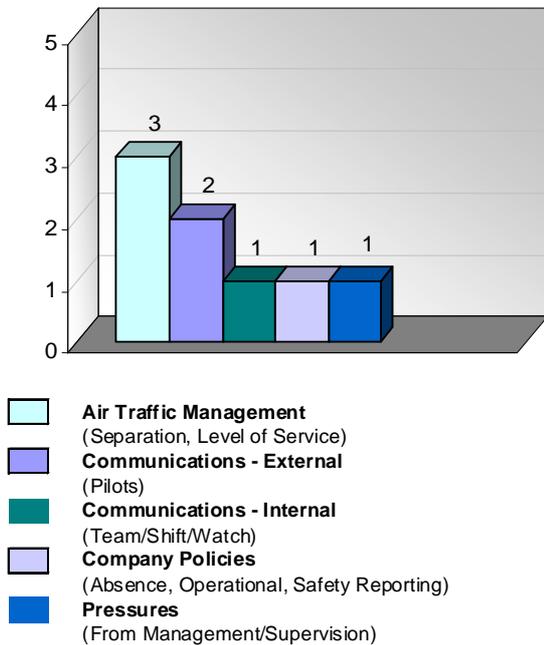
2010/15

Volcanic Ash

CAA (SRG) AIRCOMS are published on the CAA website (www.caa.co.uk). Any queries can be addressed to Airworthiness Strategy and Policy Department (requirements@caa.co.uk)

ATC REPORTS

Most Frequent ATC Issues Received 12 Months to September 2010



CONTAMINATED RUNWAY SURFACE - REPORTING

In 2001, 2002 and 2003, we received a number of reports similar to that below from both ATCOs and flight crew regarding the restriction on passing information on runway friction coefficients associated with some forms of contaminants to pilots due to the lack of accuracy of the measuring devices in wet snow/slush.

Report Text: Once again the season of snow and ice is with us and once again the situation regarding passing of braking action to pilots remains in my view unsatisfactory.

Mats Part 1 states that in conditions of slush or thin deposits of wet snow (thin deposit not defined) friction measuring devices can give inaccurate readings and no plain language estimates based on these figures shall be passed to pilots. What kind of inaccuracies the meter gives are also not defined.

It is my contention that, if a mu-meter is giving readings of say around .15 then it is pretty obvious that the braking action is poor even if the device is reading slightly inaccurately and I fail to see why this information cannot be used, coupled with the experience of the airport authority's reporting officer on the runway to at least pass to pilots that the braking action is estimated as poor.

How can it be in the interests of safety to simply say to the pilots "measurements of friction are unreliable in these conditions"?

I guess the pilots will find out when they put their wheels on the runway at 100kts!

CHIRP Comment: Since the introduction of the restriction on reporting runway braking, a number of UK operators and other organisations including the

Guild of Air Pilots and Air Navigators, BALPA and this programme have sought improvements in the reporting of runway conditions at UK airports, the technology associated with the measurement of runway surface friction and the correlation of runway braking action with aircraft performance.

Regrettably, progress has been slow; however, this issue was again highlighted during the prolonged spells of adverse weather experienced at UK airports last winter. The reasons for the ongoing difficulty and the agreement that has been reached following a series of joint CAA/industry meetings are detailed in the following comment from CAA (SRG) Aerodrome Standards Department:

All devices, not just the Douglas Mu meter are designed to run on a dry surface with an accurately controlled film of water sprayed onto the runway just ahead of the measuring wheel. This replicates the 3 zones of contact a tyre experiences on a wet runway. Under these scientifically proven conditions algorithms working on changes to the load cells on the wheel have been shown to produce a meaningful figure that equates to the surface friction characteristics of the tyre/surface interface. Note this does not read across to an aircraft tyre.

The figures are used to detect falling levels of grip and trigger maintenance intervention. Of the 3 friction machines accepted for use in the UK, these trigger level readings are different for the same measured level of grip and a correlation method has been devised to equalise the figures (See CAP683 Ch. 4 Table 3). It follows that when the conditions described in the above report exist the machines will not have in-tolerance data to work on - hence the unreliability. Unless a pilot is told which of the 3 machines has been used, and has CAP 683 table 3 and has an in-depth knowledge of the effect of contaminant fluid drag, it would be impossible to form an opinion. Most airframe manufacturers produce certified performance figures for dry and wet runways only; all others are advisory.

The CAA fully understands crew's desire to have as much information as possible, and agrees that a reading of .15 would indicate poor friction regardless. However, the same would not necessarily be the case if the reading was hovering between medium and poor. Therefore, the thrust of our advice to aerodromes this winter is to make full reports of all data in a timely manner to operators to help enable them to make safe decisions. Crews can expect, apart from the normal ATIS message, the percentage coverage, type and depth of contaminant split in to thirds of the runway i.e. Touch Down, Mid Point and Stop End.

In addition to reporting the type of contaminant, its depth and the percentage coverage at the touchdown, mid-point and stop-end of the runway in use, a new system of reporting runway conditions is planned to be trialled at a limited number of UK airports.

More details are published in FODCOM 27/2010, NOTAL 2010/09 and AT SIN No.187; all are available on the CAA website.

RUNWAY CROSSING

Report Text: Working an active runway with crossing traffic can sometimes get interesting. Flight Crews,

companies and passengers dislike delays so we try to be very efficient.

Some while ago, I instructed an aircraft taxiing for departure to cross the active landing runway with an inbound aircraft at around 4nm on final approach; Lots of room I thought; however, the taxiing aircraft proceeded to cross very slowly. I instructed the inbound to continue and to expect a late landing clearance, anticipating the crossing aircraft to pick up on this; however, this was not the case.

After clearing the runway, I asked, "Could you cross an ACTIVE runway more quickly next time?" The reply, "If you want us to cross quickly ask us to expedite then!"

In ATC we try to do our best to reduce delays; however, pilots need to play their part. You might be early on your slot or your cabin/figures might not be ready. But the other aircraft may just be tight on his slot or on final approach - just like you were on another day.

So just a thought for our flight crew colleagues:

Anticipate the next frequency when crossing and vacating

Crossing Active Runways

Rapid crossing

Improves safety, whilst

Maintaining a good look out

Expedite without being told. (It cuts down RT)

It's **A CRIME** to cross slowly!

SUPPLEMENTARY INSTRUCTIONS / ATSINS

The following CAA (SRG) ATS Standards Department ATSINS and Supplementary Instructions (SI) to CAP 493 MATS Part 1 have been issued since **15 July 2010**:

SUPPLEMENTARY INSTRUCTIONS:

None

ATSINS:

Number 163 (Issue 2)

Introduction of EU-OPS 1 regarding all Weather Operations

Number 185

Abbreviation and Mispronunciation of RTF Call Signs

Number 186

Mode S Interrogator Code Allocation Process and Timescales

Number 187

Winter Operations 2010/2011: Promulgation of Runway Surface Contamination Information to Flight Crews

Number 188

Temporary Controlled Airspace (CAS-T) - Reclassification as Class D

Number 189

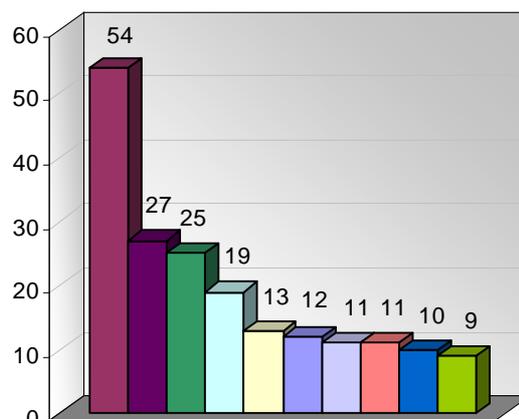
Volcanic Ash: Air Traffic Service Provision Considerations

CAA (SRG) ATS Information Notices are published on the CAA 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 September 2010



- Company Policies**
(Absence, Operational, Safety Reporting)
- Duty**
(Rosters/Rostering, Rest, Length, Crewing, Disruption)
- Communications - External**
(ATC, Regulators/Government)
- Communications - Internal**
(Team/Shift/Watch, Managers)
- Airports**
(Runways, Bird Control, Infrastructure)
- Security**
(Ground)
- Pressure**
(Commercial, From Management/Supervision, Time)
- Handling/Operation**
(Aircraft Handling by Crew, Operation of Equipment)
- Relationship Management**
(Planning, Managers)
- Air Traffic Management**
(Level of Service, Separation)

LONDON INFORMATION (FB95) - A COMMENT

Report Text: The last sentence of your comment on the use of London Information refers to the use of the word "Standby" (probably the most useful word in the whole of CAP 413) and allowing a reasonable time to elapse before chasing a reply.

I wonder if you would consider using your good offices to obtain guidance on what is a "reasonable time". It was not that long ago that I was flying IFR from Bournemouth to Exeter and on a radar to radar handover was told to standby - which I did. Silence reigned and when I was

almost on top of the Exeter NDB – maybe 20 minutes later - I thought I had better say something!

I think there is a recommendation that 30 seconds should be allowed for a station to return an R/T call. Perhaps a similar guideline on "Standby" of, say, 2 minutes would be useful?

CHIRP Comment: The 20-minute wait quoted in this report (which did not involve London Information) was probably excessive; however, it is difficult to quote a specific time as this will depend on the circumstances that pertain.

It is really a question of 'Airmanship'; for example, if the R/T frequency is extremely busy and the flight is proceeding as planned, a wait of 10 minutes might not be unreasonable. Conversely, if the frequency is relatively quiet or the pilot requires/wishes to impart specific information, checking after 5 minutes might be appropriate. It is also worth remembering that a controller might be engaged on another task, such as co-ordinating by telephone.

Finally, pilots also use the term 'Standby', often when dealing with an abnormal situation; this places the controller in a similar situation of assessing how long to wait.

ATC CLEARANCE LIMIT (FB 95) - A COMMENT

Report Text: As a Training Captain I would like to add some feedback to the article in Issue 95 - ATC Clearance limit.

I would commend the reporter for his open frankness and honesty. This can only lead to better awareness and enhanced safety.

It is most important not to assume that there will be NO HOLDING when the RT phrase "No delays expected" is used.

I draw your attention to AIC P045/2009. Section 3.1 states that when the phrase "No delays expected" is issued then "Do not anticipate being required to remain in a holding pattern any longer than 20 minutes...."

Essentially 'No delays' means holding not greater than 20 minutes.

When training both Captains and First Officers when it comes to the Approach Brief, I always point out that it is essential to establish and brief a clearance limit inbound.

With larger airports having various STARs (Standard Instrument Arrival), the normal final clearance limit will be a hold established over the waypoint fix of the designated arrival STAR. In the reported case the BIG 3B (attached), the clearance limit is the hold over BIG (Biggin Hill). I draw attention to the Warning box that states "Do not proceed beyond BIGGIN / WEALD without ATC clearance."

It is a fundamental point of IFR flying that if reaching the clearance limit holding facility and no onward clearance has been received from ATC then the aircraft must automatically take up the hold over the facility.

This was the case recently when inbound to Manchester via DAYNE. Due to very heavy RT we arrived at DAYNE but could not get a word in with ATC,

so commenced the hold entry, later to be given a radar vector.

At some smaller airports, e.g. Greek islands, there are no STARs and therefore not necessarily an obvious clearance limit. In these cases the clearance limit is going to be the approach facility (on the approach plate), being either a VOR or a NDB.

In all cases I emphasise during training the need to establish and brief on a clearance limit. If that point is reached without further ATC clearance then enter the HOLD.

For pilots of airlines or operators that do not put emphasis on this during an approach briefing, then I urge each pilot through their own airmanship to establish the clearance limit themselves and 'brief it'.

This comment is by no means any criticism of the reporter. I just want to add the above two points in the interests of flight safety and airmanship.

CHIRP Comment: In addition to the above comments, the following additional extracts from Aeronautical Information Circular AIC P045/2009 are particularly relevant:

Para. 3.2. ".....When delays are expected to be less than 20 mins controllers will when requested give a general indication of the expected delay.

Para 4. ".....even though 'No delay expected' will often mean precisely that crews should expect that on occasions some holding will be required before they are fitted into the final approach pattern."

LOW VISIBILITY PROCEDURES

Report Text: Manchester Airport has the R23R ILS NOTAMed as CAT 1 only. Recently, one assumes because of a 200 foot cloudbase, they were declaring LVPs (Low Visibility Procedures) in force. The visibility was not an issue.

A Cat 1 ILS is just that; anything else the airport might do is irrelevant. Declaring LVPs may well encourage people to bust minima. It may also confuse people, who are not familiar with MAN, that LVPs equals CAT 2/3 limits when in fact, for the approach they are about to fly, these limits will play no part in it.

It may well be that they are within the rules of declaring LVPs. However it does seem a very odd way to conduct CAT 1 operations. It is possible because of the ongoing issues with precision aids at MAN that they are attempting to complete some sort of quota for LVPs.

Lessons Learned: Given a CAT 1 ILS it would be interesting with a sub 200 foot cloudbase and LVPs being declared, how many people might find they 'get in'.

A recipe for a disaster.

This matter was raised with CAA (SRG) Air Traffic Standards and Aerodrome Standards Department. The relevant extract from the ATSD response was as follows:

In conditions of low cloud, the time available for the pilot of an approaching aircraft to assess the aerodrome environment visually is reduced. Consequently, aerodromes that wish to continue operating in poor

visibility or low cloud are required to develop procedures to safeguard the operation of arriving and departing aircraft during these conditions. These procedures are known as Low Visibility Procedures (LVPs) and are introduced in phases as the visibility/cloud base deteriorates.

Whilst ATC are responsible for advising pilots of the status of LVPs at an aerodrome, it is the responsibility of the aerodrome licence holder to ensure that all measures required to protect aircraft operations in poor weather conditions are in place before advising ATC that LVPs can be declared to be in force. LVPs are designed to protect both arriving and departing aircraft. Hence, the statement that "LVPs are in force" does not, in itself, imply any specific ILS categorization and relates instead to the range of measures that have been taken to secure the aerodrome for aircraft operations

However, aerodromes that support category 2 or 3 operations are also required to develop and maintain additional procedures to protect the signal produced by the ground-based radio navigation equipment e.g. the use of specific entry/exit routes to/from the runway, category 3 holds etc. At these aerodromes ATC should not declare that "LVPs are in force" until the appropriate safeguards for category 2 or 3 operations are in place.

Pilots of aircraft operating into Manchester would be expected to have briefed themselves on the status of the facilities there which, as the reporter rightly notes, includes the fact that the ILS at Manchester was NOTAMed as only being available for category 1 operations. The responsibility for ensuring that the weather minima for the type of approach proposed is acceptable rests with the commander of the aircraft.

Declaration that "LVPs are in force" at an aerodrome with a Category 1 ILS should not be taken as an invitation to attempt a landing when the weather is below Cat 1 minima.

CHIRP Comment: Notwithstanding the fact that a crew's pre-flight briefing would have included the NOTAM information that the ILS was downgraded to Cat 1, on being advised on arrival that LVPs (which are usually associated with visibilities below the Cat 1 limit) were in force, there is a risk that some crews might conclude, incorrectly, that the ILS status had been restored. This risk could be eliminated by a reminder of the degraded ILS status either being included in the ATIS broadcast or when advising arriving aircraft that LVPs were in force.

The report raises a wider issue about the use of a ground estimated cloudbase, as opposed to Runway Visual Range (RVR), as a determinant for the introduction of LVPs. The original intention of the runway safeguarding and increased spacing associated with LVPs was to protect the integrity of the ILS localiser/glidepath signals for aircraft conducting Cat 2/3 approaches from multipath interference from ground objects and preceding aircraft. The justification for the introduction of LVPs on the basis of the estimated cloudbase alone has been the subject of debate since unlike RVR, pilots are permitted legally to commence an approach with a reported cloudbase below Cat 1 limits and, providing the required visual

references are available at the relevant Cat 1 Decision Height, to carry out a visual landing; this can be often the case. In such conditions, it would seem to be more appropriate to take the necessary actions to safeguard the runway but delay the introduction of LVPs and the associated flow rate penalty from increased spacing until either the RVR approaches the Cat 1 limit or the required visual references are no longer available at the Cat 1 Decision Height.

LEARNING THE HARD WAY

Report Text: I was carrying out a second day of commercial helicopter pleasure flying at a well organised green field site with adequate ground-crew and facilities and flying an aircraft type that I am perfectly familiar with. I do not drink at all the evening before a flying duty and normally go out running during the evenings to avoid temptation.

A windsock was in place and winds were light and mostly down the landing site/slope. The fuel load was light (to increase the max. payload) but passenger numbers were low so an unusually high number of engine starts/shutdowns had been carried out. Also, I recall being slightly annoyed, since although an experienced instructor, I had found the aircraft difficult to take-off and land cross-slope smoothly. I had completed some 20 previous four-minute local flights uneventfully.

The passengers were being loaded by two competent ground crew members and I remember opening the throttle to the full-open position ready for take off. I looked out ahead, neutralised all the controls and said to myself, "Remember - two stage lift off, make it gentle and smooth into the hover." I lifted smoothly into the hover and noted the aircraft was slow to respond. All-of-a-sudden the aircraft lurched violently to the right and with considerable left cyclic action, I righted it, with a feeling of near-panic, realising that something had gone horribly wrong. I looked left and saw the rear left side door open and the ground crewman sitting on the grass slope. I then realised I had taken off with him still attending to the rear seat passenger's seat belt.

I moved away, landed, and he got up, came over and finished his task. I looked at him and apologised. He closed the door and I continued the pleasure flying. This was the end of the incident.

At the end of the day I apologised again and he shrugged his shoulders and very reasonably, said "not to worry". The next morning an incident report was submitted; later the Accountable Manager discussed the incident with me and whilst concluding that it did not require any further action, concluded that "obviously lapses of concentration must not happen". I agreed fully because I was wholly responsible for the incident with no blame accorded elsewhere

During the next few days, I analysed what causal factors had contributed to my error and what lessons could be learned:

1. Complacency: The task had been highly repetitious and I decided upon a solution and became over-focussed on it.

2. Tiredness/Stress: In addition to carrying out flying duties every other day for the previous eight days including training briefings/flights with a particularly difficult student, I had spent the other days either in the office or on associated work. In addition, I had been studying for an Examiner qualification; this had been disrupted as every time I had booked a day off for study a job came up at work. This was seriously worrying me, to the point of it making my life miserable because of the rapidly decreasing time available to complete my pre-course studies and the need to deliver an above average performance on the Examiner course, as would be expected of someone of my experience/position.
3. Weather: It was a hot day and the sun was always shining in my face during loading which is unpleasant. I do not wear sunglasses because they impair vision for landings.
4. Loading Procedure: The right-side loader very unusually chose not to walk forward and stand in front of the aircraft after closing the passenger door on that side, but walked off sideways out of my vision to talk to somebody while loading was completed. The strapping-in sequence was also unusual, since the left-side loader elected to secure the front seat passenger and door first not last, as the rear passenger was a child and the loader had considerable difficulty shortening his belt; this extended the ground-time well beyond normal. I became "standard event" biased and when I glanced left to check the front seat passenger he was secure and the door closed; however, I failed to check the loaders were both standing ahead to indicate that I was clear to take off.
5. Home time - less than one day in every week had been spent at home for several months. This is because it was near the end of a very busy summer season and my girlfriend lives a considerable distance away - some two hours drive, sometimes three with motorway works.

And the lessons:

1. Working more than five/six days continuously combined with studying and off-duty travelling can be very tiring. Don't overload yourself with too many career/achievement targets.
2. Multiple helicopter take-offs and landings are where the danger lies and require constant attention.

CHIRP Comment: The reporter is to be congratulated for this open, honest report on what could have been a serious incident and also the manager for the manner in which the reporter's lapse was subsequently dealt with.

Many of the contributory factors to this incident, tiredness, repetitive task, distraction and failure to follow SOPs are common to other serious incidents. It is precisely on such occasions that adhering to SOPs becomes vital.

UNCOMFORTABLE ABOUT COMFORT BREAKS

The following report was submitted by an off-duty flight crew member:

Report Text: As a passenger on a UK domestic flight I was disturbed to see the First Officer leave the flight deck to use the toilet during the climb. The flight departed approximately 30 minutes late and was scheduled to take 40 minutes. Surely a pilot can arrange toilet visits before take off/after landing on short flights with high workloads when climbing in the busy London TMA?

We went into the hold at our destination for about 35 minutes because of adverse weather before diverting to a nearby airfield. During our time in the hold the Captain left the flight deck to visit the toilet! It beggars belief that this is considered safe or acceptable other than in very extreme circumstances.

On the subsequent flight from the diversion airfield to our destination, which the Captain said would take 20 minutes and should be interesting as we would be flying at a relatively low altitude, the Captain again found it necessary to leave the flight deck to use the toilet!

When do these crews get time to do a brief and prepare for an approach? Or are they so complacent that these are no longer required?

CHIRP Comment: Many airlines operate a 'sterile flight deck' policy below 10,000ft in the climb and descent in which both pilots are required to monitor the ATC frequency and ATC instructions. Similarly, the CAA has stressed the importance of both flight crew members being present on the flight deck throughout the climb and descent to reduce a crew's vulnerability to a level bust event.

As the reporter notes, with a little forethought it should be possible on the vast majority of occasions to plan a comfort break to avoid the more safety critical phases of flight.

FLIGHT DECK ACCESS

Report Text: The company is currently leasing an aircraft including flight crew from another operator but uses predominantly company cabin crew. On most of the company fleet, which are the same type as the leased aircraft, a video system is fitted to enable the flight crew to check the flight deck door area is clear and positively identify the person requesting access before allowing access to the flight deck.

The leased aircraft does not have a video system fitted. The correct procedure to be followed without a video system is for persons requesting access to be positively identified by the flight crew. However, there have been reports of the other operator's flight crew unlocking the flight deck door without identifying the person requesting access - all that is required is a knock on the door and the door is opened.

There was a recent incident reported where a small boy going to the toilet knocked his elbow on the flight deck door and it was opened by the flight crew as a result.

CHIRP Comment: This is one of several reports received, which suggest that in some instances the

policy related to flight deck access is being less rigorously applied.

This case was referred to the company concerned. The company advised that an audit process was in place and, in response to similar internal reports, oversight of the leased operation had been increased.

OVERFLYING GLIDER SITES - A REMINDER

Report Text: I was on the ground at home when I observed an airliner lower than normal in Class G airspace, flying on an easterly heading inbound into a nearby airport. I checked on an aviation radar website to find that it was an ### (airline) flight passing 2,500ft in a descent. The aircraft had flown over a permanent glider site at between 2,500 and 3,000ft.

I find it surprising that commercial air transport airliners will fly this low in the open FIR when there are so many gliders and GA aircraft around. Both are difficult to see (and avoid) and gliders are also virtually invisible to radar.

CHIRP Comment: It is possible that if the aircraft was under a radar service its track/altitude had been coordinated by ATC.

Notwithstanding this, the UK Aprox Board has noted that overflights of gliding sites by civil commercial aircraft at or below the maximum winch height are not infrequent.

This report is as a reminder that a number of gliding sites in the UK, including the one quoted above, conduct winch-launching up to 3,000ft above airfield level and, if flying outside the Controlled Airspace route structure, crews should be in possession of the appropriate aeronautical charts/data.

FODCOM 10/2009 (1)

In April 2009 the CAA issued FODCOM 10/2009 in which a number of issues and clarifications related to the application of UK AOC Holders' Approved Flight Time Limitations (FTL) schemes were highlighted.

One of these involved the guidance for large companies of a minimum time of one hour for the completion of all pre-flight duties (Para. 3.6). Prior to the issue of the FODCOM, we had received a number of reports involving several UK operators, in which reporters had questioned the adequacy of the report times due to a change in circumstances. Following the publication of the further guidance on report times, we received comments from reporters on their experiences through the 2009 summer season and this year. The following are typical of the comments that we have received:

REPORT TIMES (1)

Report Text: I can tell you that unfortunately nothing has changed since submitting my previous report; indeed people are noticing it even more now that many pilots are on minimum rest in our busy (2010) summer season.

On the surface it appears that the company have done nothing to comply with FODCOM 10/2009.

(2)

Report Text: My concerns - highlighted by yet another management communication about crew arrival time at aircraft - are that our line crews simply do not have adequate time allocated to complete pre-flight duties (planning /preparations) to the standard expected and required.

Crew have to check-in on a computer, print off all their own paperwork, and review Crew Notices on-line before their consideration of fuel plan, route planning, wx, NOTAMS, Company notices, Sig Wx, passing of fuel figures, interactive crew briefing

Possible on a lovely straight forward CAVOK across Europe day, but imagine the demands last winter!!

Management require the following; a walk to the terminal, passage through landside to security, passage through airside to the ramp, and a further walk or (worse still) bus ride to their aircraft. We know at some bases there are additional local issues too. Crews are then met by a member of ground staff, with clipboard in hand, looking at their watch to record the Crew arrival time at the aircraft. If this is less than STD -35 mins expect a follow-up from management.

Combine this with Senior First Officers being promoted to the left seat for the summer schedule, and inexperienced First Officers in the RH seat; this mixture of low experience and often inadequate pre-flight preparation causes me (and a number of my colleagues) considerable concern.

As a consequence of the above, most crews feel the need to report well ahead of the official time, making something of a mockery of our Approved FTL scheme in our Operations Manual. This is especially true of the early morning departures on which the main focus of management attention lies.

For example, a four-sector roster with a 0600 report allows a 10hr 45min Maximum Flight Duty Period (FDP). In reality, to achieve arriving at the aircraft at STD - 35 mins, the crew are probably printing their flight plans by about 0550/0555 (max FDP - four sector roster - 9hrs:00min).

The company keeps telling everyone who will listen that "Safety is our number one priority" - sometimes one needs to back up fine words with fine actions:

Realistic report times perhaps?

Paperwork ready on report?

Change of emphasis from 'crew at aircraft' time?

Lessons Learned: Experienced Captains will always complete all required pre-flight preparation / duties, and go out to their aircraft when they are ready. Will this be the case with all our crews (many Command Courses running this next few months) - realistically, I fear not.

There is an increasing awareness that perhaps it's time for the relevant Authorities to review this situation before something happens - how about starting with the validity of the report times and implications on safe pre-flight preparation and FDPs?

CHIRP Comment: As noted in the second report above, one of the concerns about the adequacy of report times involves the processes by which crews obtain the

essential pre-flight paperwork. As an example, some operators prioritise NOTAM information; whereas others do not. In the latter case this can lead to crews printing/reviewing a large quantity of electronic information and being expected to absorb this in a very limited period of time.

The introduction of electronic information requires a specific EU-OPS permission based on an audit by the CAA. If you encounter subsequent problems with your company's processes, submit a company report. Remember, as the aircraft commander you are legally responsible for briefing yourself to the extent necessary to conduct the flight safely.

As in previous years, a summary of all FTL-related reports received this year is currently in preparation and will be submitted to the CAA in due course.

FODCOM 10/2009 (2)

A second clarification in FODCOM 10/2009 involved the use of commander's discretion (Para. 3.4), which included the comment; "However, rosters should never be planned in such a way that minor unforeseen events will automatically require the use of discretion."

(1) LEVEL 2 - USE OF DISCRETION

Report Text: I was originally rostered to operate a daytime return flight to/from a Middle East destination on a Level 2 (LVL2) Variation. (Maximum Flight Duty Period extended by 60 minutes)

The roster was changed to a late evening flight several days before and I was able to gain 4 hours sleep, at home, during the daylight hours before the duty.

The flight was rostered to within 10 minutes of LVL2 discretion.

Flight Crew: 11h15 + 01h00 = 12h15min.

On duty 2000h local. Off duty 0815h local.

Cabin Crew: 11h15 + 01h00 + 00h30 = 12h45min

On duty 1930h local. Off duty 0815h local.

Rostered arrival time 0805h local.

I was advised by company that there would be extended security arrangements for the aircraft turnround at the destination. I also noted that the previous time I had operated these sectors the block time was 05h35m as opposed to the company planned 05h20m.

On the day of operation we had a delayed departure by 15 minutes due slow boarding, and the predicted slow turnround at the destination. Our arrival at UK destination was 01h10 behind schedule (On blocks at 0915h local).

This meant that we operated 01h00 into LVL2 discretion. Discretion report submitted.

Lessons Learned: I believe that a roster such as this is detrimental to flight safety.

Fatigue is a major risk with this type of roster. Safety should come above all commercial pressures - even in this difficult economic climate for airlines. The use of the LVL 2 variation, I believe, is not being used by my employer in the spirit it was intended.

(2) ADEQUATE ROSTER CONTINGENCY?

Report Text: I had been rostered as part of a two pilot crew to fly from UK to a Caribbean destination. When I reported for duty it became apparent that a 25-minute delay had been posted. The First Officer had been made aware of this, I had not.

I contacted our crewing department to request that a third pilot be called from standby as, in my experience, this particular trip was always delayed by boarding issues.

I was advised that none was available and that it would take more than two hours to get one. I accepted this. Even if I had been advised of the delay the flight plan showed that we would operate to 4 minutes short of discretion. Interestingly, whilst in the cockpit running our pre-flight procedures a revised flight plan appeared. It showed a flight that was exactly 4 mins longer, thus immediately putting us on the threshold of discretion!

As it turned out, the expected boarding delay occurred in concert with a technical delay. Thus, we set off in discretion just as I knew we would when I got my roster several weeks prior!

According to the company, we are allowed to operate this leg with two pilots because we operate home from another Caribbean destination after positioning. All unacclimatised to local time.

The Caribbean - UK return flight has us 25 mins from discretion allowing for no delays. Delays prior to leaving the Caribbean are frequent and we would have little option other than to operate into discretion for the return sector as there is no standby cover in the Caribbean.

The whole practice seems, to me, unethical.

CHIRP Comment: It is difficult to conclude other than that the planning of the revised roster in the first report and the rostering associated with the second report was not in accordance with the guidance in the FODCOM.

These and other similar reports are indicative of a cultural issue involving 'Flight Duty Period creep' in which some operators appear to have accommodated new slightly longer routes into their schedules by adjusting sector/turnaround times. In some cases the result is that the rostered FDP is just within the normal maximum FDP and thus avoids the requirement to operate these routes under a Level 1/Level 2 Variation and the additional restrictions/rest provisions associated with these variations.

Such cases call into question the effectiveness of a company's Safety Management System and the role of the senior accountable operational managers who condone these practices.

SECURITY - STILL A PROBLEM

Report Text: Here are several security incidents:

1. UK Major Airport - August 2010

I put my bag, jacket and belt through the scanner. There was a beep as I went through the arch so shoes were removed as well. There was a wait for staff to do a body search due to the beep so I put my belt back on. I then had to remove it again for the search. Why did I have to

remove my belt a second time even though it had been through the scanner?

I then had a further wait to speak to the supervisor to explain the double belt procedure. He had no written instructions and explained it was a "Local" procedure. I was by now late for report and spent the first 10 mins in the crew room "cooling off". This is a major distraction to the safe conduct of flights. The flight departed late putting everyone else under pressure too. Why are we allowing stupid rules to threaten the safe operation of our industry?

2. UK Regional Airport - July 2010

In front of passengers I had to remove my jacket, shoes, belt, and laptop from bag. I then had to stand on one leg with the other one up high enough for the bottom of my socks to be examined. Why must I be humiliated in this way?

I have also had to do this balancing act at my base in front of my crew. Do you think in a critical situation my authority might have been undermined by the action of security?

3. UK Major Airport - Numerous Recent Occasions

There has been an increase the number of times shoes need to be removed from all crew. There is little room to put shoes etc back on and this has led to some pushing to get to the scanner belt. This is getting to the point where we will see scanner rage. There needs to be more space.

I have shoes that when looked at with the scanner have a metal strip in the sole. Could a metal strip hide anything? If so why is this type of shoe allowed?

If I beep going through the arch I have to remove my shoes and be searched. There seems to be an assumption that the shoes have made the beep because I am not asked to go through the arch again, is this correct? On some occasions I have gone back through the arch to add shoes to the scanner. The arch has then not beeped. So why am I then searched?

There seems no logic and I do not feel safe.

Lessons Learned:

Allow more for scanner equipment.

Send to every pilot a copy of the exact rules to be followed.

CHIRP Comment: The UK Government is currently conducting a review of the way in which aviation security policy is directed, managed and audited at UK airports. The results of the review are expected to be announced in the near future.

It is hoped that the review will consider how concerns raised by security staff and individuals who undergo security checks on a regular basis can be reported, assessed and, when necessary, addressed.

Until the results of the review are promulgated, it is important that security related incidents with potential safety implications continue to be reported, either directly to your company or, if you prefer, to this Programme or to BALPA if you are a member.

CAA (SRG) FODCOMS

The following CAA (SRG) FODCOMS have been issued since **15 July 2010**:

19/2010

Cabin Crew Fire and Smoke Training

20/2010

Aircraft Loading Errors and the Reporting of Related Occurrences

21/2010

Passengers Carried on the Flight Deck Sometimes Called 'Pilots Assistants'

22/2010

CAA Actions to Prevent Illegal Public Transport

23/2010

Submission of Operations Manuals to the CAA for Approval or Acceptance

24/2010

Cabin Crew Members Responsible for a Pair of Exits

25/2010

Oven Fires

26/2010

Use of Airstairs

27/2010

Winter Operations 2010/2011: Promulgation of Runway Surface Contamination Information to Crews

28/2010

Superseded

29/2010

Volcanic Ash: Revised Guidance for Contaminated Airspace

30/2010

The Carriage of Lithium Batteries as Cargo

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

CABIN CREW REPORTS

THAT TIME OF YEAR IS APPROACHING

Report Text: Our flight to a European destination was already an hour late when we boarded at our UK base. The flight crew met us on the jetty and said, "Let's just get there and get back". They had been hanging around to finish their day and appeared worried that the snow at both our destination and base would delay us further.

I was working at the rear and was getting in the cleaners' way so stepped off the plane via the rear door and very quickly noticed what to me seemed like a rather severe amount of ice on the horizontal stabiliser. It was on the leading edges, thick and covered the whole length of it. I notified the SCCM on the PA and requested that a pilot to come and inspect this.

The First Officer (F/O) returned from the walk around and was asked by the Captain to come and look at it.

The F/O came to the rear galley looking flustered and briefly looked out at the stabiliser. The F/O quickly dismissed the ice saying, "It is plus six degrees and it will melt before we get airborne" and walked off. Concerned with this I said I thought they should look at the other side but that was it.

It started to snow again outside for a few minutes, then stopped. It was also only three degrees outside according to the weather reports and the temperature I'd seen from my car, not "six degrees" as the First Officer had suggested. We departed after a short taxi.

It was not snowing on landing at our destination but the Captain did the walk around on this occasion and decided that we had picked up a lot of ice during the flight and requested de-icing.

My main concern here is the lack of attention being paid to a genuine and serious concern because of what seemed like an obsession not to get further delayed and just get home. I've very recently completed recurrent training and was refreshed on the company's clear wing policy, something that seemed to escape the flight crew on this day.

Lessons Learned: I think that perhaps at least the Commander should be the one to have looked at the stabiliser, not the pilot who had just completed the walk-around check and who would be very unlikely to want to have their check observations seemingly undermined by cabin crew.

CHIRP Comment: It is the aircraft commander's responsibility to ensure that the aircraft is clear of ice/snow before flight, except in those defined areas of the wing where the aircraft manufacturer permits frost to be present due to cold-soaked fuel.

Ice on the horizontal stabiliser can seriously affect the aircraft's stability particularly with flaps extended and has been the cause of a number of fatal accidents. No contaminant is permitted on the tail and flying control surfaces.

The reporter is to be congratulated for acting correctly on noticing the ice, which should have been removed before departure.

ANYTHING TO REPORT?

Due to publishing/distribution costs, we have not included report forms with this issue of FEEDBACK.

We still welcome reports. If you would like to submit a report to CHIRP, you can do so by the following means:

- Submit an electronic report via our secure website
- Download a report form from our website and post/fax it to us (see right for details)

www.chirp.co.uk

Or, you can e-mail us at: confidential@chirp.co.uk*

*CHIRP does not recommend the use of non-encrypted e-mail systems for submitting sensitive information

HAVE YOU MOVED?

If you receive FEEDBACK as a licensed pilot/ATCO/maintenance engineer please **notify Personnel Licensing at the CAA of your change of address and not CHIRP**. Please complete a change of address form which is available to download from the CAA website and fax/post to:

Civil Aviation Authority
Personnel Licensing Department
Licensing Operations
Aviation House
Gatwick Airport South
West Sussex RH6 0YR
Fax: 01293 573996

The Change of address form is available from: www.caa.co.uk/docs/175/srg_fcl_changeofaddress.pdf

Alternatively, you can e-mail your change of address to the following relevant department (**please remember to include your licence number**):

Flight Crew fclweb@caa.co.uk
ATCO/FISO ats.licensing@caa.co.uk
Maintenance Engineer eldweb@caa.co.uk

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