## NATIONAL TRANSPORTATION SAFETY BOARD WASHINGTON, D.C.

ISSUED: May 21, 1974

Forwarded to: Honorable Robert D. Timm Chairman Civil Aeronautics Board Washington, D. C. 20428

SAFETY RECOMMENDATION(S)

А-74-44

The National Transportation Safety Board uses certain statistical information collected by the Civil Aeronautics Board when it evaluates and reviews aircraft accident data and in its special safety studies. The availability of exposure data that can be applied to safety varies greatly between certificated route air carriers, supplemental air carriers, and air taxi operators. Thus, as a result of our air taxi safety study in September 1972, the Safety Board recommended that CAB require: (1) That commuter air carriers report hours flown, miles flown, and departures in scheduled revenue operations; and (2) that all air taxi operators report the number of passengers carried, the hours flown and miles flown, and the number of departures in revenue operations.

In the subsequent Notice of Proposed Rule Making (NPRM) relating to these data, the CAB expanded upon our recommendations and proposed that quarterly reports of commuters' scheduled operations include revenue passenger-miles, revenue seat-miles available, revenue ton-miles, and revenue ton-miles available. The Safety Board understands that the comments on the NPRM are being evaluated, and its views have been submitted in a letter, dated December 11, 1973, from General Manager, Richard L. Spears, to Arthur H. Simms, Associate General Counsel. The Safety Board appreciates CAB's support and consideration of its recommendations.

Recently, some of the Safety Board's staff have reviewed the availability of safety-related data for U. S. certificated route and supplemental air carriers. In the case of the certificated route air carriers, our staff found that hours flown and miles flown are reported for both revenue and nonrevenue operations, but that departures are reported only for revenue operations. In view of the important relationship between air carrier accidents and takeoffs and landings, as measured by number of departures, departure data for both revenue and nonrevenue operations are an important asset for safety statistical analyses. Honorable Robert D. Timm

In addition, accident rates based only on revenue departures tend to misrepresent the actual circumstances, depending upon the relative number of training or ferry accidents. Since departures involving these nonrevenue operations are not reported, the computation of rate data is restricted necessarily to the use of revenue departures as an exposure base. Thus, interpretation consequently suffers from what is not included, rather than from a factual deficiency in the available data.

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In the case of supplemental air carriers, our staff has noted that while hours flown are reported for both revenue and nonrevenue service, miles flown are reported for revenue service only. Since supplemental air carriers are essentially comparable to the certificated route carriers, their activities should be measured based on the same exposure data. Thus, for purposes of comparison in the all-operations category, miles flown in nonrevenue service is the only additional information needed, assuming that departure data which are currently collected for ICAO are as accurate and complete as other information reported on CAB Form 41.

With regard to specific types of supplemental operations, such as passenger service or cargo service, our staff found that although certain data were collected on a summary basis in the revenue category, there were little or no data that applied directly to these services. Again, the Safety Board believes that an exposure base comparable to that of the certificated route air carriers is essential particularly with respect to hours flown, miles flown, departures, seat-miles available, number of passenger-miles flown, freight ton-miles flown, and freight ton-miles available. Identical exposure data will serve a dual purpose: (1) As a means of reviewing the accident status of all certificated route and supplemental air carriers, and (2) as a means of comparison.

Therefore, the National Transportation Safety Board recommends that the Civil Aeronautics Board:

Require the periodic reporting of certain additional statistical data as follows: (Safety Recommendation A-74-44).

(a) For certificated route and supplemental air carrier operations in the nonrevenue category -- departures and miles flown, respectively (assuming that the revenue and nonrevenue departure information for the supplemental air carriers which is presently collected for ICAO is equivalent in scope and accuracy to other information reported on CAB Form 41).

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(b) For use in connection with supplemental passenger and cargo operations -- hours flown, miles flown, departures, freight ton-miles flown, and freight ton-miles available should be individually reported for both services; seat-miles available and passenger-miles flown should be reported for passenger service operations only.

Personnel from our Bureau of Aviation Safety will be available if information or assistance is required.

REED, Chairman, McADAMS, THAYER, BURGESS, and HALEY, Members, concurred in the above recommendations.

y:// John H. Reed Chairman

THIS RECOMMENDATION WILL BE RELEASED TO THE PUBLIC ON THE ISSUE DATE SHOWN ABOVE. NO PUBLIC DISSEMINATION OF THE CONTENTS OF THIS DOCUMENT SHOULD BE MADE PRIOR TO THAT DATE.