

5/23/2005

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Federal Aviation Administration  
Office of the Chief Council  
Attention: Rules Docket (AGC-10)  
800 Independence Ave. SW  
Washington, DC 20591

**SUBJECT: PETITION FOR GRANT OF EXEMPTION**

Pursuant to Section 11.25 of the Federal Aviation Regulation (FAR), Generic Airlines (GALA) hereby petitions the Federal Aviation Administration (FAA) for exemption from FAR Sections 121.433(c)(1)(iii), FAR 121.441(a)(1), 121.441(b)(1), and Part 121 Appendix F, to the extent necessary to permit GALA to establish an annual Single-Visit Training (SVT) program for its pilots and flight engineers. This exemption is requested pursuant to transitioning to the "Advanced Qualification Program" (AQP). Under this SVT program, rather than each GALA pilot in command (PIC) accomplishing either a proficiency check or simulator training every 6 months as is presently required, GALA would conduct a 4-day, crew-oriented, annual training and evaluation program for all cockpit crewmembers (pilots and flight engineers).

An initial AQP application has been formally submitted to FAA for the XXX aircraft.

**NATURE AND EXTENT OF RELIEF**

Implementation of Single-Visit Training will require exemptions to the following sections of the FAR: 121.433(c)(1)(iii), 121.441(a)(1);121.441(b)(1) & Part 121, Appendix F.

**FAR 121.433(c)(1)** states, in pertinent part "No certificate holder may use any person nor may any person serve as a required crewmember on an airplane unless within the preceding 12 calendar months--(i) For flight crewmembers, he/she has satisfactorily completed recurrent ground and flight training for that aircraft and crewmember position and a flight check as applicable." The extent of relief requested is that portion of Section 121.433(c)(1), specifically subparagraph (iii), which states, "In Addition, for pilot-in-command he/she has satisfactorily completed within the preceding six calendar months recurrent flight training in addition to the recurrent flight training required in subdivision (i) of this paragraph."

This relief is requested in order to permit an SVT program, as described in this petition.

**FAR 121.441(a)** states, in pertinent part, that "no certificate holder may use any person, nor may any person serve as a required pilot flight crewmember unless that person has satisfactorily completed either a proficiency check or an approved simulator course of training under 121.409, as follows--(1) For a PIC, a proficiency check within the preceding 12 calendar months and, in addition, within the preceding six calendar months, either a proficiency check or the simulator training."

**FAR 121.441(b)(1)** states, in pertinent part, that a proficiency check must include, at least, the maneuvers set forth in Appendix F unless otherwise specifically provided in the Appendix. **Part 121, Appendix F**, in pertinent part, specifies the maneuvers and procedures required by FAR 121.441 for pilot proficiency checks.

5/23/2005

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GALA requests relief from that part of FAR 121.441(b)(1), and Part 121, Appendix F (required maneuvers and procedures), in order to conduct certain fixed and variable maneuvers in lieu of all the Appendix F required maneuvers and procedures during the proficiency check. GALA proposes to review and modify the maneuvers required by Appendix F for a proficiency check to feature a check that is tailored for each airplane type, operational environment, and each crewmember position. A certain number of designated maneuvers would be identified as "fixed" while another group of maneuvers would be designated as "variable."

### **PUBLIC INTEREST**

Granting of this petition for exemption to permit combining recurrent training into an annual training and proficiency check session as previously outlined is in the public interest for reasons of safety, economics, and increased quality of training.

The single-visit concept is a comprehensive program that integrates all of the elements of training and checking. This training program, when considered in its entirety, provides for better training for PIC's in a single annual visit to a training facility than is presently accomplished under the 6 month visit required by the current FAR. Also, this program offers an increase in the amount of training/checking the SIC and F/E will receive. The SIC is currently required to complete a proficiency check or a LOFT within a 24 month period and within the preceding 12 months, either a proficiency check or any simulator training course under FAR 121.409. Under the proposed SVT program, the F/O will exceed this requirement by receiving a full crew, 4 hour simulator training period, a 2 hour LOFT period, and a 2 hour full crew flight check, every 12 months. Since the F/E is allowed to substitute an approved line-oriented simulator training program for the proficiency check during recurrent flight training under FAR 121.427, the F/E will also exceed the current requirement by following the same footprint for the SVT cycle as the PIC and SIC. The F/E will receive not only the required check, but a LOFT, and a 4 hour simulator training period. This addition, when coupled with the briefing and debriefing periods, will enable these crewmembers to increase their skills well beyond those which the current program offers.

GALA's proposed single-visit training will provide better quality and more realistic training because the emphasis will be on crew training over individual skills checking, while still ensuring crewmember proficiency. The quality of training will be better because there will be less emphasis on canned, often improbable maneuvers and more emphasis on realistic operational problems. Crew problem solving skills will be further enhanced through the use of real time scenarios presented in recurrent LOFT periods. Crewmembers will spend more time training on proficiency maneuvers and in LOFT, practicing CRM principles as a crew. Emphasis on the crew concept is important because experience has shown that the best results in emergency situations are achieved by well-coordinated crew action. In recent years, industry accident reports have confirmed a need to place increased emphasis on the crew concept in training, and these reports have been the impetus for the implementation of the CRM Program. Crew concept training has the additional advantage of providing substantially more effective training for the crew than required by present regulations.

5/23/2005

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The economics of a SVT program are favorable to the public as well as to the airline. These economies can be realized while maintaining the established high standards of crewmember proficiency through better quality training. Under the SVT Program, savings will be accomplished through more efficient training scheduling, lower crewmember expenses, reduced crewmember travel, and better utilization of both physical and personnel training assets..

GALA believes that by granting this exemption, the data gathered and experience gained under this proposal will serve as a basis to support future amendments to FAR 121 and the AQP, which, in turn, would be valuable for other air carriers as they transition into AQP's. The concept of an AQP encourages the development and use of innovative training and qualification programs that incorporate the most recent advances in training methods and techniques. AQP will enhance professional qualifications above the standards of Part 121 of the Federal Aviation Regulations which apply to all Part 121 carriers. Specifically, GALA's proposed Single-Visit Training Program is a first step toward integrating an AQP for all of our aircraft.

### **EQUIVALENT LEVEL OF SAFETY**

GALA believes that its proposed plan and requested exemptions will not merely provide an equivalent level of safety to operations under this present regulation, but will in fact, enhance safety. Operations under the exemption requested herein should enhance total air safety due to the expansion of Crew Resource Management (CRM) training in the proposed training program. Aviation technology has changed rapidly in recent years, resulting in a whole new set of crewmember skills required to operate in today's environment. The very advances in technology which have enhanced the safety of today's jet transport have led to the need for increased emphasis on the human aspects of flying. Historically, pilot training has focused on individual flying skills and systems knowledge while neglecting or ignoring such factors as how pilots communicate with one another, the process of decision making, and the effective management of all the cockpit resources.

Accident findings in recent years have revealed inadequate skills in applying effective human factors management principles. Equipment failure, flying errors, and bad weather are becoming less prominent as the causes of aviation accidents. In many instances, relatively minor problems deteriorated into major accidents because of a lack of proper Crew Resources Management. In fact, today, poor Crew Resource Management is considered a significant factor in a majority of commercial jet accidents.

GALA believes our proposed SVT program will address this critical need for improved human factor skills through the use of crew concept training. Our proposed single-visit program will permit more operational training for GALA pilots and will provide the opportunity to reinforce management skills in an operational environment. This will be accomplished by using simulators in LOS programs, by conducting a thorough critique utilizing electronic support equipment (video), and by administering a proficiency check with the same complete crew.

In summary, the single-visit training plan proposed by GALA substantially improves the quality of training and checking compared with that required under the existing regulations. Our plan focuses the training and checking effort where experience has shown it to be most valuable.

5/23/2005

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**EXCEPTIONS TO PUBLICATION OF SUMMARY OF PETITION FOR EXAMPLE**

In accordance with the provisions of FAR 11.27(j)(3)(i) (Exceptions to Publication of Summary of Petition for Exemption), GALA requests that a finding of good cause be made for waiving publication in the Federal Register, since similar exemptions and waivers for this purpose have been granted to other Part 121 air carriers electing to participate in the SVE/AQP program. The justifications and supporting arguments are nearly identical to those presented by GALA. In view of the numerous opportunities to comment in the past, and the analysis previously done by FAA in the related industry cases, which ultimately resulted in grants of exemption, GALA requests that the publication and comment period be waived.

**SUMMARY**

As required by FAR Section 11.25(d), a summary of the petition is as follows:

Generic Airlines requests exemptions from FAR 121.433(c)(1)(iii) (6 months training required), FAR 121.441(a)(1) & (b)(1) (proficiency checks), and Part 121, Appendix F, (Proficiency check maneuvers and procedures), to the extent necessary to permit transition to an annual four-day, Single-Visit Training Program for its pilots and flight engineers.

Sincerely,

Appropriate Signature Authority

cc: Aviation Inspector (POI)  
T. M. Longridge, Mgr. AQP Branch (Hq FAA/AFS-230)