

# CHIRP FEEDBACK

Issue No: 88

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## EDITORIAL

The recent demise of two UK AOC Holders is a stark reminder of the commercial pressures affecting most sectors of the air transport industry. Other UK operators have responded to the new economic imperatives by consolidation through mergers and acquisitions.

In the current economic climate, it is understandable that all operators will seek to re-examine every area of their business to ensure that the most cost effective processes and procedures are employed. Some of these will involve the introduction of new working practices, new technologies and improvements in efficiency. Inevitably, the consequent cultural and procedural changes will be unsettling for a number of individuals; this is to be expected.

Some concerns related to recent changes have been raised through this Programme. Among the reports received are a number from flight crew, cabin crew and engineers suggesting that some recent changes are having or might have a deleterious effect on safety standards. The role of this Programme is not to determine whether these changes have actually affected safety, but to raise the general awareness to these perceptions and also to bring them to the attention of operational managements or, when relevant, the Regulatory Authority, to permit them to be considered.

One example is related to sector fuel policies. Approximately 10 years ago, following reports to this Programme that a non-UK operator appeared to be entering UK airspace with insufficient fuel reserves, an investigation by the CAA proved the reports to be accurate. Subsequently, the CAA conducted a Specific Objectives Check (SOC) of the fuel policy of UK operators; this concluded that UK airlines' fuel policies were generally compliant with the requirements, although a number of computer-generated fuel plans did not reflect some routings/profiles accurately. The SOC contained a number of recommendations for UK operators. In addition to the SOC recommendations, the CAA issued specific guidance in 1998 in respect of aircraft entering UK airspace stating that pilots should be prepared to hold for up to 20 minutes, even if issued with a "No delay expected" clearance; this advice was restated in 2003 and, again, more recently in AIC 83/2008 (Pink 149). As noted on Pages 9/10 of this issue, some operators have elected to instruct pilots not to follow this advice, apparently for

commercial reasons, on the basis of statistical data on holding delays for inbound aircraft.

Other examples where reporters have perceived that changes have adversely affected operating standards are the ease of accessing operational/technical information following the replacement of hard-copy flight information/ manuals with electronic data, changes to Standard Operating Procedures (SOPs) that allegedly have been introduced without the provision of specific training (Page 11) and the wider application of Flight Time Limitations Variations than currently stated in Regulatory guidelines (Page 12).

Commercial Air Transport operations must be safe and also commercially viable. The two are not mutually exclusive and a careful balance must be maintained to ensure that commercial pressures do not result in too many holes in the 'Swiss cheese' lining up with a potentially deleterious effect on safety.

Peter Tait

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AIR TRANSPORT FEEDBACK is also available on the **CHIRP** website - [www.chirp.co.uk](http://www.chirp.co.uk)

An Air Transport Safety Newsletter

from **CHIRP** the Confidential Human Factors Incident Reporting Programme

# SECURITY REPORTS

**CHIRP Narrative:** In previous issues we have reported that both the Department for Transport and the Civil Aviation Authority have declined to take any action in response to the reported difficulties experienced by flight crew, engineers and other airport staff as a result of inconsistencies in airport security searches and allegedly inappropriate behaviour by a small number of security staff.

A senior member of DfT (Transec) recently reaffirmed the Department's position and the rationale for the Department's stance in a presentation to the UK Flight Safety Committee

We are continuing to receive reports/comments on this topic, of which the following are a selection.

## SECURITY SCREENING (1)

**Report Text:** Sir, with regard to the reports relating to security matters in FEEDBACK Issue 87, I find the CAA's view on this perplexing. Is it really necessary to formally state an impaired ability to operate after being bullied by confrontational and aggressive security staff?

Does it not go without saying that surely this is inherently a flight safety matter?

## (2)

**Report Text:** The level of security screening, its unpredictability and the poor training of the operatives, IS a safety issue and the CAA are burying their head in the sand, if they pretend it is not. Most other countries seem to carry out the task successfully without alienating crews, and causing them to arrive at the aircraft in a very stressed state.

## (3)

**Report Text:** Luckily I work for a company that wants to be 'proactive in safety'. This doesn't mean we are perfect but it does mean that we believe today's reports are tomorrow's incidents. I was angered by the CAA response to all the security letters. Do we have to wait for an incident for us to take genuine, passionate feedback seriously? Surely not!

## INAPPROPRIATE SEARCH (FEMALE FLIGHT CREW)

**Report Text:** Going through crew security I set off the metal detector. I was taken aside by a BAA officer in order to be searched. Since my belt is part of my trousers I couldn't take it off. Publicly the officer grabbed the belt with one hand and inserted the other without permission well below belt level. I felt humiliated and embarrassed. My management advised me to report this incident.

**Lessons Learned:** Call the security supervisor and complain. Ask for a name and take the matter further.

## PUBLICATION OF REQUIREMENTS

**Report Text:** Could the CAA/BAA/Airport Authorities jointly publish crew security requirements and results

and place these in clear view at the screening machines?

## FRIEND OR FOE?

**Report Text:** Security - sadly 'we' are the enemy!

Security these days sets the hair on my neck to stand up immediately walking thru' UK security. Latent aggression, rudeness arrogance from staff.

At XXX (Major UK regional airport) for a series of flights I was called by "crewing" to fly as a passenger to YYY (major UK airport) to night stop and following morning "position" an aircraft empty back to XXX.

Carrying my suitcase through YYY security; the "lady" security officer told me I should check my suitcase in via the check-in desk.... I advised her I was just positioning the a/c empty to XXX and therefore there was NO check-in desk.

She told me all my toiletries would be confiscated. I advised her to be sensible and practical but she would not listen or compromise by looking through my suitcase contents to confirm I was not a terrorist or suicide bomber!

I called the supervisor and explained the situation with this women bleating in the background...

"Okay, on your honour, if you put this suitcase in the hold (on a large wide-body twin!), you can take it now!"

So the case, much to amusement of the dispatch agent, was loaded in Hold # - after a 30min wait to get a low loader.

I explained to the 'lady security officer' (a euphemism if ever I heard one!) that if I wanted to press a red button and disconnect the auto pilot I could point the aircraft at anything I wanted and she would have no control over what I hit!

Shoes off, belt off, water off, calculator out of pocket, what a load of nonsense to start your working day.....

## SEGREGATION OF INBOUND/OUTBOUND CREWS

**Report Text:** AAA does not allow mixing of inbound and outbound crews. They have not informed our company of this. Other UK airports do; some airports require crews to walk to aircraft on the apron, as opposed to using jet bridges, and can't stop the crews mixing, so this rule can only be arbitrary.

1. LANDED. Crew waited at gate for bus where outbound crew were also waiting. As we had a few technical defects, the Captain ran these past the other crew. A security officer came over and very abruptly told us we were not allowed to mix. Telling her colleagues "HE SHOOK HIS HAND!?" loudly. I found her manner very officious and the flight deck crew all felt wound up.
2. OUTBOUND. I was already on the aircraft when the rest of the crew arrived. The Captain wound up and the senior cabin crew member furious at the aggressive manner of the security crews, again, when they had mixed with the inbound crew. It took some time for them to calm down. (During which they were doing their pre-flight duties - not very conducive to flight safety).

My points:

1. Handing over the aircraft allows very valuable information to pass between crews and frees-up capacity, yet AAA have stopped this by not allowing crews to mix.
2. If I had wound-up the No 1 to the point where she was furious before the flight, I'd have been shot! (And quite rightly too!) But it's OK for security personnel to behave like this. Teach them how to deal with people! I know they have a job to do, but so do I!
3. If crews can (and do) mix at other airports (lo-cost will often have both crews preparing the aircraft during changeover to speed things up) then this no-mix rule at AAA has no security basis and should be stopped.

That's better, thanks for listening.

**CHIRP Comment:** In spite of these continuing problems there would appear to be little prospect of any general initiative. In view of this, we have analysed all of the security-related reports that we have received with regard to the airport location and have approached both the Airport Operators' Association (AOA) and the BAA directly at a senior level to represent reporters' concerns and to seek their assistance in raising the awareness of security managers and staff at UK airports to the reported difficulties and the potential flight safety implications of such incidents. These discussions have focussed on four aspects:

- Inconsistent search standards, as applied to flight crew, engineers and other airport staff.
- Lack of knowledge of agreed guidelines for flight crew (e.g. . contact lens fluid; medication)
- Inappropriate behaviour by a small number of security staff.
- The absence of any complaint/grievance procedure.

The reaction of the BAA has been very positive. The Director of Security BAA has agreed that the searching of flight crew and other staff with critical safety responsibilities will be added to the refresher training for security staff at BAA airports that is shortly to commence and will continue through the next several months.

In a case where an individual/crew is subjected to inappropriate behaviour, the BAA advice is, whenever possible, to raise the matter at the time in a polite but firm manner, with the duty security supervisor, who should always be available. If a supervisor is allegedly not available or elects not to acknowledge your complaint, submit a report including this information to your company and request that the matter be raised at the next meeting of the local airport users' security committee. Also, if you consider that an incident could have led to a flight safety risk, as opposed to an inconvenience, submit an MOR or, if you are concerned about the possible consequences, report it through this Programme.

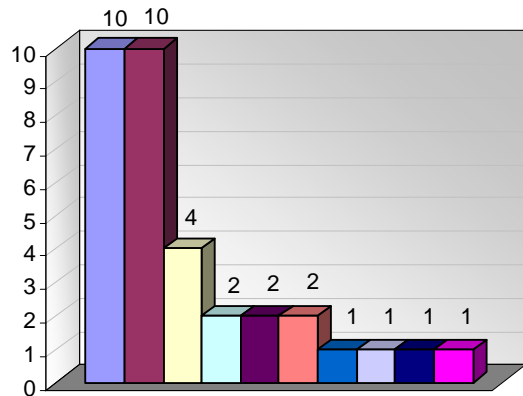
In relation to the 'parking' of passes, the BAA has advised that this is an essential security safeguard and

is applied if a pass has not been used at a BAA location for six weeks or more. All airlines whose staff are issued with BAA passes should be aware of this policy and the procedure for re-activating a pass, which is relatively simple but in some cases is not currently available on a 24-7 basis. If you are rostered to operate (or diverted) to another BAA location, which you haven't visited in the previous six weeks, ensure that your company is aware as early as practicable.

In the case of non-BAA UK airports that have featured prominently in recent **CHIRP** reports, we are seeking to raise awareness to the same issues among the relevant security managers with the assistance of the AOA.

## ENGINEER REPORTS

**Most Frequent Engineering Issues Received:  
12 Months to October 2008**



- Security**  
(Ground)
- Maintenance**  
(Line, Base, Repairs)
- Regulation/Law**  
(Compliance with)
- Procedures**  
(Use by Others, Adequacy, Existence)
- Company Policies**  
(Operational, Safety Reporting, Disciplinary/Grievance)
- Aircraft Technical**  
(Systems, Propulsion)
- Documentation**  
(Suitability/Adequacy)
- Environment**  
(Temperatures, Noise, Lighting)
- Licensing**  
(Engineering)
- Resources**  
(Manpower/Personnel, Tools/Equipment)

### INAPPROPRIATE USE OF UNQUALIFIED STAFF?

**Report Text:** An untrained, unlicensed technician was dispatched to replace a critical engine component on an AOG (Aircraft on Ground) aircraft by an engineering manager with the knowledge of the senior manager, both of whom are licensed type rated engineers.

The component was replaced without incident. As the crew had not tech logged the defect, no signature was offered and the technician left. A suitably qualified engineer had been available to carry out the AOG task.

The company also operates a similar principle in a non-EU destination, where a non-EASA licensed engineer frequently carries out work, on company aircraft.

Lessons Learned: Incident should be reported to CAA and investigated to ensure company does not continue this practice. While they are getting away with it they will continue it.

**CHIRP Comment: The Reporter's claims were referred to the CAA, who elected to conduct a review of the operator's maintenance practices. The CAA also offered the following comment:**

It cannot be denied that the critical engine component was changed and, without a CRS (Certificate of Release to Service) being issued by appropriately authorised staff, the aircraft flew illegally until such times as a CRS was issued. Additionally, if the flight crew were aware of the defect, the aircraft commander did not act in accordance with his licence holder responsibilities on two counts; firstly by not making a technical log entry, secondly by knowingly accepting an aircraft which did not have a legal technical clearance for further flight.

**With regard to the use of non-EASA licensed staff in non-EU Member States, this is permissible subject to certain requirements being met. The CAA's investigation into this aspect of the report showed that the appropriate procedures and requirements had been met.**

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## CERTIFICATION OF SAFETY CRITICAL TASKS

**Report Text:** On starting my night shift sequence, I was informed by Planning that an aircraft was due an 'A' Check two nights later. On duty for that shift was to be me - a B1 and B2 licensed engineer, and a Mechanic from another line station assisting. The 'A' check requires that the IDG oil and filters be replaced on both engines, with starter and engine chips to be inspected with Duplicate inspections and leak checks carried out on completion.

Although the aircraft is not operating ETOPS, nonetheless CAIP leaflet 11-21 Safety Critical Maintenance Tasks and Company Procedure, Control of Critical Tasks as per EASA Part 145.A.65(b)(3) still applies which states that; and I quote;

1. Purpose of this procedure is to ensure that no one person is required to carry out and inspect, in relation to a maintenance task involving some element of disassembly/re-assembly of several aircraft components of the same type fitted to more than one system on the same aircraft during a particular maintenance check. The purpose of this procedure is to minimise the rare possibility of an error being repeated where the identical aircraft components are not re-assembled, thereby compromising more than one system. *This procedure establishes a 'Twin Engine' Maintenance Policy and ensures consistency of approach across all twin engine aircraft inputs at line stations.*

145.A.65(b)(3). Simultaneous Maintenance Identical/simultaneous maintenance tasks on critical systems should be avoided whenever possible. This is required if there is a risk that the same maintenance error or

component failure in two or more systems could endanger the safe operation of the aircraft. Identical maintenance tasks should be carried out at different times, separated by at least one flight cycle. *Where it is not practical to introduce staggered maintenance, the use of separate work teams together with the accomplishment of appropriate function checks to verify system serviceability and integrity is required.*

This to me clearly states that I the B1 should not be carrying out the work on one engine, the mechanic carrying out the work on the other engine and then me signing for both. In addition to this it is also expected that I inspect both engine chip detectors, sign for the first part of the Duplicate Inspections, with the day shift B1 engineer (who has not seen the process take place) arriving on duty early the next morning and signing the second part of the Duplicate Inspection I have spoken to my base manager who could not see a problem, who then spoke to a member of the quality department who also could not see a problem.

The next day I rang my line manager who discussed it with the engineering manager and the quality manager neither of whom could see a problem as the plan was to carry engine runs out at the end, which they think would identify any problems, but as previously quoted: 'Where it is not practical to introduce staggered maintenance, the use of separate work teams together with the accomplishment of appropriate function checks to verify system serviceability and integrity is required.'

**Lessons Learned:** With all my years of experience in aviation, I am amazed that this is the course of action being taken. I feel extremely uncomfortable that I am being placed in what appears to me to be a potentially compromising situation for both myself as a licensed engineer and the company, not to mention the potential risk to customers. It is with this in mind that I am now questioning my years of experience and knowledge in aviation and the safety philosophy of maintenance and inspection that the CAA has driven into me over the years.

My Question is, "Am I right and they are wrong, or am I wrong and they are right!!!!"

A member of the Quality Department once said to me that there is not a problem when everything is OK but when there is an incident, how would you stand legally? The letter of the law is what is written down legally, not what you think is written down...

**CHIRP Comment: In respect of engines, maintenance organisations are required to have a maintenance policy regarding working on a multi engine aircraft detailed in their approved procedures and the company should make these readily available to the relevant staff. Typically they will describe the process to be followed in these general terms;**

- a) Maintenance will ideally be called on each engine at separate times, or
- b) Maintenance will be called on both engines simultaneously but carried out and certified by separate teams, or
- c) If the circumstances in (a) & (b) are not possible, then an engine run (usually at high power) to

establish serviceability is acceptable but is more critical in the clearance process

Ideally, the policy described in (a) & (b) would be followed as a matter of routine, however, when the operation requires a line station to carry out work not normally associated with their regular tasks then (c) would be invoked. If the tasks described by the reporter are routinely planned to be accomplished at a line station then it would be expected that the organisation should make provision for either (a) or (b) to be followed.

However, Part 145.A.65(b)(3) currently states that when only one person is available to carry out safety critical tasks then all task stages should be identified and then may be separately certified by the same person after completion of all the same tasks.

In respect of what is described in the report as a 'duplicate inspection', technically this does not apply to work such as replacement of magnetic chip detectors, as it is only possible to carry out a 'secondary' check to ensure that the plug is correctly located; both the fitment and verification is carried out by competent staff, usually suitably qualified Cat A mechanic level CRS in some companies. To assist in overcoming the situation described by the reporter, some companies have elected to train the Cat B2 CRS line engineer to carry out cat A level tasks, provided of course they have firstly gained a cat A licence. Either solution satisfies the EASA requirements for independent verification checks.

The issue was discussed with the company Quality Manager; he readily agreed to review the twin engine maintenance policy and procedure to provide clarity with requirements, and to review the misleading reference to the need for a duplicate inspection rather than a location integrity check.

### COMPATIBLE - SAYS WHO?

**Report Text:** The Quality Auditor (QA), an LAE, went to the stores to collect an inner tube for fitment with a tyre from a US manufacturer. The inner tube in stock was supplied from an EU manufacturer.

The QA doubted the applicability for fitting the tube with the tyre and queried it with the Chief Engineer (CE). The CE advised that he too had been in some doubt regarding the suitability of the tube for fitment with the cover and had checked with the supplier, who had advised that, according to the tyre manufacturer, the replacement tube was suitable.

As there was still some doubt, another specific query was sent to the supplier from the CE, this resulted in a repeated quotation from the US manufacturer's catalogue regarding the acceptability of the applicable data.

The QA then contacted the EU manufacturer's Technical department direct. They stated that the inner tube was only to be fitted with a specific tyre size, although they did manufacture tubes for the tyre size quoted. The European company also stated that they were aware that the US manufacturer had issued instructions stating the tube to be satisfactory for multi applicability with their product, but this was incorrect

From subsequent information sourced from the US, the number one cause of warranty claims arising from tyre failure is the incorrect matching of tube and tyre size.

The QA contacted the supplier and quoted the EU manufacturer's Technical response, the supplier was advised that the US manufacturer's technical data seemed inappropriate for the European manufacturer's product.

The supplier responded with an apology that they had been mistaken to use the US manufacturer's Technical data to support the EU manufacturer's supplied parts; they undertook to replace the incorrect tube and assured that measures had been put into place to prevent similar mistakes being repeated.

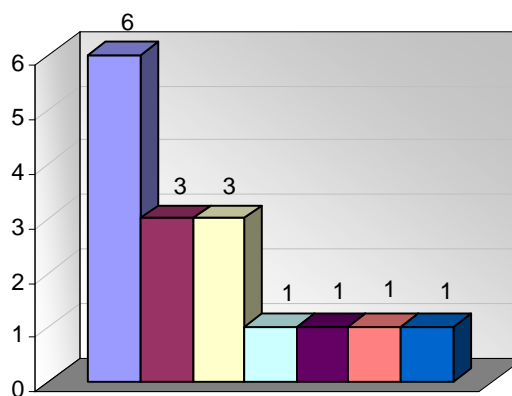
**CHIRP Comment:** Although this type of installation is normally found on smaller aircraft, this report is a good example of how an engineer's experience and vigilance prevented an unapproved part being fitted and possibly averted a potentially serious tyre failure.

The approved data issued by the airframe manufacturer should determine the compatibility of alternative parts, despite the possibility that a component could be used on a variety of different installations.

The reporter's concern that the US manufacturer's technical advice on compatibility was at variance with that of the EU tyre manufacturer was represented to the CAA.

## ATC REPORTS

Most Frequent ATC Issues Received  
12 Months to October 2008



- **Communications - External**  
(Pilots)
- **Air Traffic Management**  
(Separation)
- **Duty**  
(Length, Rest)
- **Airports**  
(Runways, Bird Control, Infrastructure)
- **Company Policies**  
(Responsibilities, Operational, Disabilities)
- **Relationship Management**  
(Planning, Managers, Delegation)
- **Security**  
(Ground, In-Flight)

## IN THE LINE OF FIRE?

**Report Text:** We are a group of controllers at a small regional airport that is surrounded by private agricultural land. Over the past several years, there has been a game bird shoot every summer, continuing until the following February, which takes place within the vicinity of the aerodrome encompassing the final approaches and climb-out areas.

Every year as a unit we have submitted a report raising our concerns with regard to the shoot to the aerodrome authority, requesting guidance over the procedures we should adopt. The aerodrome authority have yet to provide any direction, thus we are left 'in limbo' to make our own decisions with regard to operational safety. The aerodrome authority continues to point out that the land owner has 'grandfather rights' in connection to game activity on his land, and there is nothing the airport can do as there appears to be no legislation in place even with reference to the Air Navigation Order (ANO).

It seems ridiculous that such shoots should be allowed to continue when this aerodrome has military firing ranges in close proximity, which have 'Danger Area' status. The routing for aircraft inbound is such as to avoid these areas, yet the aerodrome authority allows aircraft to proceed on the ILS even though shoots are known to take place (we are not always advised of their movements until they are observed in the fields).

Our concerns with regard to the shoot are the paramount safety of aircraft using the airport, these include:

- a) Crops being grown in the vicinity of the aerodrome, specifically to attract feeding birds
- b) Breeding pens located close to the aerodrome boundary
- c) During the shoot, 'beaters' forcing birds to become airborne without due regard to our traffic situation
- d) Dogs accompanying the shooting parties not on leads which could cause a safety issue should they stray airside
- e) Rights of access across a live aerodrome/apron by the shooting party, including dogs and live firing weapons
- f) The possibility of a 'shooter' aiming at an airborne bird whilst an aircraft could cross his point of aim.

Our overriding concern is for the safety of the aircraft we work with and we feel that our worries with regard to this situation have not been adequately recognised by the aerodrome authority. We have been trying to resolve the issue for the past four years and feel that this is the only avenue left open to us.

**CHIRP Comment:** With the reporters' consent, we represented their concerns directly to the airport authority. The airport manager confirmed that organised shooting was being conducted on private land outside the airport's boundaries. The airport management was working very hard to stop the shooting activity around the airport; in the meantime, the airport management was working with the shoot organiser to keep them as far away as possible from the airport boundary. The response stated that the

shooting activity had never hindered the safety of the airport's operations and that the reporters' concerns were exaggerated.

After considering the reporters' concerns and the management response, the Air Transport Advisory Board recommended that CAA (SRG) be advised of the concerns and be invited to assess the adequacy of the airport authority's actions in mitigating the risks arising from these activities.

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### DIRECT TO VS OWN NAVIGATION - A COMMENT

**Report Text:** I have just read your article "Direct To vs Own Navigation" and I think there is some need for clarification.

"Direct To" is not an alternative to placing an aircraft on a radar heading. A radar heading is most often used to ensure separation from other aircraft and "Direct To" would not be acceptable in these circumstances. "Direct To" is mostly used on first contact when a routeing is issued to an aircraft and should be interpreted as, "Route directly from your present position to the point specified". It might also be used to position an aircraft, e.g. for sequencing,

"Own navigation" is primarily used after an aircraft has been placed on a heading which is no longer required and the instruction is to, "Resume own navigation XXX" or, "Own navigation XXX".

**CHIRP Comment:** The above comments are essentially correct but, as was noted in the last issue, neither instruction is precisely defined in either the Manual of Air Traffic Services - Part 1 or CAP403 - Radiotelephony Manual. It is anticipated that the review by the CAA RTF Phraseology Working Group will resolve this matter.

## CAA (SRG) ATSINS

The following CAA (SRG) ATS Standards Department ATSINS have been issued since July 2008:

**Number 136 - Issued 5 August 2008**

Department for Transport Consultation on the Extension of the European Aviation Safety Agency's Responsibilities to Aerodromes, Air Traffic Management and Air Navigation Services

**Number 137 - Issued 21 August 2008**

Wake Turbulence Separation Requirements for the Airbus A380-800

**Number 138 - Issued 22 August 2008**

Entry into Force of European Union (EU) Regulation No. 482/2008 Establishing a Software Safety Assurance System to be Implemented by Air Navigation Service Providers Amending Annex II to Regulation (EC) No 2096/2005

**Number 139 - Issued 1 September 2008**

OFCOM Consultation - Administration Incentive Pricing

**Number 140 - Issued 15 September 2008**

Introduction of RNAV (GNSS) Instrument Approach Procedures

**Number 141 - Issued 15 September 2008**

Avoiding Action - Guidance to Air Traffic Controllers

**Number 142 - Issued 19 September 2008**

CAP 670 SW 01 Acceptable Means of Compliance with EU Regulation No. 482/2008 for Commercial Off The Shelf (COTS) Equipment with Integrity Requirements No More Onerous than 10<sup>-4</sup>

**Number 143 - Issued 13 October 2008**

CAP 493 Supplementary Instructions

CAA (SRG) ATS Information Notices are published on the CAA (SRG) website -

[www.caa.co.uk/default.aspx?categoryid=33](http://www.caa.co.uk/default.aspx?categoryid=33) and click on the link 'Search for a CAA Publication'

## GA REPORT

### CANCELLED CLEARANCE

**CHIRP Narrative:** The following General Aviation report has been included as it has obvious ATC implications:

**Report Text:** My wife and I intended to fly from HHH to Southern Europe. I was cleared Special VFR to the Zone boundary not above 1,000' on the QNH, and after a short hold for wake turbulence to clear from the previous twin turboprop departure, I was cleared for take-off.

There was some low cloud in the vicinity of the airfield, but I was not worried as I had heard one of the club instructors telling a colleague that there was a bit of cloud to the south, but it wasn't a problem elsewhere. As I climbed out, I heard the tower tell the following aircraft that the weather had dropped below Special VFR minima and he was to return to the Aero Club parking area.

I was then amazed to hear that my Special VFR clearance was cancelled and I was to return to land immediately. At the time I was levelling at 1,000' in VFR conditions with good surface contact - it briefly crossed my mind to ask if I could continue my flight, but I decided to follow the Tower's instruction. However, as I turned downwind to land I could not avoid flying into a layer of cloud, which appeared to have a base of 400' and tops 1,500-2,000'. I immediately went onto instruments, and advised the tower that I was now IMC and that I was not IMC rated. There was a pause before they asked if I would accept vectors to finals.

I was more than willing to accept any assistance! I was told to turn to a heading of 120 degrees and climb to 2,000'. As I came round to the heading I broke out of cloud. I estimate that I had been in cloud for about 1 to 1½ minutes. I realised that a climb to 2,000' would put me into another layer, so I advised the tower that I would not accept the climb as I was clear of cloud and in sight of a familiar area on the ground - I asked to continue the turn towards finals and spotted the runway below another layer of low cloud. As I came onto my final approach heading the cloud again obscured the runway briefly, but I was able to complete the approach and land successfully.

I consider that I should not have accepted the ATC instruction to return to land as the area in front of me after departure was VMC, with a visibility in excess of 10 miles and I was well clear of cloud and in sight of the surface, even if the airfield was below limits.

Lessons Learned: Accepting the highly unusual cancellation of clearance when airborne and ATC instruction to land immediately, took me from a relatively safe flight into a highly dangerous situation outside my experience. It jeopardised my aircraft, endangered life and frightened my passenger sufficiently that she did not want to continue the flight even when the conditions improved. In the event of a similar cancellation of clearance I would advise ATC that I was not able to comply with their instruction if it jeopardised my flight.

**CHIRP Comment:** The cancellation of the Special VFR clearance by ATC would have been appropriate if the reporter was awaiting departure. However, once airborne the instruction to return to land should not have been issued and in the particular circumstances could have led to a much more serious outcome. The pilot should have been advised of the weather deterioration at the airport and asked what his intentions were.

Many GA pilots would be reluctant to challenge an ATC instruction particularly within Controlled Airspace, but this report serves as a useful reminder to both pilots and ATCOs that the pilot is ultimately responsible for the safety of the aircraft and may elect to decline an ATC instruction, if the circumstances justify such a course of action.

## CABIN CREW REPORTS

### FLIGHT OPERATED WITH NO IN CHARGE

**Report Text:** We operated a flight from our UK base without an In Charge crew member. A junior member of cabin crew was used as the In Charge.

This is not permitted by our Operations Manual as junior crew have not completed the additional SEP that senior crew are given. This also happened a couple of weeks ago on a UK domestic flight also departing from a company base.

The company breaks rules in order to crew aircraft regardless of the negative impact on safety.

**CHIRP Comment:** The policy regarding senior cabin crew members was referred to the CAA, who advised:

"A senior cabin crew member must be carried when the crew complement is more than one. This senior cabin crew member must have at least one year's experience and have completed an appropriate course. If the senior becomes unable to operate, then it is acceptable for the next most qualified cabin crew member to operate in their place.

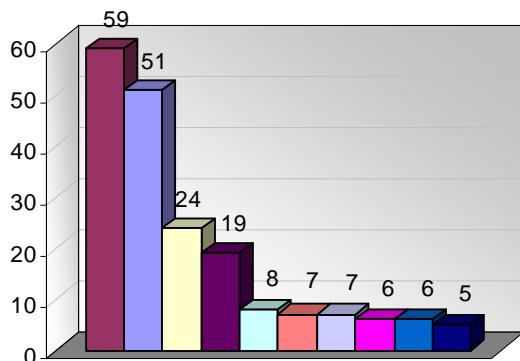
The procedure for this should form part of the Operations Manual and should be acceptable to the CAA. This should only take place away from base, or in flight, where a suitable replacement cannot be made available."

The reporter's concern was represented to the operator; as a result of this and other similar incidents the

wording of the company's Operations Manual has now been clarified and communicated to both cabin and flight crew.

## FLIGHT CREW REPORTS

**Most Frequent Flight Crew Issues Received:  
12 Months to October 2008**



- Security**  
(Ground)
- Duty**  
(Rosters/Rostering, Rest, Length, Crewing, Disruption)
- Communications - External**  
(ATC, Regulators/Government)
- Company Policies**  
(Absence, Operational, Safety Reporting)
- Procedures**  
(Use by Others, Adequacy, Use by Reporter)
- Pressures**  
(Commercial, Domestic, Management)
- Air Traffic Management**  
(Separation)
- Ground Handling**  
(Taxiing)
- Handling/Operation**  
(Aircraft Handling by Crew, Airmanship)
- Aircraft Technical**  
(Systems, Propulsion)

### LOSS OF COMMUNICATIONS PROCEDURES - A COMMENT

**Report Text:** I just wanted to contact you to say how much I agree with the well-considered and written report in Issue 85 concerning the need to simplify the radio failure procedures.

As a captain flying short-haul services around Europe for a major airline, I whole-heartedly agree that current ICAO procedures with all sorts of variations in different States are far too complicated. In a high workload situation that would result from a loss of communications, I suspect that there would be few crews who would get the procedure right as it is currently written.

I am pleased to see the CAA proposes to undertake a review of this subject and hope they succeed in simplifying things!

**CHIRP Comment:** Following the Air Transport Advisory Board discussion of the original report in January 2008, the CAA elected to review the Loss of Communications procedure. It is understood that a risk assessment from a flight crew perspective has

been completed; a similar exercise from an ATC perspective is yet to be undertaken.

### RTF PHRASEOLOGY "ON TRANSITION....."

**Report Text:** I am concerned that a (as far as I am aware) non-standard phrase is becoming very much standard within the UK, and another different phrase in Spanish airspace.

UK ATC are increasingly saying, "On transition make the speed 280 knots (say)", meaning that when changing from Mach to IAS this speed should be maintained.

Well, of course we ALL know what they mean don't we? I'm not so sure. Does someone who's only English is aviation English understand transition to refer to anything other than TA or TL? Call it pedantic of me, but I think there's a potential for confusion and this 'custom and practice' should stop.

**CHIRP Comment:** The use of the phrase "On transition....." has become more frequent since the introduction of a trial at the request of airlines to standardise descent speeds for arriving aircraft for environmental and cost considerations.

This matter had been raised previously through CHIRP and, at that time, the CAA confirmed that the terminology was acceptable. However, with the likely increased use, for reasons including that given in this report, the matter has been referred to the CAA RTF Phraseology Working Group to agree a standard phrase that can be adopted throughout the UK and also recommended to ICAO for wider use.

### "MAYDAY/PAN" PHRASEOLOGY

**Report Text:** In the simulator, after pilots declare a MAYDAY/PAN, many then modify their call sign to include the prefix MAYDAY/PAN with their call sign on subsequent RTF calls (e.g. FASTAIR 123 becomes MAYDAY FASTAIR 123).

I cannot find a reference to this in CAP 413, and no pilot has yet supplied me with a reference except to say, "That was what I was taught X years ago".

Although this item is not really a CHIRP issue, I would appreciate it if you could supply an answer.

**CHIRP Comment:** As the reporter notes, this point is not covered currently in the Manual of Air Traffic Services - Part 1 or CAP413. Some of us with long memories recall that the practice of adding the relevant prefix when making the first call after a change of RT frequency to alert other aircraft was encouraged, but was it ever taught formally? Any thoughts from others with similarly long memories?

Also, a reminder - most pilots are aware that, time and circumstances permitting, a MAYDAY message should commence with "Mayday - Mayday - Mayday", but were you aware that the correct initial call for a PAN situation is "Pan Pan - Pan Pan - Pan Pan"? (CAP 413 Chapter 8 refers).

### CONFUSED AND RUSHED

**Report Text:** Initial ATC clearance was obtained from ### (Indonesia) for FL400 routing Singapore. On lining



up for takeoff the clearance received was "Runway heading, 2,000ft".

We attempted to clarify whether he wanted us to maintain 2,000ft on reaching or continue with the SID but all we got was a repeat "Runway heading, 2,000ft" plus an instruction that we must commence the takeoff as there was an aircraft on finals. We took off and levelled at 2,000ft, the Minimum Safety Altitude in that direction; visibility was good in the dark. We took it upon ourselves to turn right and follow the SID, as this seemed to be the most logical thing to do under the circumstances.

The next ATC instruction was "Cleared two four zero zero". Initially we mistook this as 4,000ft and initiated climb. Attempts to clarify whether he had actually meant 2,400ft or FL400 or 4,000ft only received a repeat "Cleared two four zero zero". Again an attempt at clarification with the same result, so we descended to 2,400ft, which was below the MSA. We could see the lights of other aircraft at relatively low levels but were unable to determine accurately how they related to us. We then received a frequency change and were cleared to climb to "Flight Level four zero zero".

All of this confusion could have been avoided by the use of correct R/T phraseology. As far as we were concerned the takeoff clearance was actually to maintain runway heading and 2,000ft but what the controller appeared to want was for us to climb to that altitude on runway heading and then pick up the SID, presumably continuing our climb to FL400. The subsequent confusion over climb clearance could have been avoided altogether by including the words "Flight Level".

**CHIRP Comment:** This incident, which led to the crew operating at night below the Minimum Safe Altitude ticks many of the boxes for a CFIT accident and is a salutary reminder of the importance of using standard RTF phraseology. If unclear about an ATC instruction and unable to get a clarification, ensure the safety of the aircraft.

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## SECTOR FUEL - RELEARNING AN OLD LESSON?

### (1)

**Report Text:** The company (UK AOC holder) has reintroduced Fuel League Tables. The company claim that it should not affect fuel decisions BUT I have now observed on numerous occasions how it does affect fuel decisions.

It puts unnecessary pressure on Captains knowing that they will be INTERVIEWED if they carry more than flight plan fuel regularly.

THIS IS AFFECTING FLIGHT SAFETY.

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### (2)

**Report Text:** My company (non-UK operator) has recently issued a memorandum regarding the carriage of extra fuel. Whilst the points in the memo seem to be based on logic and facts, on closer inspection it could be argued that the document paints a best case scenario picture.

On many occasions, I have encountered thunderstorms covering large areas en route and in the vicinity of destination/alternate airfields, which have not appeared anywhere in the TAFs (Aerodrome Forecasts) or significant weather charts for the period. Relatively often, updated TAFs and METARs are not provided (handling agents just say that they don't have time to get fresh weather, or that the computer system is down).

On two occasions recently, I have encountered large areas of thunderstorm activity. One of which was not mentioned in the TAFs and METARs for any airport in the South East of England when we departed, but led to a very significant en route track deviation followed by holding due to the effect that the storm had on the traffic flow in the area.

In the second case, I was re-routed by ATC due to thunderstorms; the extra fuel burn caused by this was well above the figure permitted in the company memo. Although I knew about the area of weather having flown past it on the way in, the company memo states that taking extra fuel for en-route weather is not acceptable.

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### (3)

**Report Text:** I feel that I should submit this report if for no other reason to try and reinforce an old lesson that has recently been subject to commercial pressure due to high fuel prices.

Due to a maximum take-off weight limitation, it was necessary to balance payload and fuel uplift for the return sector to the UK. This led to us departing at maximum take-off weight without some passenger bags and with a fuel load that on paper could not achieve a non-stop flight to AAA (major UK airport); we had selected an en route alternate and had run flight plans for both sectors. Overhead our en route alternate, the fuel remaining allowed a continuation to our UK destination with 200kg above min fuel (destination plus diversion to BBB). All was well!

Received ATIS for AAA prior to descent and told to expect a runway change shortly from westerly to easterly. Thus we now expected about 10 mins holding at XXX. Still OK; as weather allowed me to burn down to final reserve fuel and we already had about 5 mins holding before that decision would have to be made at XXX. Arrived at XXX and told "less than 15 mins in hold".

Weather checked; effectively an EAT had been given; therefore, all company criteria had been met. I took the decision to remain in the hold until the point was reached to leave hold with a planned landing fuel of my final reserve.

After 18 mins, still in hold; no diversion now possible due to several go-rounds at AAA due to tailwinds on finals! Other aircraft now on frequency, stating, "In the event of a go-around we will be fuel emergency". We were likewise. We eventually landed OK but many other aircraft were airborne in the same boat; it could have gone pear-shaped very rapidly. We landed in full compliance of all CAA rules.

Previously in a similar situation only an occasional aircraft would be tight on fuel; on this occasion I feel

that, having listened to the intonation on those pilots R/T calls, we all were.

Lessons Learned: The recommended 20 mins hold expectation should be broken at one's peril. Massive company pressure to carry only sector fuel sounds great from an accountant's viewpoint. However, if we are all running to these limits regularly, a simple runway change, which in retrospect was not sensible and caused several go-arounds (due to excessive tailwinds on finals causing stabilised approach criteria to be breached), can lead to a potentially serious situation.

On occasions aircraft may arrive tighter on fuel than ideal but they should be relatively few. After this occurrence, I feel that there are many now in the same boat out there on a daily basis. How would the ATC Director react to several aircraft declaring fuel emergencies simultaneously?

A final point: ATC in US regularly require aircraft taking off to accept a tailwind for departure. With LHR having approx 12,000 ft TODA and no real temperature problems possibly landing traffic might merit higher priority as they are airborne with finite fuel reserves.

**CHIRP Comment:** A policy of monitoring sector fuel loads/burns is not in itself unreasonable given the significant proportion of operating costs that fuel now represents. However, where such a policy is managed in a way that dissuades an aircraft commander from uplifting a reasonable amount of Extra Fuel for a specific reason, it could lead to a culture among the pilot community that the Computer Flight Plan fuel will be sufficient to take care of all eventualities, even those that might be reasonably foreseen prior to departure.

**Recommendation 3 of the CAA Special Objectives Check (SOC) - See Page 1 - addressed this point:**

Page 6; Para 5.2.6 Recommendation 3: Operators should review their fuel policies to ensure that, as interpreted by fleet managers, training and line pilots, these do not result in a perception that aircraft may be permitted to depart with fuel amounts less than must be calculated in accordance with formulae specified in the operations manual (or equivalent document). Where such formulae are known not to address all circumstances that can reasonably be foreseen, pragmatic guidance should be specified to ensure that appropriate adjustments are made. This review might be managed through a schedule applied by the Operations Quality Manager so as to ensure that company policy endures with time.

**The CAA SOC also addressed the issue of delays:**

Page 4; Para 4.3.4 Recommendation 2: Operators should review their fuel policies to ensure that adequate provision is made either through their computer programs or by adjustments made by aircraft commanders or dispatchers (acting in accordance with guidance or instructions specified in operations manuals) for the Trip Fuel to include, where appropriate, fuel for use in holding prior to commencing the approach when there is reason to believe that this will occur. An example of such circumstances can be found in AIC 36/1998 (Pink 170). [As noted on Page 1 the AIC has been recently reissued.]

Whilst an operator might elect to use day-to-day arrival delay statistics to justify not complying with the current AIC recommendation for entry into UK airspace, it should be remembered that two of the major UK airports in Southeast England have only single runways. Some of you might remember the challenge presented to the UK ATC system in the wake of the extended closure of Stansted Airport following the Korean Airlines B747 accident. Those operators who elect not to carry the recommended holding fuel for entry into the UK might wish to reflect on the effect of a runway closure or similar disruption to the inbound traffic flow when risk assessing their sector fuel policy.

Also, a reminder - in a situation similar to that in report (3) above, there is no benefit in forewarning ATC of an impending low fuel situation. ATC will only react to a PAN/MAYDAY; otherwise equal priority will be given to all other aircraft.

The SOC contains other useful information on the topic. For those interested, a copy is posted on the CHIRP website at [www.chirp.co.uk](http://www.chirp.co.uk).

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## SOP CHANGES

**Report Text:** This fleet is supposed to be "ring-fenced" so far as SOPs are concerned but the new company has chosen to implement a sequence of changes, communicated via CD-ROM and Notices to Crew.

There has been absolutely no formal training, no classroom sessions, no line training and consequently, every day that I have reported for work during the past several weeks, the flights have proceeded safely only because of the professionalism of the crews, backed by our willingness to get things done. But every single day has involved a negotiation pre-flight about how things would be conducted, necessitated by the inherent ambiguities in the information that has been promulgated.

I would like to know how the CAA has sanctioned a situation where SOPs are being decided on a flight-by-flight basis - surely one of the cornerstones of safety in this industry is that everyone in the flight deck knows what everyone else will do in an emergency. At present, services on this fleet are being operated in an ad-hoc fashion and I am appalled that the Authority has sanctioned such a situation. I am now beginning to understand the ethos of the new organisation, the essence of which is to spend the least amount of money in every department. I can accept this for the most part, but when it starts to affect the operation of the aircraft by flight crew, I really think that it has been allowed to go too far.

Does the CAA actually care about this, or does it simply let it go because we have "ticked all the boxes".

**CHIRP Comment:** The reporter's and other similar concerns were represented to CAA (SRG) and subsequently discussed directly with the operator.

The operator's plan for integrating the fleet had been validated by a risk assessment and the SOP changes had been assessed in a flight simulator, overseen by the CAA. Each stage of the progressive integration was subject to monitoring by the operator.

The concerns reported to this Programme were not apparent from the company's monitoring processes or company safety reports. Notwithstanding this, after being advised of the concerns, the company issued a further communication to pilots inviting their feedback to managers and reinforced its monitoring of line operations.

The issues arising from integrating airline operations following a merger/acquisition are often very complex for management, as any rationalisation must be planned and implemented with the minimum disruption to business; they also present unusual challenges for the CAA in auditing the transition. One important issue is addressing any significant difference in the organisational culture between airlines and the difficulty that some individuals experience in accepting and adapting to change; this is one of the reasons that most if not all companies confirm a new pilot's ability to comply with company SOPs in simulator/line training before releasing him/her to line operations. It is interesting to note that in this instance the CAA endorsed the company's proposal that the SOP changes could be introduced effectively to all pilots without formal training, in spite of seemingly significant cultural differences in this fleet's operating standards.

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### TAXIWAY MARKINGS - LHR

**Report Text:** I wish to report the extremely complicated taxiway markings at LHR. These have now been made additionally and unnecessarily complex since T5 has gone live. I have queried this with ATC and they have told me the structure of the markings is due to 'historical reasons'. This is not in my opinion a reasonable position.

The current central area/northern taxiway marking system revolves around having two loops; Alpha and Bravo. This was fine when the airfield was much simpler but it is now completely different from the originally designed 'inner and outer' layout and this 'logic' no longer makes any sense whatsoever on the ground.

From certain areas in T5 such as the domestic stands you now have to route onto Alpha or Bravo via a 'link' although this means just taxiing straight ahead. Eventually we may learn to live with this as we have previously at LHR but it is an unnecessary complication at a very busy airfield. So far I have heard a number of mistakes made as aircraft have taxied the wrong way around the loops - the instructions were such as "On Alpha, hold short of Echo" but as Echo intersects Alpha twice, once at the top and once at the bottom, the direction taken was easily open to misinterpretation and the wrong direction was taken.

The easiest system it seems to me would be to rename all taxiways according to their direction with links where necessary between them. For example if all East-West taxiways were Alpha, Bravo, Charlie etc and all North-South taxiways were X-Ray, Yankee and Zulu then to pilots taxiing and I'm sure to ATC, instructions would be easier to issue and to understand.

For example to get to the hold today I was told to go "South on Alpha, 180 degree left at link 55, North on

Bravo, link 58, East on Alpha hold short of Echo". That's a lot of unnecessary talking in my opinion if you look at what I've been asked to do on the taxi chart. Especially when these calls are being made hundreds of times per day. The confusion arises in my opinion because:

- a) 'North on Bravo, link 58' relates to a straight line and on the ground it is completely unapparent that Bravo is a loop taxiway that you are leaving and,
- b) because you are being told to go first South on Alpha then East on Alpha.

In the above example my method would give you something like "South on Alpha, 180 degree left at link 55, North on Bravo, East on Zulu, hold short of Echo". If you look at them both I think it's clear which is shorter and which is clearer. Perhaps the current system looks clearer to someone who has a map with the loops highlighted on it but that's of no help when you're taxiing around. I appreciate some areas of LHR don't lend themselves to the simplicity of this idea but that is no reason not to make other parts of the airfield clearer and easier to operate on.

We struggle at our home base and in our mother tongue. How some of the foreign operators manage at an unfamiliar airfield in a foreign language at a poor time on their body's circadian rhythm I don't know? If you listen to the pilot readbacks there is always a longer than usual pause as pilots try and figure out where they should be going and I don't put this all down to unfamiliarity. These systems should be simple enough to enable us to envisage them after a short period of familiarisation at one's home base without constantly resorting to the books. We are after all making the same routes daily.

Please could some simplification be made even if this means old historical designations are lost and the markings completely revised?

**CHIRP Comment:** The reporter's comments were represented via NATS to the General Manager ATC LHR, who advised that he welcomed feedback on runway/taxiway safety issues and had established a process by which such issues will be reviewed by a multi-discipline runway safety team; he also advised that the specific points in this report have been discussed with BAA.

If you have any safety-related comments on the topic, submit a company report/MOR and request that it be made available to the relevant ATC manager.

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### THREE-PILOT OPERATIONS

**Report Text:** Over the last several years my company has increasingly made use of a third pilot for certain long haul sectors, in order to alleviate the normal Flight Time Limitations constraints on two pilot operations.

The Operations Manual makes no specific requirement for the third pilot to play any part in the operation of the flight and gives no guidance on how, if at all, he or she should be utilised. Since this pilot is not being used to provide in-flight relief for either of the operating pilots, no arrangements are made for he or she to sit anywhere other than the flight deck observer's seat. In some of our aircraft these are conventional upright seats, rigidly

fixed to the bulkhead. They have very thin cushions and become excruciatingly uncomfortable on sectors of long duration, such as those to Central America and the Caribbean.

Scheduled carriers that use cruise pilots do so for the express intention of relieving pilots from their flight deck duties and provide either crew rest areas or passenger seats screened off from fare paying passengers. My company offers no such opportunity and frowns upon the use of vacant seats to escape the cockpit. In any case it is unacceptable to sit in close proximity to passengers; they do not like it and will normally pester any pilot attempting to take rest in the cabin. It is indefensible that airlines are permitted to operate in this fashion.

There can be no scientific basis for this practice and it is quite extraordinary that the Regulatory Authority is prepared to sanction it. I call upon the CAA to re-examine this practice and either end its use or dramatically curtail it.

Several charter operators are increasingly relying on long haul operations to supplement the flagging short haul end of the business. The B787 will soon be brought into service with UK operators, some of whom have not declared their intentions regarding in-flight crew rest areas. My fear is that they will initially bring the aircraft into service without such areas, on the premise that it will receive a shake-down on the existing short and long haul sectors and therefore need not be operated any differently from current fleets. They will almost inevitably move on to serve predominantly long haul destinations and by stealth and deception, and with the support of a compliant Authority, press for and receive dispensation to continue to operate without the provision for proper rest areas.

**CHIRP Comment:** We have sought to clarify the basis for the use of this FTL alleviation in the manner described above on several previous occasions. It had been our understanding that the CAA was contemplating a clarification of the use of a third pilot along with several other FTL matters; however, we have been recently advised that this is not now the case.

**In the absence of appropriate rest facilities and/or an Operations Manual procedure for sharing the flight deck duties, it is difficult to conclude that this practice achieves anything other than three tired pilots being on the flight deck, as opposed to two.**

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## CABIN REST

**Report Text:** On an Inbound long haul sector my pilot colleague and I, together with the cabin crew were deadheading back to base in the cabin after operating the outbound sector that morning.

We were not operating as it is impossible for a single crew to operate such a long two-sector flight within the scope of the current Flight Time Limitations.

Seats usually sold as 'extra legroom' seats had been set aside for my colleague and I to sit in on the way home, but my colleague elected to sit on the jump seat in the cockpit for the initial part of the journey, thus the adjacent seat was apparently 'vacant'.

A very rude and disgruntled female passenger, who had noticed the 'spare' seat, repeatedly complained that she should be allowed to sit there due to her height (she was quite a tall lady). It was explained to her in very polite terms by the operating crew that unfortunately the seat, although apparently vacant, was reserved for crew use, and that she had not paid for an extra legroom seat. After noisily complaining to all around her who would listen, she then took it upon herself to ignore the crew's advice and lowered the rearward facing crew seat, proceeding to sit there with her feet up on the seat adjacent to me. Once again, the crew explained the situation and asked her to move back to her seat, and once again a scene was created.

This happened twice, however on the second occasion a male passenger sat in the seat immediately behind me began, every so often, to give the back of my seat a very hard 'wrench' every time he left his seat, in apparent retribution against me. To solve the situation my colleague came back and re-occupied the seat; this calmed the two passengers.

My point is this: had I been positioning on the outbound sector in order to operate the inbound sector, I would have arrived insufficiently rested and possibly too stressed to perform my duties safely. It is all but impossible, with passengers constantly 'stretching their legs' in the adjacent door area, when coupled with incidents of this nature, to obtain adequate rest when positioning outbound.

**CHIRP Comment:** The practice of further extending a Level 2 Flight Duty Period Extension by using more than one crew was not envisaged when the Level 2 Variation was sanctioned by the CAA and no guidance has been promulgated in its use in this manner.

**The practice assumes that the crew positioning in the passenger cabin outbound is more rested than the operating outbound crew. This is not an unreasonable assumption where it is possible to offer the positioning crew members the opportunity to rest; however, where the positioning crew members are seated in the main cabin of a holiday charter flight, it is open to question whether the cabin environment offers any advantage over that of operating in an advanced flight deck..**

**A review of the justification for the use of Level 2 in this way is long overdue.**

---

## IT'S ALMOST THAT TIME OF YEAR AGAIN

**Report Text:** On landing at a fairly large UK regional airport, we vacated the runway to see a twin propeller type being loaded with freight. The crew and I noticed that the aircraft was covered in a heavy frost. There was no sign of the aircraft being de-iced.

We taxied to stand and noticed the aircraft had started engines. I called ATC to inform them that the aircraft was covered in frost. Shortly afterwards the aircraft requested taxi and subsequently took off.

Subsequently, I queried the situation with the operator; they advised me that was their normal procedure.

**CHIRP Comment:** FODCOM 19/06 remains extant and contains advice on winter operations; this includes the statement, 'Operators should remind flight crew of the

need to keep the aircraft surfaces free from frost, ice, slush and snow unless otherwise permitted in the aircraft flight manual.'

## CAA (SRG) FODCOMS

The following CAA (SRG) FODCOMS have been issued since July 2008

### 29/2008

Letter of Intent: Proposal to Amend the Air Navigation Order 2005. Proposal for the Amendment of the Air Navigation Order 2005 Article 25 to Change the Crew Composition Requirements for Helicopters Flying Under and in Accordance with the Terms of Police Air Operators Certificate

### 30/2008

Letter of Intent: Proposal to Amend the Air Navigation Order 2005. Proposal to Amend Articles 42 and 155 and Schedule 9 of the Air Navigation Order 2005 for the Purpose of Introducing an Additional Responsibility for Operators of Helicopters Conducting Offshore Flights, Including the Support of Oil and Gas Exploitation Within the United Kingdom Continental Shelf Airspace, New Definitions and an Additional Requirement to be Included in the Operations Manual

### 31/2008

Training for Ground De-icing and Anti-icing of Aircraft

### 32/2008

Publication of EU-OPS in the Official Journal of the European Union

### 33/2008

Winter Operations

### 34/2008

Introduction of Safety Management Systems (SMS) by AOC Holders and Maintenance Organisations

### 35/2008

Operator Audits of Ground Handling Service Providers - Impact of IATA Safety Audits for Ground Operations (ISAGO) Programme

### 36/2008

JAA Accountable Manager and Nominated Postholder Training Courses

### 37/2008

A Partnership in Safety Conference - 29 January 2009

CAA (SRG) Flight Operations Department Communications are published on the CAA (SRG) website - [www.caa.co.uk/default.aspx?categoryid=33](http://www.caa.co.uk/default.aspx?categoryid=33) and click on the link 'Search for a CAA Publication'

If you would like to contact the CAA Flight Operations Inspectorate or report safety matters which are outside the scope of the MOR Scheme, you can do so by e-mailing them at: [flightoperationsafety@caa.co.uk](mailto:flightoperationsafety@caa.co.uk)

## CHANGED YOUR ADDRESS?

If you receive FEEDBACK as a licensed pilot/ATCO/maintenance engineer please notify Personnel Licensing at the CAA of your change of address and not **CHIRP**. Please complete a change of address form which is available to download from the CAA website and fax/post to:

Civil Aviation Authority  
Personnel Licensing Department  
Licensing Operations  
Aviation House  
Gatwick Airport South  
West Sussex RH6 0YR  
Fax: 01293 573996

The Change of address form is available from: [www.caa.co.uk/docs/175/srg\\_fcl\\_changeofaddress.pdf](http://www.caa.co.uk/docs/175/srg_fcl_changeofaddress.pdf)

Alternatively, you can e-mail your change of address to the following relevant department (please remember to include your licence number):

Flight Crew ..... [fclweb@caa.co.uk](mailto:fclweb@caa.co.uk)  
ATCO/FISO ..... [ats.licensing@caa.co.uk](mailto:ats.licensing@caa.co.uk)  
Maintenance Engineer ..... [eldweb@caa.co.uk](mailto:eldweb@caa.co.uk)

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# CHIRP

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e-mail: <input style="width: 80%;" type="text"/> <input style="width: 15%; text-align: center; border: none;"/> ▲ Indicates Mandatory Fields	

It is <b>CHIRP</b> policy to acknowledge a report on receipt and then to provide a comprehensive closing response. If you do not require a closing response please tick the box:	No. I do not require a response from <b>CHIRP</b> <input type="checkbox"/>
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YOURSELF		THE EVENT/SITUATION			
TOTAL EXPERIENCE	YRS	DATE		WEATHER:	
EXPERIENCE PRESENT UNIT	YRS	LOCAL TIME		VMC	<input type="checkbox"/> IMC <input type="checkbox"/>
VALIDATED PRESENT POSITION	YRS	LOCATION OF AIRCRAFT		RAIN	<input type="checkbox"/> FOG <input type="checkbox"/>
ACTING AS INSTRUCTOR	<input type="checkbox"/>	NEAREST REPORTING POINT		ICE	<input type="checkbox"/> SNOW <input type="checkbox"/>
UNDER TRAINING	<input type="checkbox"/>	DAY <input type="checkbox"/> NIGHT <input type="checkbox"/>		OTHER:	
UNIT/SERVICE		FLIGHT PHASE		1ST AIRCRAFT	2ND AIRCRAFT
NATS <input type="checkbox"/> NON- NATS <input type="checkbox"/>		TAXI <input type="checkbox"/> TAKE-OFF <input type="checkbox"/>		TYPE/SERIES	TYPE/SERIES
ATC SERVICE(S) BEING PROVIDED		CLIMB <input type="checkbox"/> CRUISE <input type="checkbox"/>		OPERATOR	OPERATOR
TYPE(S) OF AIRSPACE		DESCENT <input type="checkbox"/> APPROACH <input type="checkbox"/>		PAX <input type="checkbox"/> FREIGHT <input type="checkbox"/>	PAX <input type="checkbox"/> FREIGHT <input type="checkbox"/>
TYPE OF RADAR		LANDING <input type="checkbox"/> GO AROUND <input type="checkbox"/>		OTHER:	OTHER:
SHIFT WORKED		OTHER:		IFR <input type="checkbox"/> VFR <input type="checkbox"/>	IFR <input type="checkbox"/> VFR <input type="checkbox"/>
HOURS ON DUTY	HRS			OTHER:	OTHER:
LOCATION		My MAIN POINTS ARE:			
NAME OF UNIT/AIRFIELD:		A:			
REPORT TOPIC		B:			
MY REPORT RELATES TO:		C:			

**DESCRIPTION OF EVENT - PHOTOGRAPHS, DIAGRAMS ON A CD ARE WELCOME:**

Your narrative will be reviewed by a member of the **CHIRP** staff who will remove all information such as dates/locations/names that might identify you. Bear in mind the following topics when preparing your narrative:

Chain of events • Communication • Decision Making • Equipment • Situational Awareness • Weather • Task Allocation • Teamwork • Training • Sleep Patterns

**continue on a separate piece of paper, if necessary**

PLEASE PLACE THE COMPLETED REPORT FORM, WITH ADDITIONAL PAGES IF REQUIRED, IN A SEALED ENVELOPE (no stamp required) AND SEND TO:  
**CHIRP** • FREEPOST (G13439) • Building Y20E • Room G15 • Cody Technology Park • Ively Road • Farnborough • GU14 0BR • UK  
 Confidential Tel (24 hrs): +44 (0) 1252 395013 or **Freefone** (UK only) 0800 214645 and Confidential Fax: +44 (0) 1252 394290  
 Report forms are also available on the **CHIRP** website: [www.chirp.co.uk](http://www.chirp.co.uk)

# CHIRP

## ENGINEER REPORT FORM

**CHIRP** is totally independent of the Civil Aviation Authority and any Company/Airline

Name: <input type="checkbox"/>	<p>1. Your personal details are required only to enable us to contact you for further details about any part of your report. Please do not submit anonymous reports.</p> <p>2. On closing, this Report Form will be returned to you.</p> <p><b>NO RECORD OF YOUR NAME AND ADDRESS WILL BE KEPT</b></p> <p>3. <b>CHIRP</b> is a reporting programme for safety-related issues. We regret we are unable to accept reports that relate to industrial relations issues.</p>
Address: <input type="checkbox"/>	
Post Code: <input type="checkbox"/> Tel: <input type="checkbox"/>	
e-mail: <input type="checkbox"/> <input type="checkbox"/> Indicates Mandatory Fields	

It is **CHIRP** policy to acknowledge a report on receipt and then to provide a comprehensive closing response. If you do not require a closing response please tick the box:

No. I do not require a response from **CHIRP**

### PLEASE COMPLETE RELEVANT INFORMATION ABOUT THE EVENT/SITUATION

YOURSELF		THE EVENT		DOCUMENTARY	
CERTIFYING ENGINEER <input type="checkbox"/>	TECHNICAL SUPPORT <input type="checkbox"/>	DATE OF OCCURRENCE		PROCEDURES <input type="checkbox"/>	MANUALS <input type="checkbox"/>
QUALITY <input type="checkbox"/>	MECHANIC <input type="checkbox"/>	TIME OF OCCURRENCE	AM/PM	DOCUMENTATION <input type="checkbox"/>	REGULATION <input type="checkbox"/>
EXPERTISE		THE AIRCRAFT		HARDWARE	
A&C <input type="checkbox"/>	AVIONICS <input type="checkbox"/>	AIRCRAFT/ENGINE TYPE		MATERIALS <input type="checkbox"/>	SPARES <input type="checkbox"/>
OTHER:		SYSTEM/COMPONENT		TOOLS <input type="checkbox"/>	
EXPERIENCE		AIRCRAFT REG	G-	EXTERNAL	
YEARS IN MAINTENANCE IND	YRS	REPORTED TO		COMMUNICATIONS <input type="checkbox"/>	WEATHER <input type="checkbox"/>
YEARS AT PRESENT COMPANY	YRS	LINE MANAGER <input type="checkbox"/>	QUALITY <input type="checkbox"/>	TIME PRESSURE <input type="checkbox"/>	OTHER:
WORK AREA/DUTY		TECH SUPPORT <input type="checkbox"/>	CAA - MOR <input type="checkbox"/>	ITEMS THAT WERE INVOLVED IN EVENT (TICK ALL THAT APPLY)	
LINE <input type="checkbox"/>	BASE <input type="checkbox"/>	OTHER:		INSPECTION <input type="checkbox"/>	FAULT ISOLATION <input type="checkbox"/>
WORKSHOP <input type="checkbox"/>	OFFICE <input type="checkbox"/>	FACTORS		TESTING <input type="checkbox"/>	INSTALLATION <input type="checkbox"/>
SHIFT WORKED		MANPOWER LEVELS <input type="checkbox"/>	SKILLS <input type="checkbox"/>	REPAIR <input type="checkbox"/>	SCHEDULED MAIN <input type="checkbox"/>
HOURS ON DUTY PRIOR TO INCIDENT	HRS	TRAINING <input type="checkbox"/>	MEDICAL STATE <input type="checkbox"/>	LOGBOOK ENTRY <input type="checkbox"/>	MEL <input type="checkbox"/>
THE COMPANY		My MAIN POINTS ARE:			
NAME OF COMPANY:		A:			
REPORT TOPIC		B:			
MY REPORT RELATES TO:		C:			

### DESCRIPTION OF EVENT - PHOTOGRAPHS, DIAGRAMS ON A CD ARE WELCOME:

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# CHIRP

## PILOT/FLIGHT CREW REPORT FORM

**CHIRP** is totally independent of the Civil Aviation Authority and any Company/Airline

Name: <input style="width:90%;" type="text"/>	1. Your personal details are required only to enable us to contact you for further details about any part of your report. Please do not submit anonymous reports. 2. On closing, this Report Form will be returned to you. <b>NO RECORD OF YOUR NAME AND ADDRESS WILL BE KEPT</b> 3. <b>CHIRP</b> is a reporting programme for safety-related issues. We regret we are unable to accept reports that relate to industrial relations issues.
Address: <input style="width:90%;" type="text"/>	
Post Code <input style="width:25%;" type="text"/> Tel: <input style="width:60%;" type="text"/>	
e-mail: <input style="width:60%;" type="text"/> <input style="width:5%; text-align: center;"/> ▲ Indicates Mandatory Fields	

<b>It is CHIRP policy to acknowledge a report on receipt and then to provide a comprehensive closing response. If you do not require a closing response please tick the box:</b>	No. I do not require a response from <b>CHIRP</b> <input type="checkbox"/>
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**PLEASE COMPLETE RELEVANT INFORMATION ABOUT THE EVENT/SITUATION**

YOURSELF - CREW POSITION				THE FLIGHT/EVENT			
CAPTAIN	<input type="checkbox"/>	FIRST OFFICER	<input type="checkbox"/>	DATE OF OCCURRENCE		TIME	(LOCAL/GMT)
PILOT FLYING	<input type="checkbox"/>	PILOT NOT FLYING	<input type="checkbox"/>	LOCATION		HEIGHT/ALT/FL	
FLIGHT ENGINEER	<input type="checkbox"/>	OTHER CREW MEMBER	<input type="checkbox"/>	TYPE OF ATC SERVICE		DAY	<input type="checkbox"/> NIGHT <input type="checkbox"/>
THE AIRCRAFT		TYPE OF FLIGHT		TYPE OF OPERATION			
TYPE/SERIES		IFR	<input type="checkbox"/> VFR <input type="checkbox"/>	PASSENGER	<input type="checkbox"/>	TRAINING	<input type="checkbox"/>
NUMBER OF CREW		OTHER:	<input type="checkbox"/>	FREIGHT	<input type="checkbox"/>	OTHER:	
EXPERIENCE/QUALIFICATION		WEATHER		FLIGHT PHASE			
TOTAL HOURS	HRS	VMC	<input type="checkbox"/> IMC <input type="checkbox"/>	TAXI	<input type="checkbox"/>	TAKE-OFF	<input type="checkbox"/>
HOURS ON TYPE	HRS	RAIN	<input type="checkbox"/> FOG <input type="checkbox"/>	CLIMB	<input type="checkbox"/>	CRUISE	<input type="checkbox"/>
TRG CAPT	<input type="checkbox"/>	ICE	<input type="checkbox"/> SNOW <input type="checkbox"/>	DESCENT	<input type="checkbox"/>	APPROACH	<input type="checkbox"/>
OTHER QUALIFICATIONS:		OTHER:		LANDING	<input type="checkbox"/>	GO AROUND	<input type="checkbox"/>
THE COMPANY				MY MAIN POINTS ARE:			
NAME OF COMPANY:				A:			
REPORT TOPIC				B:			
MY REPORT RELATES TO:				C:			

**DESCRIPTION OF EVENT - PHOTOGRAPHS, DIAGRAMS ON A CD ARE WELCOME:**

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