

STATEMENT OF ANTHONY J. BRODERICK, ASSOCIATE ADMINISTRATOR FOR  
REGULATION AND CERTIFICATION, FEDERAL AVIATION ADMINISTRATION,  
BEFORE THE HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,  
SUBCOMMITTEE ON AVIATION, CONCERNING COMMUTER AIRLINE SAFETY.  
MARCH 17, 1992.

Mr. Chairman and Members of the Subcommittee:

I welcome the opportunity to appear before the Subcommittee today to discuss commuter airline safety. Given the safety record of the commuter airlines in 1991, I appreciate and share your interest in this important subject.

Four years ago, we appeared before this Subcommittee to discuss in detail with you the safety of the commuter air carriers and the steps we were taking to press for continued safety improvements. The importance of that topic has not diminished, since this key segment of the air transportation industry today carries almost four times as many passengers as it did in 1978. When we appeared before you, we told you about the National Aviation Safety Inspection Program (NASIP) we had underway at the time, to take a hard look industry-wide to see where improvements could be made.

The NASIP told us there were some significant deficiencies that we and the industry needed to address together. The largest number of findings were associated with a lack of management knowledge

of, and experience with, our comprehensive commuter air carrier regulations, which govern the safety programs and practices of the commuters. To address those deficiencies, our principal inspectors visited all Part 135 air carriers to share the results of the inspection. We worked closely with the operators to put into place the necessary corrective actions and improvements, and to oversee the implementation of those corrective measures.

Since that time, as we have described in recent testimony before the Subcommittee, we have continued to beef up our inspection and surveillance programs to ensure that improvements continue to be made. The nationally-managed inspection program of today, with its more clearly defined objectives, goals, and policy guidance, along with our expanded workforce, has provided us with substantial additional capabilities.

During that major "check up" of the commuter air carrier industry in 1988, this Subcommittee and the FAA agreed that, although very significant progress had been made, we could do more to maintain the high level of safety and public confidence in commuter air travel. We went back to take a hard look at our regulations governing commuter operations to determine whether any changes needed to be made. We did, in fact, pinpoint some areas for improvement, and, since September, 1988, we have put a total of 9 rulemakings into place which affect commuter air carriers. I'd like to briefly outline for the Subcommittee some of these efforts.

In October 1988, we put into place new flight recorder requirements for certain aircraft operated under Part 135. This rulemaking upgraded the equipment requirements and parameters for flight recorders. In December 1988, we promulgated drug testing requirements covering safety-related personnel.

In 1989, we instituted Airborne Low Altitude Windshear Equipment and Training requirements, mandating windshear awareness and performance training for cockpit crews.

In 1990, we promulgated a rule which designates those persons seated at exit rows as responsible for being aware of emergency procedures and knowing how to operate emergency exits; and we also established an Advance Qualification Program for the training, evaluation, certification, and qualification of flight crew members.

We have also taken measures to provide for commuter aircraft coverage in our aging aircraft evaluation program. Our program includes a special look at commuter aircraft airworthiness directives and service bulletins, and we are in the process of establishing guidelines for supplemental structural inspection programs for these airplanes.

We also have issued several notices of proposed rulemakings to address commuter airlines. In conjunction with industry, pilots and crew members, we have developed initiatives in several areas:

- One current NPRM would mandate that operators of two-pilot commuter airplanes comply with the more stringent training and qualification requirements of Part 121.
- A proposed crew pairing rule would require 100 hours of flight time to solidify the skills of Part 135 pilots of two-pilot commuters for check-out on new equipment.
- The same proposed rule would also require crew pairing of an inexperienced pilot with an experienced pilot for his or her first 75 hours in the new type of aircraft.
- We have proposed a rule which would greatly expand the use of simulators and training devices through the use of training centers. Increased use of simulation will increase pilot skills and abilities to better cope with adverse weather and emergency situations, which are difficult or unsafe to duplicate during actual training flights.

The accident statistics we have seen in 1991, quite frankly, cause me a great deal of concern. We have all seen the rapid growth of the commuter airline industry since deregulation some 14 years ago. Enplanements have grown from 11 million in 1978 to almost 40 million in 1991, and are expected to double by 2003 to almost 82 million.

The long term safety trend for commuters has, of course, been very positive. My concern about this past year's record is that it not reflect an emerging trend or highlight systemic difficulties which need to be addressed. We have carefully examined the information available to us concerning this past year's accidents, including National Transportation Safety Board data, and we do not find any common thread that would link these accidents in some manner or which suggests the existence of systemic problems in the industry. National Transportation Safety Board (NTSB) reports have been issued for two of the four major commuter accidents in 1991. The tragic Skywest/USAir accident on the ground at Los Angeles International Airport last February was attributed to controller operational error and pilot's difficulty in spotting aircraft on the runway at dusk while landing. The L'Express commuter accident last July in Birmingham, Alabama, was caused by the pilot's decision to fly into bad weather. Final reports have yet to be issued by the Board in two accidents. However, from the information available, it appears that the accidents were

primarily attributable to equipment failure and faulty maintenance procedures. To that extent, available information does not suggest the start of a safety-compromising trend, but rather an aberration in the long-term safety improvement of the industry. Although I am confident that we will continue to see the long-term accident rate improvements we have seen over the past decade, the FAA will continue to monitor the commuter industry very closely.

In closing, Mr. Chairman, I would like to emphasize that, despite a disappointing record last year compared to prior years, the commuter airlines continue to provide safe, reliable air transportation for the traveling public. I have every confidence that they will continue to do so, and I can assure you that the FAA, in conjunction with airline officials, will continue to work to improve the safety of this important segment of our aviation industry.

That concludes my prepared statement, Mr. Chairman. I would be pleased to respond to questions you may have at this time.