

STATEMENT OF ANTHONY J. BRODERICK, ASSOCIATE ADMINISTRATOR FOR AVIATION STANDARDS, BEFORE THE SENATE COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION, SUBCOMMITTEE ON AVIATION, CONCERNING COMMUTER AIRLINES. NOVEMBER 5, 1985.

Madam Chairman and Members of the Subcommittee:

I appreciate the opportunity to appear before the Subcommittee today to discuss commuter airline safety with you. In my view, the evolution of the commuter airline industry is truly one of the success stories in American aviation. Before discussing that point in greater detail, though, I would like to set out what it is the FAA defines as a commuter air carrier. We consider a commuter air carrier to be an operator who conducts scheduled passenger carrying operations of at least five round trips per week between two or more points, using aircraft with a maximum seating capacity of 30 seats or less and possessing a maximum payload capacity of 7,500 pounds or less.

In the matter of a few short years, the commuter airlines have made great strides in safely meeting the demands placed on them as a key element of our air transportation system. This year, in terms of the general accident rate, the commuters are experiencing the safest year in their history. Preliminary data indicate that, through the end of September, the commuters experienced 15 accidents. Commuter flight data indicate that this is an accident rate of 1.14 accidents per 100,000 flight

hours. That contrasts with a rate in 1978 of 4.68 accidents per 100,000 hours flown. Since the Airline Deregulation Act, the trend in accident rates for commuters has been steadily downward. I think it also important to note that these improvements occurred over a time in which the industry experienced substantial turnover in terms of new entrants and significant growth both in hours flown and passengers carried. Today, commuters serve nearly 600 cities, which is roughly a 27% increase over cities served before 1978, and, from 1977 through 1984, commuter passenger enplanements grew about 16%. Each day there are an estimated 7,200 to 7,500 flights with approximately 83,000 enplanements.

I believe the significant improvements in commuter safety are primarily attributable to two key factors. The first involves the regulatory environment in which the commuters operate. Let me put that in perspective. Before the advent of airline economic deregulation, the safety standards governing commuter airlines, contained in Part 135 of the Federal Aviation Regulations, varied in substantial respects from the Part 121 regulations governing the large airlines. Recognizing, however, that in a deregulated environment there would be substantially greater reliance on commuter travel by the travelling public, the FAA determined that a significant upgrading in the safety regulations for commuters was necessary. Those upgraded requirements, promulgated in 1978, brought the commuter requirements much more into line with the overall safety requirements for Part 121 operators.

As an adjunct to that effort to increase the safety regulations for commuters, each commuter operator was "recertified" by the FAA to assure that it complied in all respects with the upgraded safety requirements. That was a massive undertaking by the agency, but one that was necessary to assure that this key segment of the industry was, in fact, delivering the high level of safety which the travelling public expects and deserves.

In addition to the FAA's effort to improve the regulatory environment in which the commuters operated, another key factor came into play in terms of fostering substantially improved safety levels. That involved the general attitude of the industry itself. Administrator Engen often indicates that safety is a shared responsibility. The approach taken by the commuter industry towards shouldering its safety responsibilities makes that point well. Over time, representatives of the commuter industry have worked closely with us to foster a safer environment. Early on there seemed to be a self-recognition that, for this segment of industry to meet public expectations, there was a need for a cooperative relationship between the industry and the FAA to promote safe practices. They have also worked within the industry on a variety of educational programs designed to improve safety practices. Oftentimes, we have had the support of the industry as we have pressed for more stringent safety requirements. Moreover, many operators have sought out our help and welcomed the opportunity to work with us on areas of shared concern.

Certainly, there have been instances where enforcement actions have been necessary against individual operators for safety violations. And, where necessary, we have taken significant actions against operators who have evidenced a disregard for safety. But, on balance, we have found the industry overall to be receptive to safety improvements, and their general safety record reflects that positive disposition.

Clearly, as long as there are any accidents, we cannot be content with the safety record we have achieved. Therefore, our efforts to oversee the industry will continue with a view towards making whatever further changes will improve safety. With that in mind, one area in which we are taking a hard look--and which I know is of significant interest to the commuters--involves the integration of simulators/training devices into commuter training and flight checking programs. We have recently completed an exhaustive analysis of this area, and are working with the commuter industry now to expedite the greater use of these devices among the commuters. At this point, our efforts are directed toward aircraft of 30 seats or less, but will subsequently be expanded to larger aircraft. We believe that the use of simulators/training devices can go far towards increasing the skill levels of pilots, and in a way that is cost-effective for industry. For example, pilots can perform emergency maneuvers in simulators/training devices that would be far too risky to practice in actual aircraft. And they can do so more cheaply in this equipment than in an aircraft. By

improving the quality of training, simulators/training devices may prove useful in bolstering the skills of less experienced pilots. Given the current cost of flight time, we may see fewer and lower-flight time pilots available for airline hiring in the future. If this turns out to be the case, the availability of simulators/training devices may be an important factor in helping to balance the relatively lower pilot experience levels.

In closing, Madam Chairman, I would again like to express my conviction that the overall industry approach toward shouldering its safety burdens in a responsible manner and toward working cooperatively with the FAA to advance the safety of the industry has been a key contributor to the substantial improvements we have seen in commuter safety. You may be assured that we will continue working closely with the commuters to identify additional safety improvements that may be feasible.

That completes my prepared statement. I would be pleased to respond to questions you may have at this time.