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WASHINGTON, D.G. 20091

CATICE OF THE CHARMAN

June 10, 1970

Honorable John H. Shaffer Administrator Federal Aviation Administration Washington, D. C. 20590

Dear Mr. Shaffer:

The Board's recently completed analysis of accidents involving Air Taxi Operations, 1964-68, has disclosed an area of concern which we believe merits a closer look into the pilot time in type in passenger operations.

Although there are many accidents involving low pilot experience in the type of aircraft, we are detailing two herein to explain the reason for our concern. On February 15, 1967, a Cessna 182 on an air taxi flight from Youngstown, Ohio, experienced an engine failure during the initial takeoff climb. While the pilot was attempting a 180° turn back to the runway, the aircraft stalled and crashed. The aircraft was destroyed, and both occupants, the pilot and his passenger, were fatally injured. The pilot's lack of familiarity with the aircraft was cited as a related factor in the accident. He had only 2 hours of experience in this type of aircraft before this flight.

Two passengers and a pilot were killed and one passenger was seriously injured in an accident at Vidalia, Georgia, on June 1, 1968, when the aircraft, a Cessna All, experienced an engine failure during the initial takeoff climb. The aircraft was destroyed when it stalled and crashed. The probable causes cited were the powerplant, improper operation of powerplant and powerplant controls, improper emergency procedures, and the failure to maintain flying speed. The Board also noted that improper single-engine procedures were employed. The pilot, who had a Commercial Pilot's Certificate, had 6,850 hours of total time, but had only 10 hours of experience in the Cessna All.

During the preparation of the analysis of Air Texi Operations, it because evident that the accident involvement of pilots with very little time in type was quite different from that of pilots with more experience in type.

The data for the 5-year period indicated that in 83.33 percent of the fatal accidents in which the pilots had 25 hours experience or less in type, the pilots caused or contributed to the cause of the accidents. Pilot involvement in nonfatal accidents is also greater for pilots with 25 hours or less in type, in this case 80.52 percent.

Although the Safety Board reviewed your notice of Proposed Rule Making 69-4 and made specific comments on May 1, 1969, no mention was made of the following recommendations. We are mindful of the fact that Amendment 135-12 just became effective on April 1 of this year. We consider, however, that the information obtained, subsequent to our review of NPRI 69-4 is of such significance that it should be brought to your attention.

In view of the foregoing, and as additionally supported by the 5-year study, it is recommended that:

- (1) a comprehensive review be made of the Federal Aviation Regulations, Part 135, Subpart D, pertaining to pilot-incommand qualifications with a view toward specifying pilot-in-command time in type requirements; and
- (2) the Administrator's staff meet with representatives of our Bureau of Aviation Safety to discuss in depth this Air Taxi Accident Study to determine what additional analyses would prove most fruitful in increasing safety in Air Taxi operations.) Particular areas recommended for further study are certain detailed cause/factors, such as inacquate preflight preparation and/or planning or inadequate maintenance and inspection.

The Safety Board has approved the 5-year Air Taxi Study for publication Copies will be forwarded to you as soon as they are returned from the printers.

Sincerely yours,

John H. Reed

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Enclosure