

CHIRP

Air Transport FEEDBACK

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EDITORIAL

Readers of FEEDBACK will be aware that CHIRP regularly receives reports regarding Absence Management Policies (AMPs) that are incompatible with pilots' licence obligations to fly only when fit to do so. We also receive similar reports from cabin crew, who are not licensed but are as vulnerable as flight crew to the physiological effects of minor ailments that do not affect the ability of non-flying staff to complete their duties. Despite this, many operators apply standard HR rules inflexibly rather than recognise the necessity of treating pilots and cabin crew differently from their ground staff. The implications of an inappropriate AMP are persuasively described in a report in this Edition of FEEDBACK entitled '[Absence Management Policy - Operating While Unfit](#)'.

Like many industries, the head office staff in most operators are pared to the minimum and it seems likely that operators may not have the capacity or expertise to develop and implement HR policies that are appropriate to their flying staff. Since operators surely do not wish to have flights operated by crew members who are unfit, they might welcome the opportunity to use an independently-developed AMP that would discourage inappropriate absences while accommodating the specialised needs of flying crew and be seen as fair to employers and employees alike. Nirvana?

It is very good news that the UK Flight Safety Committee will lead a project to develop best-practice protocols for absence management that operators can adopt or adapt. The work, which will have the support of the Department for Transport, will require input from industry, HR specialists, aviation medicine specialists, lawyers, flight crew and trade unions; it is hoped that AOC Holders will actively participate and share good practice where it already exists. The CAA will be asked to endorse the results, which will be made available to all operators. It is also good news that the first reaction from operators who have been contacted with a view to supporting this very important project has been positive.

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ENGINEERING EDITORIAL

Not so much an Editorial this edition – rather an advertisement. CHIRP is looking for an experienced Licensed Aircraft Engineer for the role of CHIRP Deputy Director (Engineering) (DD (Eng)). DD (Eng) provides the engineering knowledge and experience necessary to support the CHIRP Aviation Programmes. The

primary responsibility is the processing of reports submitted by engineers and ground handling staff from receipt to closure and possible publication in FEEDBACK. DD (Eng) also has a role in assessing all reports submitted to CHIRP in order to identify engineering factors and potential solutions.

The role requires up to a maximum of 1 day each week and is paid on an hourly basis. Much of the task can be carried out remotely with only occasional visits to the CHIRP office in Fleet, Hampshire. However, there is a minimum of 4 meetings to attend each year in the south east of England and ad hoc meetings in addition.

The role would ideally suit a recently retired engineer who has had broad experience (been there - done that) including management, is familiar with current regulations and can provide sympathetic, practical advice to reporters. DD (Eng) is also required to write articulately for inclusion in FEEDBACK.

If you are interested, please send a CV and covering letter to mail@chirp.co.uk. There is no closing date – we are looking for the right person.

Ian Dugmore – Chief Executive

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INFORMATION OVERLOAD

Report Text: Every day when I come to work I am presented with a thick pad of NOTAMs relating to the flight I am about to undertake. With a 1 hour report and a need to be on the aircraft about 30 minutes before departure, there is absolutely no way any pilot can sensibly read and assimilate the volume of data presented. Very often the information is 'coded' or in poor English making the task even harder. Almost without exception crews only read the NOTAMs related to Destination and alternates.

Within the on-board information (in the case of my company, LIDO documentation) - increasingly, airports are using the Airport Operational Information (AOI) pages of the airport plates to replicate NOTAMs or give the air traffic manual for the destination. For example, Malaga currently 19 pages and Barcelona 12 pages. There is absolutely no way a pilot can reasonably read and retain that volume of information and there is a great danger of something important being lost in 'noise'.

Obviously, a portion of the cruise is spent preparing for the arrival but with multi-sector days (or a diversion) it simply cannot be reasonable to expect anyone to absorb that volume of data.

There must be a better way to present the data and minimise the risk of confusion and data being missed? In discussion with colleagues, there is a strong feeling that the intent is to absolve authority of responsibility in the event of an issue arising because 'the information was there and you should have seen it'.

CHIRP Comment: The reporter highlights 2 related problems: the presentation of relevant NOTAMs and the amount of information placed in AOI pages of on-board documentation. There are a number of work strands seeking to address the issues including a survey conducted by the [Flight Service Bureau](#) – an airline cooperative – and Eurocontrol has been working for a number of years on a project called [Digital NOTAM](#). The CAA has also identified problems with NOTAM proliferation, relevance and presentation as risks to be investigated and mitigated by its International Group.

The presentation of NOTAM information is a global challenge and there are several reasons, for example Q-codes and their use, as to why managing and presenting them is problematic. There are several commercial applications which display NOTAMS graphically and, as long as they source the information from the approved provider, they can be used for flight planning purposes. There is also work going on at ICAO to address this issue, but this will be a longer term project. The CAA will be reviewing their requirements to provide a more user-friendly display of NOTAM information online and discussing these with NATS.

The AOI pages are consolidated AIP information which is generally provided from the AIP by the charting company; this can be tailored by the Operator but usually at cost. The counter challenge is how to make crews aware of AIP information in a simple manner – again this is a fine balance and if the airport creates a great deal of information then the crew are obliged to see it or have it available. This issue needs to be managed at operator level.

While the efforts to improve the NOTAM system are welcome – urgency is required. It is to be hoped that the nearly disastrous incident at San Francisco, when an aircraft narrowly avoided landing on a taxiway, may provide the impetus to make genuine and rapid progress. Inadequacies in the presentation of information

to the flight crew were identified in the NTSB investigation report (an abstract available by following this [link](#)) which included the following recommendation to the FAA:

Establish a group of human factors experts to review existing methods for presenting flight operations information to pilots, including flight releases and general aviation flight planning services (pre-flight) and aircraft communication addressing and reporting system messages and other in-flight information; create and publish guidance on best practices to organize, prioritize, and present this information in a manner that optimizes pilot review and retention of relevant information; and work with air carriers and service providers to implement solutions that are aligned with the guidance.

Unfortunately, with no early solution in sight, pilots must continue to work through the difficulties with the current NOTAM system and be meticulous in checking for relevant NOTAMS for every flight.

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ROSTERING SOFTWARE FDP VIOLATION

Report Text: The Senior Cabin Crew Member was called off an Airport Duty to operate a series of flights. Her early start time meant her maximum FDP was much lower than the rest of the crew who reported later. After questioning the length of the duty the crewing officer told the SCCM that she was within hours to do the duty.

During sector 4, I calculated that the SCCM was exceeding her maximum FDP by nearly 1 hour and that she shouldn't have been rostered all 4 sectors. On return to base, the roster system should have presented me with a discretion report to sign which it did not, showing that the crewing officer's information, when quizzed earlier, was consistent. I queried this with the crewing supervisor and suggested that they manually check the times. They then discovered the violation and amended the roster system in such a way that the violation was recorded and I (reluctantly) completed the discretion form.

I am very concerned that this may have been happening on a regular basis and the rostering software not only fails to detect it but that it is allowed to happen in the first place. It appears that when a crew member is called from Airport Duty, the FDP start for the rest of the crew is used instead of that crew member having their own start time. This is the second time that I know of when the wrong maximum FDP has been used, but in the first issue there was no question of exceeding the maximum FDP so although reported to crewing, was not investigated further.

Lessons Learned - I have learnt not to trust the crewing computers to have the correct information about flight time limitations, and always do my own calculations.

CHIRP Comment: Computerised rostering systems are in widespread use and are essential for larger operators. However, any system requiring a manual input is vulnerable to human error. The operator has advised that when a crew member is allocated a flight from duty at the airport it is necessary for a crewing officer to make a manual input into the rostering system in order that it calculates the maximum allowable FDP; all the Operator's crewing officers have been reminded about this requirement.

Although it is the Commander's responsibility to ensure that crewmembers operate within the relevant FTL, Commanders may not be in possession of all the relevant information; they need to rely on crewing staff to ensure compliance with the regulations. Cabin crew should be proactive in assisting Commanders to meet their responsibilities when they know or suspect they have a different start time, or are in different state of acclimatisation, to other members of the crew – already an SOP for some operators.

This report will be added to the agenda for the next CHIRP Cabin Crew Advisory Board meeting to make this point in Cabin Crew FEEDBACK.

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AIRPORT SECURITY STAFF

Report Text: When passing through the staff security checkpoint [as Flight Crew] at [] Airport, I was told very abruptly that I could not take a 120ml bottle of contact lens solutions with me. I told them that I was entitled to carry these lens solutions, as I was required to wear contact lens as required by my medical certificate. I have encountered this situation at several UK airports in the past, and also at [the subject

airport]. I have not encountered this problem at European Airports. The contact lens solutions are only manufactured in 120ml bottles.

Despite several attempts to state that that this was allowable, the security staff member was very abrupt and arrogant. There was not any offer from him to confirm the situation or try and find out what was allowable from a supervisor. This was very upsetting and distracting, as we were due to operate a flight.

I had to ask for a manager, who also stated that I was only allowed a 100ml bottle of medical liquid. Both staff members would not accept that I was allowed to carry it, despite being shown our manual reference, which is approved by the CAA.

I then telephoned our Flight Crew Duty Manager, who spoke to the security manager, who stated to our manager that there was some confusion, and that only a liquids test was required. This was untrue. This was never stated until this moment. He also stated to me that it was his 'discretion' as to whether liquids more than 100ml could be carried through security. I was under the impression that there was no discretion, and that the rules were laid down by the CAA. This also needs clarification!

I also asked for the original security members name for my report, but he refused to give it, and walked away. I moved closer to try and see his name badge, but he then moved further away from me, behind the security benches. I asked for his name again for my report, but his female colleague then told him to turn his badge around so that I could not get his name! At this point, we had been there approximately 20 minutes, and I was very frustrated and annoyed.

I was only operating one sector back to [UK base], but would probably not have operated a further sector as I was very distracted when driving home and had trouble concentrating, and was still annoyed over the whole incident when I arrived home. This just goes to show how a lack of concentration after something like this can affect flight safety.

If my lens solutions had been confiscated, I would have had to come off any further flight, as lens solutions are something that I need to carry with me.

As mentioned previously, it was one issue with the security staff not knowing the rules, but another with their attitude, lack of consideration and lack of professionalism. There is no obvious consideration of the job we are carrying out and the effect on flight safety.

Lessons Learned - Retraining of security staff so they know the regulations, and retraining in how to deal with people. Instruction in the job of Flight Crew so that they realise how their behaviour directly affects flight safety.

CHIRP Comment: The airport operator's response to this report was rapid and excellent. It confirmed that the reporter was permitted to bring contact lens solution through up to 150ml providing that it is accompanied by a CAA Medical Certificate. This is not a matter of 'discretion' but rather governed by regulations. The staff involved have been spoken to and re-briefed on the regulation. The airport operator also expressed concern at the comment that that the Security Officer appeared 'rude and arrogant'; this is counter to the operator's aim of providing great Customer Service to all airport users. Apologies were offered to, and accepted by, the reporter.

Note: permission to carry on up to 150ml of lens solution does not apply if flight crew are travelling as passengers. Also, lens solution is available on-line and on the high street in quantities of 100ml and less.

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SYSTEMATIC CONTRAVENTION OF FTLs

Report Text: In recent months my airline has adopted the rostering practice of reducing the rest time at base between Westward bound rotations followed by Eastward bound rotations from the required 3 local nights, as stated in our FTL scheme, to, in my case, a 45 hour 27 minute rest period between [UK-US Midwest-UK] and [UK - Far East - UK] flights that only included 2 local nights. The company's argument is that by providing us with hotel accommodation at home base the 2 elements of the Westbound and Eastbound trips count as one rotation and so the FTL scheme stipulations for Eastward-Westward and Westward-Eastward transitions do not apply, the minimum rest period, in their interpretation, being the greater of 14 hours or the length of the preceding duty. Despite the incredulity of believing that the restorative benefits of 3 local nights at home can be compensated by as little as 14 hours in company

provided accommodation, this has now become standard rostering practice and is being habitually employed.

Senior management from the DFO down are well aware through a number of fatigue reports, including my own, of the unease that this practise is causing but seem oblivious to the erosion in morale (evidenced by a high sickness rate) and trust in management that are natural consequences when the controlling mind of an organisation sees fit to flaunt guidelines explicitly set down to protect crews from fatigue and so ensure a safe operation.

CHIRP Comment: EASA regulations are complicated in this area. It is understood that the intention in the regulations at CS FTL.1.235 (b) (3) (ii) (a minimum rest period of 14 hours at home base) is to allow an immediate back to back trip in the same direction as the first trip in that rotation. It was also intended for occasional use. The additional requirements for rest to manage Eastward-Westward / Westward-Eastward rotations in CS FTL.1.235 (b) (4) are a separate requirements which cannot be reduced. Operators are required in CS FTL.1.235 (b)(5), to monitor rotations, especially rotations in opposite directions, in terms of their impact on crew members' circadian rhythms and fatigue and must provide sufficient rest to crew members between such rotations, irrespective of where the transition occurs - at home base or away from home base.

The CAA will follow up this report with the operator and, when it next updates its Q&A, the Authority will include this question to ensure all operators understand their responsibilities.

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USE OF COMMANDER'S DISCRETION

Report Text: As I understand it, Commander's Discretion is to be used to enable the completion of a flight duty due to unforeseen circumstances. There seems to be a grey area around departing from a home base, where it is known the discretion would need to be used on the final sector back to base to complete the duty. For example flying a four sector day, and a delay arriving back in home base on sector 2 would mean that sector 4 would require discretion to be used. It could be argued that crew, faced with the choice of either an overnight at an outstation, or positioning as pax after a relief crew had been dispatched to the outstation could be swayed into accepting operating in discretion regardless of fatigue level, to 'get home quicker'.

My company define 'unforeseen circumstances' as those occurring after check-in, however I would argue that if it became evident during the duty that discretion will be required later, and opportunity arises for a new crew to be called in with no impact to the operation that this should be the default position?

CHIRP Comment: The operator's definition of unforeseen circumstances is compliant with EASA regulations: ORO.FTL.205 f (1) refers to the conditions under which Commander's Discretion may be used, "unforeseen circumstances, which start at or after the reporting time, ..."

However, AMC1 ORO.FTL.205 (f) (a) includes,

"The exercise of Commander's Discretion should be considered exceptional and should be avoided at home base and/or company hubs where standby or reserve crew members should be available."

Although the EASA FTL AMC refers to the use of discretion being "exceptional", regrettably there is no specific guidance on what exceptional means. EASA has published a [Q&A document](#) that includes the following text:

Commander's Discretion may be used to modify the limits on the maximum daily FDP (basic or with extension due to in-flight rest), duty and rest periods in the case of unforeseen circumstances in flight operations beyond the operator's control, which start at or after the reporting time.

Considering the ICAO definition of 'unexpected conditions', unforeseen circumstances in flight operations for the purpose of ORO.FTL.205 (f) are events that could not reasonably have been predicted and accommodated, such as adverse weather, equipment malfunction or air traffic delay, which may result in necessary on-the-day operational adjustments.

Commanders cannot be expected to exercise discretion without an understanding of the events that constitute unforeseen circumstances. It is therefore necessary that they receive appropriate training

on the use of Commander's Discretion along with how to recognize the symptoms of fatigue and to evaluate the risks associated with their own mental and physical state and that of the whole crew.

Operators should ensure that sufficient margins are included in schedule design so that Commanders are not expected to exercise discretion as a matter of routine.

In practice, the controls on the use of discretion are the operator's appetite for disruption when discretion is declined and the NAA's tolerance of how frequently discretion is used. Operators that launch crews from home base when the use of discretion will be required to complete the rostered return leg rely on the safety net provided by the Commander's authority to decline the use of discretion. Commanders must retain this authority but there is undoubtedly pressure associated with the decision with its potential for disruption to passengers, the crew and the operator. Modern airline operations with reliable communications to ops controllers may require Commanders to make fewer independent decisions of this nature than hitherto and decisions over discretion may take on extra significance. Although there may be exceptions, the majority of Commanders are conscientious 'can-do' professionals who will default to using discretion unless there are safety concerns associated with doing so.

The CAA supports EASA's view and also the use of Commander's Discretion from home base. While the AMC highlights that use of Commanders Discretion from home base should be exceptional, it is permitted at any stage of the FDP. The CAA monitors the use of discretion as a core regulatory activity.

The bottom line is that only the aircraft Commander is empowered to make the decision about the use of discretion, in accordance with the requirements, AMC and guidance material.

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USE OF CONTROLLER PILOT DATA LINK COMMUNICATIONS (CPDLC)

Report Text: I am a keen user of CPDLC. Many of my colleagues are not. This is because the system has too many failures to be trusted by many controllers and that coupled with reluctance of pilots to actually log in early enough, or at all, in their flight means that lots of controllers don't want to alter their technique to make full use of it. It needs to be realised that to make full use of this technology controllers do need to alter the way they work, so they are either all in or use it infrequently.

Controllers have periods of incredibly high RT load and CPDLC is excellent at relieving this. It isn't always as simple as splitting a sector to control RT load due shortage of staff and complications in traffic handling caused by splitting.

I urge pilots to log in as much as possible and as early as possible in their flight. We need to make this a high usage piece of equipment. This will require pilots to have better understand of the system, especially those in B767/757/747 which due to their age do not show route clearances as clearly as they might. These pilots need a little extra training.

I have already spoken to my senior management about spending money on making this system better. System experts already know what is needed but do not get the go ahead due lack of money to spend on system updates.

It is also necessary to make the carriage of this equipment compulsory as soon as possible. Controllers need the Aeronautical Telecommunications Network (ATN) version of this as it is better than Future Air Navigation System (FANS) which is generally much slower and more restrictive than ATN. Airlines ordering new aircraft need to make sure that the equipment is fitted and pilots trained fully.

This system will help everyone, pilots included, it will increase sector capacity, reduce errors on read backs (as there are none) making it safer and make the RT quieter. This in turn allows the controller more thinking time to work out how to give continuous climbs and descent therefore saving fuel.

CHIRP Comment: CPDLC is excellent over the N Atlantic but its use in Europe is patchy. Information about its use in Europe can be found on the Eurocontrol [website](#). Its potential to reduce reliance on voice communications is recognised but it will only be realised if aircraft are suitably equipped, pilots log on and controllers use it. Currently not all aircraft are compatible with both FANS and ATN. From a controller perspective it is the Human-Machine-Interface (HMI) that is critical to exploiting CPDLC. Area controllers with support controllers to input instructions are better able to use CPDLC than TMA controllers without support and where the number and timing of instructions become prohibitive. Developing the HMI, possibly to include the facility for controllers to input their instructions using speech recognition à la Siri and Alexa, is the key to

fully exploiting the system. Notwithstanding this, pilots are encouraged to log-on whenever possible and to reply promptly to all data link messages. It is important always to 'Accept' the up-link instructions.

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UNSAFE OPERATING PROCEDURES

Report Text: My employer limits inexperienced pilots on single-aisle Airbus to Flap Full landings until they have completed approximately 6 months of line flying. On the Airbus A321 During initial line training [inexperienced pilots] can conduct take-offs and landings on A321 but after completion of their initial line check they may not conduct take-offs or landings on A321 aircraft for the first 6 months or so of line flying. With particular reference to the A321 restriction but equally the flap full limitation on the A319/320, pilots are being allowed to operate as part of the minimum crew complement whilst being deemed unsafe to actually land the aircraft. If I, as Commander, should become incapacitated, it is up to the other crew member to deal with the situation. This would obviously include landing the aircraft.

I have been concerned, since the introduction of this operating limit, that the training department is allowing crew onto the line without the required competency or confidence to fully operate the aircraft. Passing the final line check onto type should surely mean that the crew member is safe and able to take-off and land the aircraft.

Whilst I fully understand the steep learning curve of a newly qualified pilot fresh out of training and released to the line, it is concerning that the minimum standard expected does not include the ability to take-off and land the aircraft once out of training.

Operator Comment: The operator commented that its policy is common with other UK operators and was only brought in after discussion with other airlines. There were a series of issues with new pilots struggling with alternative Flap settings on all single aisle Airbus aircraft and with landing the A321 regardless of Flap setting. It was decided to give some opportunity for consolidation of the standard landing technique by ensuring consistency of 'the picture' outside the window for a period of around 6 months. Following this, variability is introduced during line continuation training with a trainer who will have additional training in intervention and considerably more experience than the average line Captain in exercising intervention skills and in delivering teaching techniques.

In the unlikely event of an incapacitation on an A319/A320 then the co-pilot can perform a full flap landing and in an A321 the normal A320 landing technique will provide a perfectly safe landing, the difference in technique is not that significant. This policy is designed wholly on the basis of delivering support to new pilots as a consequence of feedback from them and our [the operator's] own observations of their performance. So far it has been very successful.

CHIRP Comment: The CAA is content with the operator's policy which serves the purpose of minimising the risks of a potential tail strike until inexperienced FOs can consolidate their landings in the first 6 months of flying.

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ABSENCE MANAGEMENT POLICY – OPERATING WHILE UNFIT

Report Text: I would like to report a concerning trend at my company - a hardening approach of the "absence management", or sickness policy. As far as I am aware this has always been in place however our flight ops management have up until now applied a soft touch to flight crew, accepting that our operational role and responsibilities as a license holder restricts our ability to work in a unique way. Unfortunately over the last few years this approach has changed and more of our community are finding ourselves being "managed" under this process. This obviously does contradict our just safety culture, which up until now, I considered fairly robust.

I recently reported for work suffering from a cold / virus, and knowingly so. I am currently in the first stage of the company's absence management process, and any further sickness in a 12 month period would result in a formal interview with a Flight Ops manager.

On the day in question I was at best 50/50; however the Absence Management Policy (AMP) weighed heavily on my mind. I often find that I deliberate at length before reporting unfit for work - something that my wife cannot understand (she can see I am clearly unfit but watches me analyse my wellbeing before reluctantly

admitting that I am not fit to work). I have never taken this decision lightly and often feel a tinge of guilt - many of my colleagues mention that they feel the same, - as a community we commonly try to press on and get the job done.

Before reporting for this trip, I found myself looking through my logbook, adding up the days since I was last unwell, not wishing to enter the next stage of AMP. On reflection the fact that I was doing this and had allowed it to cloud my professional judgement is quite concerning and should have flagged to me that something was up at the time.

I didn't feel great during the outbound sector however this only became a problem during the descent. [] is one of the most challenging destinations we operate to with a number of threats requiring thorough briefing and high levels of SA and monitoring throughout the descent and approach.

I was the heavy, or relief pilot on this sector. Sat on the jump seat during the descent I began to sweat, then shiver and was fighting the urge to sleep. My SA was barely at the notice level - I was of very little use to the operating crew and if anything my lack of capacity, concentration levels and general wellbeing became a distraction to the pilots in front of me. Clearly I was not fit to operate safely and had not been all day.

We arrived at the crew hotel where I slept for 24 hours and barely left my room over the next 4 days. Fortunately I had recovered sufficiently to operate home safely and did so, however feeling like I had let my other crew members, and most importantly myself down on the outbound sector.

Reflecting on my experience - should I have operated? No, clearly not.

Did my being in the AMP affect my ability to make a safety decision on my fitness? Yes, most definitely. Have I made an error of judgement like this before in my 15 years of commercial aviation? No, as I mentioned it is never an easy decision to make but one I have always sensibly made before.

What could I do differently next time? - Clearly I had let myself be distracted when assessing my fitness prior to operating. Should I become unwell in the future I will remember this experience, put safety first and deal with the personal consequences later.

CHIRP Comment: We are grateful to this reporter sharing experiences with which many pilots will empathise. Assessing one's own fitness to fly can be easy in some circumstances but difficult when it's marginal. Professional pilots, who are anyway reluctant to 'go sick', don't need the additional threat of disciplinary consequences clouding their judgment when making subjective decisions. The report provides further evidence for the necessity of the work on a generic AMP referred to in the Editorial.

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CALLED TO PREPARE AN AIRCRAFT BUT NOT OPERATE

Report Text: I was on an Airport Duty in the crew room. ([This operator] allocates a duty for crew to be on immediate readiness at the airport).

The crew dispatch officers came into the standby room and requested that a pilot (me) and 4 cabin crew proceed to a spare aircraft on the airfield, conduct safety checks and pre-flight preparations, and board passengers in advance of a flight to [XXX] that we would not operate. The scenario was that a XXX-based aircraft was inbound with a technical problem, and that in order to avoid delay and preserve on time performance, we would prep their new aircraft and board their passengers in anticipation of their arrival from their now AOG aircraft.

I immediately had a number of concerns with this, which included:

1. Should the crew not be allocated an hour's full briefing/prep time as required by the authority?
2. If the 'aircraft prep' was not being allocated to the roster (it never appeared as a separate item), would it be considered FDP or just duty period?
3. The company did not appear to be keeping a record of which crew members it was using for this unusual duty
4. Who was the legal commander of the flight to be conducted? In my mind this was me until such time that the XXX Commander relieved me, however I was being expected to oversee a security search and take a number of safety critical decisions on behalf of a Captain I had no contact with.
5. What provision did the operator's Ops Manual have regarding this? The Ops Manual states that one non-operating member of cabin crew may 'stand in' for an operating member during boarding until such time as the operating member arrives, but makes no mention of a whole crew doing so. There

used to be a provision that a flight may be boarded only if the operating senior cabin crew member is present, but this appears to have been rescinded.

After a discussion with the member of pilot management present, his view was that this procedure was not explicitly outwith the Ops Manual, and that we should proceed to the aircraft and prep it as instructed. I reluctantly complied.

We proceeded out to the aircraft and I reviewed the tech log and completed a walk around whilst the crew began their security search. The aircraft had a number of issues which I wanted dealing with before the passengers were boarded - the passengers were being held on a bus outside the aircraft. There was an outstanding tech defect which required engineering input. De-icing was indicated so I called for it (although it was not conducted whilst I was the Commander). I had been given the first page only of the outbound flight plan to take a fuel decision on, so loaded some extra as a precaution.

After confirmation that the cabin crew were as briefed as they could be and had completed a standard security search, we boarded the passengers. As the last passengers arrived so did the operating XXX crew - I gave the operating pilots as full a handover as I could, and the 4 cabin crew and I proceeded back to the crew room to continue our airport duty.

On return to the crew room, I reiterated my safety concerns, in particular regarding the issue of who was legally responsible for the different aspects of the flight. The base manager was happy with the procedure as conducted because the overriding principle of delegated responsibility applied.

I have since been on a further airport duty and have had the same thing happen - crew dispatch coming round the crew room asking for airport duty crew to 'prep' an aircraft. It seems that this practice is now firmly established as standard procedure at this base.

I believe that there are too many grey areas with a procedure like this for me to be happy to conduct it again. I would be very interested to know CHIRP and the CAA's views on this practice.

CHIRP Comment: Using a crew on airport duty to prepare an aircraft for another crew to fly is an entirely reasonable use of the Operator's available resources and the reporter had clearly been thoroughly professional in complying with the task. However, there are some grey areas. For example, a crew preparing an aircraft may not require the full standard 'report to departure time allowance' but there should be some prior consideration about how much time is necessary. Also, fuel decisions are personal choices and a potential area for concern. That said, it seems likely that most Commanders would err on the side of caution if preparing an aircraft for another crew, who could in any case load more fuel before departure if required.

It would be helpful and good practice if guidance about preparing an aircraft for another crew were published in company ops manuals. This should include the requirement for an audit trail of who had been tasked with the duty, if and when signatures were required to effect the handover and the point at which legal responsibility was transferred. It is also essential to ensure that crews that take over prepped aircraft do not feel under pressure to expedite their departure to the extent that they are rushed.

The reported Operator has agreed to review this subject with the intention of adding an appropriate level of detail in a future amendment to its Ops Manual.

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