

November, 2008  
Volume 2, Issue 2

# FAA FIRC Facts

FAA AFS-810 Flight Standards Certification and General Aviation Operations  
Gregory French, National FIRC Program Manager

## FAA FIRC Headlines:

- Pilot Deviations on the RISE
- CFIs to be issued letters when student commits PDs
- FSIMS – Regulatory and Guidance GOLD MINE by the FAA
- IACRA Training Site Moving
- Graduation Certificate retention requirements
- Why TSA Training for CFIs?

**Just a reminder: – be sure to check the FIRC website regularly (say, once a month or so). It's the first place where new FIRC-related info will be posted.**



## Pilot Deviations on the Rise: A Training Opportunity

**Pilot Deviation:** “An action of or by a pilot that results in a failure to comply with an ATC clearance and/or instruction.”

Pilot deviations include runway incursions, airspace violations, and altitude busts. And they're all on the rise. Which begs the question: “Why?” And it's a good question. Most PDs do not result in injury or damage to equipment. But each has the potential to be catastrophic.

Today's U.S. airspace system is the safest it's ever been and remains the safest in the world. Through much time and great effort, we, the pilot community, industry, and the FAA, have worked together to eliminate virtually all of the historic systemic root causes of accidents. Yet PDs, which certainly could lead (and have led) to horrific accidents (think: Tenerife) continue. And worse, they now appear to be on the rise.

The FAA and the entire aviation community are concerned. The Agency is currently initiating an emphatic program of information dissemination to enhance PD awareness, to plant, and keep firmly, in the fore-brain of each and every pilot, PD consciousness. Thinking about it – awareness – can make all the difference in any given potential PD situation. Consider the 25,000 hour air carrier captain who crosses a hold short line

without a clearance. He/she doesn't do it deliberately. For whatever reason, he/she, for just a moment, lost awareness of those facts and conditions that should have prevented him/her from making that potentially catastrophic move. We need to be thinking about it all the time.

In addition, the FAA is initiating a study to try to determine the remaining causes that are leading to these occurrences. Hopefully, the results will lead to processes, coordinated with industry, that can be put into place to begin contributing to a reduction, and, ultimately, the elimination, of PDs altogether.

And here's an opportunity for the trainers of trainers, the FIRC providers, to help contribute to the effort to reduce and eliminate this growing problem. We, at the FAA, and I personally, are asking you, the FIRC provider (**not** mandating – *requesting* of you) to find a way to begin interweaving the idea of Pilot Deviation Awareness throughout your presentations.

There are many opportunities in several of the core topics to include discussion of PDs. You might even include a new elective module on the subject.

Understand, you don't *have* to do any of this, but it's a great opportunity to use your unique ability to reach a large cadre of instructors and make a direct

contribution to a critical area of flight safety that concerns us all. No one wants to commit a PD, and no one wants to see a fellow pilot commit a PD. And, most certainly, no one wants to witness the potential dire consequences. So, I would ask that all of you consider how you could contribute to this effort in the ways that you know best. You're the training professionals. You don't just train – you train the trainers. Do what you do best, the best way you feel it should be done. You'll get automatic approval for any TCO changes you might choose to make and you'll get them fast. We'll do anything we can to help facilitate your inclusion of this incredibly important topic.

By the time you read this there should be a new FAA PD clearinghouse website where you can find PowerPoint presentations, documentation, brochures, and more on the topic. There will be a link to Pilot Deviations on the <http://www.faa.gov> website, under “Highlights.” Please make a point of visiting the site and making your attending flight instructors aware that the site exists.

And please, let me know if there's anything I can do to help facilitate the inclusion of Pilot Deviation Awareness into your presentations. After all, I'm with the FAA, and I'm here to help . . .

## Student Pilot Deviation Letters to CFIs

As part of the FAA’s growing effort to increase Pilot Deviation Awareness, the Agency will begin notifying CFIs when one of their students has committed an actionable PD. This will apply primarily to initial private pilot (ex)students, and to instrument (ex)students.

Here’s how it will work: If a private pilot or instrument pilot commits a pilot deviation within one year of acquiring his/her certificate, the FAA will identify their primary instructor for that certificate and send that instructor a letter informing them of their student’s infraction.

Several points must be made here. First, this letter will not carry any penalty or sanction. It is merely information which most conscientious instructors would probably want to know in any event. However, while

this is in no way a “black mark” against any instructor, the records will be retained and analyzed. Obviously, if a clearly identifiable trend emerges related to a particular instructor, the FAA would probably want to find out if there’s a systemic problem that should be addressed.

Why are we doing this? Several reasons, the first of which was identified above: to let instructors know that one of their (past) students has had some difficulty. The instructors, many of whom maintain relationships with their past students, might want to use that information as an opportunity to spend a bit of additional instructional time with them. Receiving one of these letters from the FAA would certainly increase the instructor’s PD awareness and perhaps encourage him/her to increase their

emphasis on the topic throughout their training efforts.

As earlier stated, tracking this information will help the Agency identify any potential obvious individual trends. But, more generally, if we see a pattern of incidents emerging throughout the training industry we may want to redress some of our training materials and techniques such as revisions to the Aviation Instructor’s Handbook.

Understand that this is an awareness initiative, both to make the CFIs personally more aware of Pilot Deviations, and for the FAA to be more aware of patterns and trends among the CFI and new pilot community. As is often said: information is power. In this case, the power to help save lives.



*“It is merely information [about students who commit pilot deviations] which most conscientious instructors would probably want to know in any event...”*

## Flight Standards Information Mgmt System: FSIMS

We all live by rules, regulations, and guidance. Most of us know how and where to gain access to those rules, regulations, and guidance that most concern us. But, were you, or your FIRC attendees, aware that the FAA has a central clearing house website for ALL (or virtually all) FAA rules, regulations, and guidance? Well, it does, and it’s called FSIMS, for Flight Standards Information Management System.

As you would expect, it has all of the Federal Aviation Regulations, but you’ll also find Notices, Bulletins, Orders, NPRMs (Notices of Proposed Rulemaking), ADs (Airworthiness Directives, ACs (Advisory Circulars) and much, much more than I could possibly list here.

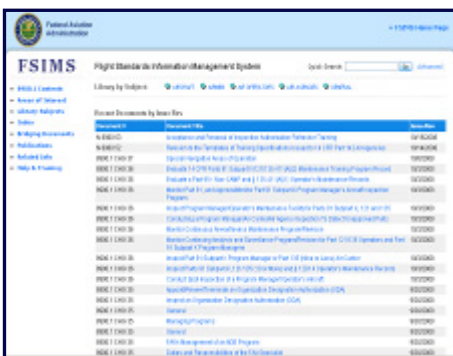
Here’s something that I bet not many of you knew about. You’re probably aware that everything, and I mean *everything*, an FAA inspector does, be they Ops Inspectors, Airworthiness Inspectors, or Avionics Inspectors, is clearly spelled out in specific inspector guidance. This includes conduct of inspections, check rides, enforcement actions, *everything*. The part that I’m willing to bet that most of you didn’t know is that their guidance is freely available on the internet. That’s right! Right there for the reading.

Are you a Part 141 flight school about to be inspected by your friendly local FSDO? Wouldn’t it be nice to know exactly what they are tasked with doing while

visiting your site? How about that 135 check you’re about to take? Ditto. Just been pinged with a pilot deviation? What procedures are the inspectors going to follow? Double ditto.

It’s all there in the plain-English document called the Combined Electronic Inspector Handbook, 8900.1, and all approximately 8,000 pages are available through FSIMS.

You can find all of this and more at the FSIMS site at <http://fsims.faa.gov/>. If you happen to forget the url, just Google “FSIMS” and the first link that pops up will take you there. Take a few minutes to visit the site. You’ll be impressed with the amount of regulatory information that’s available, courtesy of your friendly FAA (remember, we’re here to help. . .).



## IACRA Training Site Moving



IACRA, the Integrated Airman Certification and/or Rating Application, is a topic that everyone is teaching.

The IACRA Training clearinghouse Website, a teaching aid AFS-800 put together, has successfully been hosted by FAASafety.gov and has enjoyed tremendous visitor activity over this past year. Thanks to the outstanding efforts of the IACRA IT program manager and his programming team, the IACRA main computer processing site is now able to host the training site directly. This will mean more rapid updates and much faster solving of training site issues if or when they might arise.

For the most part, this move will remain transparent for the next several months. During that time, the old link, <http://www.FAASafety.gov/IACRA>, will remain active, but will direct users to the new website at <http://iacra.faa.gov/IACRA/TrainingAndDocs.aspx>. You can link to it by just going to the IACRA main site at: <http://iacra.faa.gov/iacra/> and clicking on: "Training and Documentation" on the left side of the page.

Please let all of your attendees know that the original site will be going away at an as yet undetermined date.

On another IACRA note, a

major update of IACRA will be rolled out by the never-tiring IACRA programming team in a few weeks. That will be Version 7.0. There will be many improvements but one of the biggest and most obvious will be the "autofill" feature where all known airman information regarding an applicant will automatically be filled into the appropriate spots. This is going to eliminate the painful and repetitious (and potentially error-prone) inputting of data already existing in the FAA's databases. This will speed the application filling exercise considerably.

The program is undergoing final testing as I write this and is planned for release on December 17, 2008. Look for it!

---

*"They tell me they are now going to be issuing \$10,000 fines for each violation they find. That's right. Ten big ones or more. Think your CFIs might want to know about this? ..."*

## Record of Graduation Certificates

Just a reminder: as outlined in the AC 61-83F, FIRC providers are to issue graduation certificates with sequential numbers.

This makes the graduation certificate a de facto controlled document. The graduation certificate is used as identification and confir-

mation that an individual CFI has successfully completed a valid, FAA-approved FIRC. As such, the FIRC provider MUST retain a record of that individual and his/her certificate number for two years. The two years is required since it is presumed to be the duration of his/her CFI certifi-

cate. If the validity of a certificate were to come into question regarding method of last renewal, that certificate number becomes critical and must be verifiable. After two years it becomes moot for most cases. So – be sure to maintain those records since you may be called upon to produce them.



## Why TSA Training?

The question has come up a number of times as to why we are requiring TSA training as a core course since the idea behind FIRCs is safety. Safety drives virtually everything the FAA does to some degree or another. But, you might, rightly, ask, how does TSA training relate to safety of flight? Well it doesn't. This one is the exception. In the case of TSA training, the fact is, we're looking out for our instructors.

There are a number of things that the TSA requires of CFIs

that have nothing to do with the FAA and with which the FAA has no involvement. For example, citizenship verification. CFIs must verify citizenship for certain training and make and retain records of that verification. CFIs must receive recurrent security training. There are other TSA issues instructors must be aware of to keep them out of trouble.

Here's the deal: In meetings with the TSA over the Alien Flight Student Program they have told me that they are

"moving out of the training phase into the enforcement phase." What this means for the CFI is it will no longer be a slap on the wrist and a lecture if they are found not to be in compliance with TSA requirements. They tell me they are now going to be issuing \$10,000 fines for *each violation* they find. That's right. Ten big ones or more. Think your CFIs might want to know about this? It's our opportunity and our obligation to tell them. It could cost 'em big if we don't.