

**UNANSWERED QUESTIONS
SESSION IV**

Due to the number of question cards submitted during the Session IV Q&A period, not all of the questions could be answered by the technical panel in the time allotted. Answers to the questions not answered verbally are listed below.

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SHANNON JIPSEN, INDEPENDENT PILOTS ASSOCIATION

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Question: Does the Operator / Airline not share some responsibility to their crews by not utilizing airports with no or inadequate ARFF?
Are you saying that cargo should be prohibited from flying into non-139 airports (without ARFF)?

Answer: We are flying Part 121 aircraft for a Part 121 air carrier and are trained as Part 121 pilots. What I am saying is we need One Level of Safety for ALL Part 121 air carriers & crews when it comes to ARFF.

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Question: Regarding AIP monies. The question is AIP money does not cover maintenance and operations. Do I think that cargo airlines will pay for that?

Answer: As mentioned in the presentation, currently cargo airlines are already paying for ARFF services at many airfields through the landing fees they pay even though ARFF services are not required for cargo carriers. Therefore, I think just as most airport operators do now; the operations and maintenance costs are added up and divided amongst the carriers that utilize that airport. Since most landing fees are based on weight, the cargo aircraft utilized by Part 121 cargo carriers are mostly heavy jets, the money is going to continue to flow into airports from cargo air carriers to help cover these costs.

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Question: Do all ARFF (“CFR”) operations know that UPS carries unlimited amounts of passenger quantities in “inaccessible” locations?

Answer: As stated in my presentation, under current Part 139, ARFF responders are NOT required for cargo carriers. Therefore, they are NOT required to be trained about cargo carriers. This is why USC 44706 needs to be changed!

Cargo crews need to know that ARFF responders will be there to meet them if an emergency arises and ARFF responders deserve to have training regarding the types of HAZMAT carried on cargo carriers and that there are differences amongst the cargo carriers. The safety of the ARFF responders is very important too and they need to understand and be trained on these differences.

BRUCE BRIELMAIER, AIR LINE PILOTS ASSOCIATION

Question: Why are your recommendations for safety improvements addressed to the FAA and none to the operators?

Answer: In general, we feel that it is the role of the FAA, as the regulator, to establish the standards necessary to maintain an appropriate level of safety. The focus of our paper was on the differences in the regulations that apply to cargo operations vs. passenger operations, so our comments were necessarily oriented in that direction. However, we would certainly support operators who chose to voluntarily implement changes to improve safety, even without a regulatory requirement to do so.

Question: Does the time you show of the Memphis accident include their luggage?

Answer: The times we showed in our presentation were derived from watching a videotape of the evacuation, and were measured from the time someone became visible in the window until they were on the ground. If the egress were impeded by luggage or any other factor, it would likely have been before they were visible on the tape and so would not have been included in the context of our presentation. Discussions with the people on board the accident aircraft indicated that the luggage was tossed out while the individuals were waiting their turn to exit, and was tossed out the cockpit window that was not being used for the crew egress, since there was too much smoke on that side.

Question: Please explain the difference between active and passive fire suppression.

Answer: Active fire suppression means that something is being introduced to suppress the fire, such as an extinguishing agent like halon or water. Passive suppression would include things like simply containing a fire inside a compartment and allowing it to burn out without escaping the compartment, or depressurizing all or part of the airplane in order to deprive a fire of oxygen.

Question: Your statistics showed [the] average age for cargo aircraft was 28, when we heard it was 14-23 this morning. Why?

Answer: The 28 year average fleet age was for US all-cargo airlines operating fleets of 5 or more aircraft the size of DC-9/B727 or greater. I suspect that the 14-23 year value was generated using a different set of data; it likely includes a lot more airplanes, including smaller operators and those with smaller aircraft. The 10 year spread (“14-

23”) seems odd, and the five year difference between 23 and 28 isn’t terribly disparate. We would need to go back to the source data to really determine the reason(s) for the differences.

TODD GUNTHER, AIR LINE PILOTS ASSOCIATION

Question: Should there be different cargo hold fire suppression rules for regional jets, and if so, why and how?

Answer: Aside from loss of control, an on-board fire is the most critical hazard a crew and aircraft can face in flight. Since the fire’s rate of spread, and its effect on aircraft controllability and structural integrity can be extremely difficult to assess quickly, the most important commodities to that flight crew and aircraft are time and a place to land. Fires which burn for longer than approximately 20 minutes usually result in loss of the aircraft, crew and passengers/cargo. Ensuring the aircraft’s integrity for that minimum amount of time is therefore of paramount importance. Fire knows no difference between a small aircraft and a large one, and thus the protection/suppression schemes must be just as effective in both. How that protection is accomplished might be via different rules, but the end result must be equivalent.

AIR LINE PILOTS ASSOCIATION

Question: What is ALPA’s position on the installation of CVRs in all twin turbo powered aircraft in commercial activity whether cargo or passenger – and why do you take this position?

Answer: CVRs clearly have a place in the safety world, and do frequently provide information useful to an investigation. As part of our One Level of Safety campaign, we are striving to promote an equivalent level of safety across the fleets that we represent, be they large or small aircraft, carrying freight or passengers. So in this regard, we support the installation of CVRs, but only with the appropriate data privacy and protection measures. If the question is whether CVRs really provide the most “safety bang for the buck” (instead of say FDRs or FOQA/ASAP programs) that is a different and more complex issue, and one that is beyond the scope of this forum.

Question: Are you aware of incidents where cargo pilots are told to return a plane to home base even though there is a known malfunction of a critical component or instrument?

Answer: Per the FARs, the Captain has the final authority regarding whether he/she will accept an aircraft as safe for flight. Unfortunately, some Companies do tend to pressure

crews to operate aircraft that the Captain has deemed to be not completely airworthy. We have been exposed to a surprising amount of anecdotal evidence of crews being pressured into postponing mechanical write-ups until the aircraft has been moved to a location where maintenance could more easily be accomplished. Our legal department has been involved in defending crews (typically against their company) who were suspended or terminated because they refused to operate aircraft that they felt were unairworthy. So yes, those pressures and events do occur.

