## AIR TRANSPORT

# **CHRP FEEDBACK**

### Issue No: 90

Spring 2009

### EDITORIAL

#### MAINTENANCE/END OF LEASE FLIGHT CHECKS

A recent serious incident involving a temporary loss of control of a UK registered Boeing 737-700 during an end-of-lease flight check is the subject of an investigation by the Air Accidents Investigation Branch.

The CAA has issued an Airworthiness Communication (AIRCOM 2009/03) highlighting the importance of accurately recording maintenance tasks; the AIRCOM also contains advice and guidance on the conduct of maintenance and other flight checks. A CAA FODCOM is also to be issued shortly on this topic.

The incident demonstrates the potential hazards associated with some non-routine flights and the value of appropriate training/experience. It is also a reminder of how quickly things can go wrong, if the outcome is not as expected. If you are a pilot or engineer who is involved in non-routine flights, it is strongly recommended that you read the AIRCOM and the FODCOM. Details of how to access the AIRCOM are on Page 7 and the FODCOM on Page 13.

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### SECURITY

Since the last issue, an initiative by the Guild of Air Pilots and Air Navigators (GAPAN) resulted in a meeting with Mr Jim Fitzpatrick MP Parliamentary Under Secretary of State for Transport in March; a senior representative of Transec was also present. The GAPAN delegation comprised Air Cdre Rick Peacock-Edwards, Master GAPAN, Captain Chris Hodgkinson, Technical Director GAPAN and Chairman of the CHIRP Air Transport Advisory Board and Peter Tait Chief Executive CHIRP. The meeting focused on the difficulties that flight crew and other staff continue to report to CHIRP and other representative bodies as a result of inconsistencies between and within UK airports, inappropriate personal searches and the lack of an effective complaint procedure for professional staff. The Minister's assistance was sought in addressing these issues and, in particular, developing a policy to require that airport authorities promulgate a complaint procedure for the reporting and investigation of security incidents. The Minister agreed to consider the request.

In the meantime, we have continued to receive reports on this topic of which the following are a selection:

#### THE GOOD.....

**Report Text:** Having read many of your reports over the last year or so regarding poor and variable security screening, I feel duty bound to write and state that at my base in nearly 3 years of flying about 7 days a month I have never been subjected to any abuse; the worst has been unfriendliness, and even that is rare.

The standard of checking has always been to a high standard (which I applaud as it is my interests as flight crew).

Sometimes there is a long queue, but rarely more than 10 minutes delay, even though there is only one crew post.

As a Trainer I like to think that I practice CRM whenever I have my uniform on and find that a simple "good morning" and smile makes for a good start.

I don't doubt the accuracy of the reports but feel that people like me don't usually write, so felt I should – maybe this base should be used as a role model to other Airports?

**CHIRP** Comment: We have received very few adverse reports from this UK regional airport and also several others; this suggests that with appropriate training and supervision it is possible to deliver the required level of security in an acceptable manner.

#### AIR TRANSPORT FEEDBACK is also available on the CHIRP website - www.chirp.co.uk

#### An Air Transport Safety Newsletter

from *CHIRP* the Confidential Human Factors Incident Reporting Programme

CHIRP, FREEPOST (GI3439), Building Y20E, Room G15, Cody Technology Park, Ively Road, Farnborough GU14 0BR Freefone: (24 hrs) 0800 214645

#### THE BAD....NO MILK ....

**Report Text:** I am based at *###* Airport as a shift supervisor on a 24/7 line maintenance operation. The Airport Management have recently chosen to restrict our passes upon renewal resulting in us being unable to access the Airside Retail Facilities. The reason stated is that DfT rules only allow RZ pass holders access to areas that RZ pass holders have an 'operational need' to be in.

This restriction means that we can no longer purchase meals, liquids etc that we are not permitted to bring through security. This means, for example, that there is now no legal way of bringing in a pint of milk into work! In my opinion this is a human factors issue and so far the Airport Management has dismissed our pleas for a review of this issue.

I have spoken to the DfT and they seem unconcerned with RZ pass holders mixing with passengers etc in the Terminal Airside areas and cannot see the logic of such a restriction. I was also told that the decision of which area RZ pass holders are allowed in is up to the Airport Management.

Whilst appearing to be a minor issue to others, I wonder what the reaction would be if an aircraft accident was to happen that may have been caused in part by a hungry/disgruntled member of staff. Perhaps this may just be another small hole in the 'Swiss cheese' of an aircraft accident. On a perhaps political note is it not just this sort of thing that may allow terrorists to think they are winning their war? Our lives should not be made more difficult when there seems to be no good reason to do so.

#### THE UNBELIEVABLE...NOT ENOUGH MILK!

**Report Text:** I was going through the Staff Security at ### (Major UK airport) at the start of my shift. I had purchased a two-pint bottle of milk for our office, with a current receipt (less than half an hour old). I was under the impression that we were allowed to bring in any amount under four pints. However, I was told by the security staff that the milk would be confiscated, as it was less than four pints!

I could not believe it and argued that I was led to believe I was allowed less than four pints. I was then told it was any amount over four pints, and that if I was to go back to the shop and buy another two pints with a valid receipt, I would then be given the two pints that had been confiscated back, as the total now reached four pints.

I was totally bemused by this situation and could see no security reason for allowing a minimum of four pints to be taken airside (I could understand a maximum - as pax have i.e. 100ml of liquids). My shift leader was equally perplexed by this bizarre rule and asked a security manager the reasons behind this arbitrary figure of four pints. He was told that a minimum of four pints constituted "a delivery", and as such was deemed allowable!! This apparently is a DfT directive.

Lessons Learned: Perhaps you could notify your subscribers, that If they would like to drink tea or coffee whilst on shift at ###, they must bring a

minimum of four pints airside. I thought the ban on bringing liquids airside was a security measure in response to a perceived terrorist threat. I appreciate the relaxing of the ban to allow airport workers to have refreshments (tea, coffee); however I can't begin to understand going from a complete ban to no maximum amount and instead confiscating milk from me for not bringing enough through security!

Seemingly everyday at ### there is another hoop to jump through to gain access to my workplace. I believe strongly in security; however I am often left bewildered at how it is implemented at ###.

#### AND THE UGLY .....

**Report Text:** At my base ### (UK regional airport) crew use the same security channel as passengers. I was with my crew, proceeding to the aircraft to start our multi-sector day. My bag was pulled aside by the screening staff, to whom I commented that I had forgotten to remove a bottle of crew water from my previous duty. In a voice that just dripped of an attitude of self importance and in a patronizing tone, the searching officer said "You should know better!" This was audible to both crew and passengers.

She then proceeded to open my flight case before I had reached the search desk, therefore without my permission or my being in attendance. (At the time, I was in the middle of retrieving all of my 'dangerous' items from the x-ray machine tray. You know the stuff, pen, mobile phone, change, wallet, sunglasses, watch). So in the space of 30 seconds I have been patronised and my flight case opened without my being in attendance. Temper beginning to simmer, but I'm holding it together, being professional in front of passengers.

She then proceeds to remove a deodorant stick from my flight case, which is solid, and not a liquid or gel form. The flight deck of the type that I fly is small, and not the coolest of places with no DV window to open, so hygiene and CRM make carrying one a good idea. I have been on the type for several years, flying regional routes, and one of these deodorant sticks has passed through the scanner without let or hindrance through several major airports, and several times weekly through ### for more than two vears! Her comment was "And that should be in a bag!" I replied that it was a solid not liquid; her response; "You could still melt it down!" WHAT!!!. So now I've been told that I, the captain of this flight could endanger the safety of my own aircraft by melting my deodorant. I can think of easier ways of breaking ANO article 63!

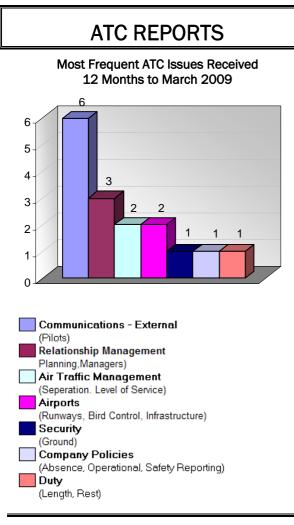
I replied rather jovially that I was perfectly capable of this without a stick of "Sure for Men" despite the fact that by now I was seething. Her final shot was "If you have a problem, complain to DfT".

I'd love to! About the patronising self important, egotistical bullies they allow to enforce the regulations! But how!

Our second sector saw us land back at ###, and due to a rerouting to act as a lifeboat for a tech aircraft, I had to report to the operations department, landside. Back through security, usual strip down before passing through the AMD (Metal Detector). I can't take the titanium pins out of my knee but this lot would like me to. The AMD doesn't go off, but I'm called outside for a body search which was almost rough enough to be classed as assault!

Why do DfT and airport authorities permit this behaviour from power crazy security staff to continue? As a Captain, I am rather protective of the crews I work with, and I am tired of starting a duty with a crew whose stress levels are raised unnecessarily by these people. How long before this situation has an adverse effect on safety.

Ah well; rant over - Thank you CHIRP, I'm feeling much better now!



#### More on Direct To vs Own Navigation

**Report Text:** In reply to recent articles regarding 'Direct To vs. Own Navigation', would the CAA RTF Phraseology Working Group consider the following:

By using two phrases of similar interpretation it leaves flight crews in the position of having to find the exact definitions tucked away in CAP413 and CAP493. This is even more awkward for foreign crews, who are unlikely to be able to reference such documents and who are possibly more easily led into confusion or misinterpretation, as English is not their first language. I would suggest that only one phrase is adopted as a standard phrase and also to purposely state that the other phrase should not be used. Being practical, I would suggest that 'Route Direct' be used as it is free from misinterpretation and it is fair to say that this is what crews always want - a direct route. Should crews not want a direct route (e.g. for weather avoidance) they can ask for an appropriate alternate clearance, and importantly such a request means that ATC are still aware of exactly what route/heading the crew are using.

If the phrase 'Own navigation' is used this could legally lead to the situation where those who wish to be purposely pedantic, or those who genuinely misinterpret the phrase, are able to weave whatever pattern they wish in the sky under their "own navigation". Additionally, if the definition of 'Own navigation' is to "route direct" then common sense dictates that the phrase 'Route direct' should be adopted.

**CHIRP** Comment: The reporter's suggestion was forwarded for consideration by the joint CAA/Industry Phraseology Working Group. The Working Group concluded that the both phrases should be retained as each applies to different circumstances.

In the case of "Route direct ####" the phrase is used for traffic management, separation and/or sequencing, as described above.

The phrase "Resume own navigation" has a different use in that, after a period of radar vectoring, the phrase is used to transfer the responsibility for tracking back to the pilot. The phrase is often used in uncontrolled airspace, for example after an aircraft has been given avoiding action against unknown traffic.

For the avoidance of doubt the CAA is to clarify in the relevant documents that if, on resuming own navigation a pilot is expected to route direct to a waypoint/position, the words "direct ####" will be included.

#### **BLOCKED RESCUE VEHICLE POINT**

**Report Text:** A medical incident had taken place on common land adjacent to the airfield boundary. The area concerned was not airside but was within 500 metres of the perimeter-track.

A Helimed helicopter was called to attend; later an ambulance was escorted to the scene via the aerodrome/runway with a RFFS escort.

On return the ambulance crossed the runway again with the RFFS escort and proceeded to the same gate by which it had entered the aerodrome, which is also used as the RVP.

Unfortunately the ambulance could not leave directly as the Rescue Vehicle Point (RVP) was blocked by a 4x4 vehicle waiting to enter the airfield. The ambulance was delayed for several minutes whilst the driver was found.

**CHIRP** Comment: This report serves as a useful reminder of the importance of ensuring that access via RVPs is possible at all times.

#### A HUMAN CENTRED APPROACH? - FEEDBACK 89

The CHIRP comment accompanying the above report on Page 5/6 of the last issue included a reference to the CAA in relation to the exercise being conducted. The CAA has pointed out that the type of exercise described in the report was co-ordinated directly between NATS, MOD and other Government departments.

The CAA has also stated that the Air Navigation Order does not preclude a UK registered aircraft carrying public transport passengers taking part in this type of exercise; however, in practice public transport flights are not used.

Notwithstanding the above clarification, adequate safeguards for monitoring the performance and welfare of individuals involved in any exercise conducted in a 'live' ATC scenario must be assured in the planning and oversight of such exercises.

### CAA (SRG) ATSINS

The following CAA (SRG) ATS Standards Department ATSINS and Supplementary Instructions (SI) to CAP 493 MATS Part 1 have been issued since **January 2009**:

#### SUPPLEMENTARY INSTRUCTIONS:

Supplementary Instruction (SI) CAP 493 MATS Part 1 (Number 2009/03) - Issued 2 March 2009, Effective: 30 March 2009

Revised Class D ATC Procedures

Supplementary Instruction (SI) CAP 493 MATS Part 1 (Number 2009/04) - Issued 12 March 2009, Effective: 26 March 2009

Wake Turbulence Separation Minima

Supplementary Instruction (SI) CAP 493 MATS Part 1 (Number 2009/05) - Issued 16 March 2009, Effective: Immediate

Procedures and Phraseology for Speed Control Applicable to an Aircraft at or Near the Level at Which Speed Changes from Mach Number to Indicated Airspeed (IAS)

#### ATSINS:

Number 151 - Issued 13 February 2009

Reduced Runway Surface Friction

#### Number 152 - Issued 13 February 2009

Implementation and Monitoring of Revised Air Traffic Services Outside Controlled Airspace

#### Number 153 - Issued 6 March 2009

Use of Target Filtering in ATS Surveillance Systems

#### Number 154 - Issued 12 March 2009

Initial Flight Plan - Application of Commission Regulation (EC) No. 1033/2006

Number 155 - Issued 31 March 2009

Eurocontrol Consultation: Air Traffic Engineer -Mandated Minimum Initial Training Standard

#### Number 156 - Issued 3 April 2009

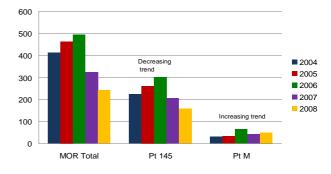
S-Band Primary Surveillance Radar - Potential Coexistence Issues with 2.6 GHZ Update CAA (SRG) ATS Information Notices are published on the CAA website -

www.caa.co.uk/default.aspx?categoryid=33 and click on the link 'Search for a CAA Publication'

### **ENGINEERING EDITORIAL**

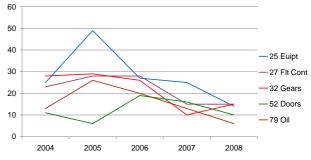
In addition to reviewing maintenance error incidents investigated by UK operators/maintenance organisations using the Maintenance Error Detection Aid (MEDA) the CHIRP MEMS Programme conducts a review each year of similar incidents using data supplied from the CAA MOR database; this provides an overview of reporting trends for maintenance issues under Part 145 and for maintenance control issues under Part M. In 2008 there were 158 Pt 145 maintenance errors reported and 51 Pt M events.

#### MOR Reporting Levels - 2004-08

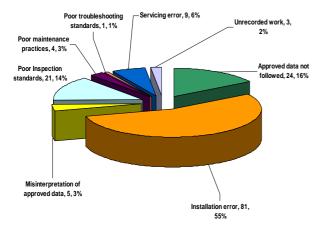


A comparison of the data for the period 2004-2008 shows that, overall, engineering MOR reporting levels have been declining in recent years; however, the number of reports for maintenance control issues under Part M indicates an increasing trend in arisings. Although the reporting trend under Pt 145 indicates a decline in total numbers, the relationship between error types as a percentage of the yearly total has remained reasonably consistent, with 2008 being typical in overall percentage terms

#### **Reporting Trend Primary ATA Chapters 2004-08**



The data shows a continuing level of maintenance issues derived from specific ATA chapters, with ATA 25 Cabin, 27 Flight Controls, 32 Gears, 52 doors, 72 Engine and 79 Engine Oil being the most predominant again in this review period.



#### MOR Maintenance Error Types 2008

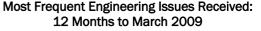
In regard to maintenance error types, Installation errors were identified as the highest level, these occurred in 55% (81) of reports, followed by Approved Data not being followed at 16% (24). Poor Maintenance Practices occurred in 11% (16); this included 7 events where tools and other items were not removed from aircraft after maintenance. Poor Inspection standards were identified in 9 % (15) with a failure of independent inspection in control systems found in 4 of those events. Servicing errors were identified in 6 % (9), mainly related to oil system overfilling. The predominance of Installation errors in this review period is consistent with the data from previous years.

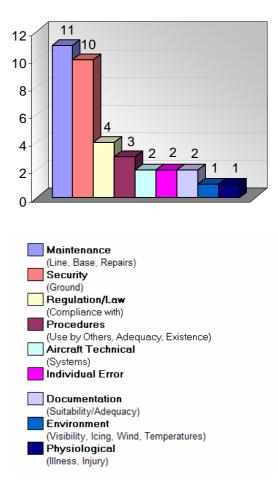
When the 81 Installation errors were reviewed, 51 were attributed to a failure to adequately follow technical instructions (Aircraft Maintenance Manual, Structural Repair Manual, Illustrated Parts Catalogue, etc); the wrong part was fitted in 11 cases; parts were not fitted in 3 events and a cross connection occurred in 1 event.

In respect of the 24 events where non-adherence to Approved Data was identified, the Minimum Equipment List featured in 14 events, the SRM in 5, the AMM in 4 and a Service Bulletin in 1 event.

Statistical information has been provided to support the above comment, disidentified information on examples of actual events will be provided in the next edition of FEEDBACK.

### ENGINEER REPORTS





#### **ENGINEERING STANDARDS - SMALL COMPANIES**

**Report Text:** In recent years the methods by which engineering is administered for small AOC companies has changed out of all recognition. From the operator's perspective none of the changes has had any benefit, whilst the downside in terms of cost has been dramatic.

This has a knock-on effect to Flight Safety which I will make clear later.

20 years ago a three-aircraft operating company would contract its maintenance to an engineering company. The engineering company took responsibility for technical records and its own engineering standards, which were controlled by a CAA surveyor, who generally speaking knew his stuff, having come from a similar background to the companies he was responsible for.

All the aircraft under a certain MAUW were maintained to the same schedule - The Light Aircraft Maintenance Scheme (LAMS). So everyone knew where they stood.

The operating company could concentrate on its commercial well-being, knowing that its aircraft were looked after in a consistent way. If there were difficulties with the quality of work, so far as this was

recognisable by aircrew, the management could discuss the situation with the surveyor or ultimately, make alternative arrangements.

The situation now has been made ridiculously complex. The operating company is now responsible for maintenance schedules, which may vary from company to company, together with formally auditing the quality of maintenance standards. How is this to be achieved by a company that was once perfectly viable with a staffing level of one pilot per airframe and a competent secretary?

So, the level of non-earning staff has to increase, still supported on the same number of airframes for which the CAA charges have tripled and tripled again over the years.

The CAA engineering surveyor, who once inspected the maintenance company's competence at the spanner level now spends his time in the CAME manager's office pushing paper around. Some of these surveyors know nothing about the aircraft they are responsible for. Quality has been sub-contracted to independent "Auditors" such that a medium-sized engineering company looking after 4 or 5 AOC companies has to spend months of management time looking after their disparate needs instead of running their company and supervising their staff 'hands-on'. Individual engineers are so frustrated by the paper overhead that they leave the industry or become contractors, where they can come and go as they please.

The results are apparent - no one wants an AOC any more and illegal CAT is visibly on the increase. The quality of aircraft on the flight line is not noticeably improved, and in some cases (mostly to do with changing airworthiness requirements) tangibly worse.

The burden on the finances of AOC companies, once light, approaches dire.

The burden of pointless legislation is crippling the industry.

Somehow, someone, somewhere needs to get a grip.

### **CHIRP** Comment: The CAA provided the following response to the reporter's concerns:

Under the 'old' regulations:

The AOC holder had to meet the requirements of CAP 360 Part 2 or JAR-OPS subpart M. Both of these met the same intent. This was to require the operator to be responsible for the airworthiness management of the aircraft in his fleet. Under these requirements, the actual activity could be contracted out, normally to an engineering organisation. That organisation, with some exceptions for the larger aircraft types, did not have to be approved by the CAA. However, the operator did have to take responsibility for including the contracted organisation within its quality and safety oversight system.

The LAMS schedule, based on a generic list of inspection tasks, had to be customised to suit the operator's fleet, equipment fit and to take account of the manufacturer's recommended inspections and service information. This required the co-operation of the operator and the engineering organisation but, even where the activity was contracted to an engineer or engineering organisation, the responsibility continued to lie with the operator and the schedule was the AOC holder's.

The CAA surveyor role has always been focused on the oversight of an organisation and its ability to comply with the requirements and support the aircraft it is approved for. A CAA surveyor will not be an expert on all aircraft types, that is why we have type-licensed engineers and approved organisations, but the surveyor is familiar with the various requirements that need to be applied.

The safety system relies upon the surveyor being satisfied that the engineer or company can comply with all of the relevant requirements competently. The engineer or company is very much master of their own destiny and have to take responsibility for all they have to do within that safety system, from the physical aspects of the work, through the paperwork and record control (which is where the greatest weaknesses are in this sector of the industry) to the application of quality control and assurance practices.

Comparing the 'old' with the 'new':

- The operator is still responsible but needs to comply with Part M subpart G instead of CAP 360 Part 2 or JAR-OPS subpart M.
- The LAMS is still being used (under the guise of the LAMP) and is the property of the operator. For smaller aircraft however that can be contracted to a suitably approved engineering organisation.
- The operator is responsible for the establishment of technical records control for its fleet although many of the actual tasks within that activity can be contracted.

Arrangements were made for the reporter to discuss his concerns with the British Business and General Aviation Association, which has expressed similar views on the impact of the new regulations.

#### CONTRACTED STAFF - SHIFT WORKING (FB89)

**Report Text:** As a retired aircraft engineer whose licence is still valid because I am receiving your Chirp magazine, I would like to comment on 'Contracted Staff - Shift Working' on Page 4 of FEEDBACK No. 89.

I thought the report text was very well written and the Chirp comment very much on target; however, surely this only shows how the industry is too loosely regulated and the CAA should have had the situation of 21 days on shift in their sights without the contractor in question having to report it to you.

#### Two comments:

Isn't this the same as what has been happening in the financial world?

Why can't you name and shame the particular maintenance organisation so that prospective contractors could be warned off.

**CHIRP** Comment: As was noted in the last issue, the matter was referred to the CAA and in a subsequent audit of the company the Authority required that the company produce acceptable procedures for the control of contractors' working hours to ensure that adequate rest was provided.

Companies hold the prime responsibility for ensuring safe maintenance working practices. Where a company

elects not to discharge this responsibility, the availability of a confidential reporting system allows the matter to be reported with no risk to the individual, reviewed by the CHIRP Advisory Board and, if sufficiently serious, to be subsequently investigated by the CAA.

#### IS YOUR FIRE EXTINGUISHER USEABLE? (FB89) - A COMMENT

**Report Text:** Re the item 'Is Your Fire Extinguisher Useable?' FEEDBACK 89 Page 12.

To be brief, correct intention made by the report but not sure the word 'CULPRIT' belongs in an HF publication?

Is this a difference between HF & CRM?

**CHIRP** Comment: We received several comments about the use of the term 'culprit' in the original report and also the reporter's assumption that the wire locking was carried out by an engineer.

In retrospect, it is accepted that the use of the term merited further consideration prior to publication; however, the purpose of publishing the report was to highlight the unintended consequences and potential danger of an incorrect action.

As an industry we have progressed from the earlier notion of a 'no blame' culture to what today we describe as a 'just and accountable' culture. As professionals we all have defined terms of reference and as licensed engineers our scope of responsibilities is not only described in company procedures but also laid down under an Act of European law. We should therefore expect to be held accountable for our actions.

Mistakes are and will be made, that's human factors! It is not our intention to imply in any way that trained professionals from any area of aviation knowingly act with anything other than the highest level of integrity.

### CAA (SRG) AIRCOMS

The following CAA (SRG) ATS Airworthiness Communications (AIRCOMs) have been issued since January 2009:

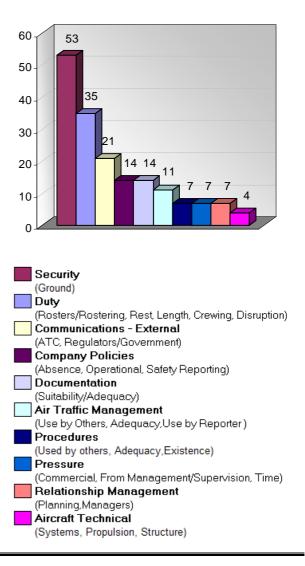
#### 2009/03

Ensuring Satisfactory Co-ordination between Operators and Maintenance Organisations for Maintenance Check Flights

CAA (SRG) AIRCOMS are published on the CAA website (<u>www.caa.co.uk</u>). Any queries can be addressed to Airworthiness Strategy and Policy Department (<u>requirements@caa.co.uk</u>)

### FLIGHT CREW REPORTS

### Most Frequent Flight Crew Issues Received: 12 Months to March 2009



#### MORS NOT SUBMITTED (1)

### We received a number of reports on this topic of which the following two are typical:

**Report Text:** My company has informed us that the CAA is not accepting ASRs/MORs on airport security matters as they do not conform to their criteria for MORs.

As current advice from CHIRP, and indeed BALPA, is to file ASRs where we feel it is appropriate, now that the CAA has rejected this as an avenue, how are we supposed to deal with air safety related issues caused by security officials? Do not say "company management" as they have demonstrated themselves to be ineffectual in this regard over the past few years.

### MORS - NOT SUBMITTED (2)

**Report Text:** To my surprise the attached report was downgraded from an MOR to an ASR and marked 'Investigation Not Required'. It was not forwarded to the

CAA. When I queried this action with my company Safety department they informed me that the CAA had given instructions that such reports should not be submitted to the Authority unless a direct safety threat to an aircraft or crew was manifest. ....If you thought ticking the box sent the report to the Authority, that is no longer the case!

I can understand that company safety departments are frustrated and frankly powerless in matters that are governed by TRANSEC, but it now appears that the CAA itself has also thrown in the towel and admitted defeat. In the conduct of flight I am the final arbiter of safety. If I say we don't go then we don't go. If my concerns on matters of safety are now filed in the bin by the very legal Regulators of Safety themselves then we might as well pack up and join the third world.

The powers given by TRANSEC to local 'managers' to decide whatever methodology of search they desire has resulted in mismanagement of crew search areas and acute crew frustration. Such measures far outweigh the threat posed by operating crew. TRANSEC needs to come back into the real world. It must temper and standardise its search procedures in proportion to the threat and ensure its requirements are correctly funded by airport operators. I feel the frustrations now experienced by operating crew over illogical and overzealous security will, given time, lead to some rather tragic newspaper headlines.

### **CHIRP** Comment: This issue was raised both with the company and with the CAA.

The CAA advised that guidance to operators was issued in August 2008; this stated that it would be helpful if flight crew members could be explicit when filing MORs on security procedures by providing information about why the security actions resulted in a flight safety hazard (e.g. distraction - missed a checklist item; preoccupied during take off - incorrect/late call out etc.). The CAA noted in the guidance that in the case of reports where there was potential for a flight safety hazard but no evidence in the report that flight safety had been affected, these would be assessed as Grade E but would still be recorded on the CAA MOR database and also copied to the DfT.

CHIRP understands that the airline has reviewed its policy in relation to security related reports.

Our advice remains valid; report any significant experience involving security by submitting an MOR. Even if such reports do not, in themselves, bring about the improvements that you and we are seeking, in the event that a serious incident occurs in which a security experience is identified as a contributory cause the investigation will undoubtedly look for corroborating evidence of the security problem.

Also, a reminder - some companies screen out reports submitted as MORs if they assess the incident not to be within the scope of the MOR Scheme. In such a case, if the reporter considers the matter to be within the Scheme, he/she is obligated under his/her licence holder responsibilities to submit the report directly to the CAA, using the confidential MOR procedure if necessary. If for whatever reason an individual feels unable to report directly to the CAA, report the matter to us and we will ensure that the matter is represented.

#### FLIGHT TIME LIMITATIONS - FODCOM 10/2009

Over the past three years or so, we have received a significant number of reports seeking our advice on the way in which some UK AOC holders have interpreted the guidelines for managing fatigue that are published in CAP 371. Most if not all of these issues have been represented to the CAA since, as many of you will appreciate, your company's Approved FTL scheme and not CAP 371 is the key reference document.

Notwithstanding this, it has been apparent that seemingly different interpretations existed in a number of areas of FTLs. The CHIRP Air Transport Advisory Board has requested on a number of occasions that the CAA consider clarifying the intent of some of the guidance material on which Approved FTL schemes are based.

On 6 April 2009 the CAA issued FODCOM 10/2009 -FLIGHT TIME LIMITATION (FTL) SCHEMES - CURRENT ISSUES AND CONCERNS; this highlights some of the current concerns over FTL practices, provides clarity over certain aspects of the guidance in CAP 371 and includes details of some additional allowable variations to Schemes.

Details of how to access a copy of the FODCOM are on Page 13.

#### **REPORT TIMES VS LEGAL DUTIES**

**Report Text:** The Company that I work for occasionally rosters me to complete duties that extend to the limits allowable under CAP371. If there is any delay then the duty must be covered by Captain's Discretion.

When I report for these duties, 60 minutes before scheduled push-back, I have 90 minutes of work to do in printing off the weather, NOTAMs and flight plans, ordering fuel and proceeding to the aircraft and completing the required pre-flight preparations at the aircraft. The only options are to either report early and deliberately extend the duty beyond CAP371 limits, or report on time and delay the flight thereby extending the duty beyond CAP371 limits. Either way, I am required to break the law. Even when the flight does not exceed the FTL maximum, the minimum rest calculations and recording of cumulative duty times are not correct because of this system of scheduling insufficient time for pre-flight duties.

Company management is aware of this situation. All of the pilots are aware of this. I suspect that even the CAA is aware of this situation. Why is this situation knowingly allowed to continue? One argument that the Company use is that the rest of the industry do this and that it is unreasonable for them to be at a commercial disadvantage.

I have previously raised this through the CHIRP system but your influence so far has proved to be completely ineffective.

Lesson Learned: So far, the only lesson learnt is that the CAA and CHIRP are completely unable to stop major UK charter operators from breaking the law.

**CHIRP** Comment: Although the reporter refers to CAP 371 limits, it should be remembered that your FTLs are limited by your Approved company FTL scheme, which might be different in some respects.

We have previously highlighted this issue both in FEEDBACK and to the CAA. It is the operator's responsibility to monitor crew report times; all essential pre-flight duties should be able to be accomplished <u>routinely</u> within the period between the scheduled report time and the scheduled departure time. There may be occasions when more time is required, such as that described in the next report; these are acceptable if they occur on an occasional basis. However, if longer pre-flight duties are the result of a systemic problem or are associated with a particular route or an operation such as ETOPS, the operator is obligated to review the report times.

Similarly, an operator should monitor the use of discretion and take action if it is routinely required.

The Air Transport Advisory Board has consistently taken the view that the primary responsibility for establishing an appropriate report time is that of the operator. However, in cases where the evidence suggests that the report times are not appropriate or in cases where maximum Flight Duty Periods are being exceeded and/or minimum rest periods are being adversely affected, the CAA Flight Operations Inspectorate has a responsibility to assess whether the operator is managing the risk of crew fatigue appropriately.

FODCOM 10/2009 references both the use of commander's discretion (Para 3.4) and report times (Para 3.6).

#### LACK OF SIMULATOR TRAINING

**Report Text:** I wish the Authority had a different view on safety in respect of business/corporate operations. It seems that all the Authority cares about is paperwork and classroom training (e.g. CRM, Dangerous goods, Security...). Do they care about the actual handling of an aircraft? It doesn't appear so!

Because we have a licence and a type rating doesn't make us safe to operate an aircraft. Why can't we have mandatory bi-annual or annual simulator training? Annual dangerous goods training is mandatory. Annual CRM training is mandatory. So why not simulator training?

They seem to be happy with the six-monthly checks that we do in the aeroplane. In my opinion those checks have no safety value whatsoever. It is just done to tick a box on a piece of paper to please the Authority. We want to see flashing red lights, we want to hear alarm bells, we want to push buttons, we want to practice emergency check lists, we want to practice CRM in a real-time emergency situation and not only talk about it with a cup of coffee, we want to practice company SOPs. However, all this is left to the discretion of the company, but in a company money comes first and safety comes second.

Please Mr CAA make at least annual simulator training a mandatory requirement.

**CHIRP** Comment: The current regulatory requirements for business/corporate operators are relatively modest and do not require operators to provide recurrent simulator training. However, the International Standard for Business Aircraft Operations (IS-BAO), established in 2002, Section 5 states: "Industry best practices are to use flight simulators for initial and recurrent training" and "It is recommended that flight simulators be used for flight training to the maximum degree practicable." A significant majority of corporate operators now use flight simulators for emergency/ recurrent training.

The CHIRP Air Transport Advisory Board has concluded that there is a compelling case that recurrent simulator training should be mandatory in this sector.

#### **NOTAC PROFUSION**

**Report Text:** On reporting for duty after 2 days off I found that there were 33 new NOTACs (Notices to Air Crew) relating to our operation and to my specific aircraft type. This is an unacceptable number of NOTACs to be issued in two days (I had last checked before leaving work for my days off and was fully up to date). This could have a direct impact on safe operation.

To make matters worse, out of 12 check-in stations only 5 had printers that were working meaning that it was near impossible to obtain hard copy documentation. I left the crew room having briefed for the day's duty with a somewhat fuzzy head and wondered if, indeed, I had missed something important. I am aware of several crews delaying departure by a significant time simply to read the NOTACs on this day.

Lessons Learned: Delay the pre-flight briefing until all information has been collated and read. Delay departure until the full crew are ready to go.

**CHIRP** Comment: The situation described is indicative of poor management control of the NOTAC process and is a classic Human Factors issue that could lead to important operational information being missed or the pre-flight preparation at the aircraft being rushed.

Similarly, the unavailability of an adequate number of serviceable printers is one of the more common complaints associated with the difficulties that some flight crew report in not being able to complete their required pre-flight duties within the scheduled report time.

Both of these issues should be adequately managed within an operator's safety and quality systems. Where reports suggest that this is not the case, CAA Flight Operations Inspectors have a role to play in monitoring the pre-flight process as part of their audit responsibilities.

#### MORE ON NEW APPROACH/DEPARTURE CHARTS

After publishing a reporter's concern about the font, format and presentation of new style approach/ departure plates in the last issue of FEEDBACK (Page 10), we received a significant number of reports and telephone calls endorsing the reporter's views. The following reports were typical of the views expressed: **Report Text:** I am responding to the report in FEEDBACK 89 titled "New Style Charts." If he is referring to the ### charts, then I agree with him.

The text is too small. I used to have good eyesight as well but after consultation with my AME now have to wear +1.00 glasses at night to read these charts. They are even harder to read when being thrown around by turbulence at night. I have found the pictorial on the SID and STAR plates not as clear as they use to be. For example a LANAK 1A to GLA in my mind is not clear as the old charts were.

The vertical profiles on the new approach plates are small and cluttered. I have misread the crossing height at 4 miles on approach to runway 14 and 32 ILS at LBA, as I thought the height indicated on the chart related to another position. Fortunately, the error was spotted.

#### (2)

**Report Text:** I would just like to add my voice to a report which was printed in this month's issue of FEEDBACK about the new ### charts.

I also totally agree with what was printed. I am not totally sure why but it seems to take a lot longer to read and find information off this new format of chart, especially in go-arounds and just after departure. I think the small print is a big factor.

Also having a departure track on SID plates and holds on arrival plates shown to scale is not important when flying an airliner in IFR conditions and this also seems to make the plates harder to review quickly.

I never really had this problem before, and this view seems to be shared with just about every single person I fly with!

#### (3)

Report Text: My detailed comments are:

- Print is often unreadable in low light or even good light due to font and/or font size.
- The legend misses out some symbols on the chart.
- There are references on charts to VORs without frequencies.
- VORs, NDBs and waypoints have the same symbol which then changes when it is not on a SID/STAR.
- Airfields names are in local language we cannot be expected to know all the local names for places, especially diversions we may need to find quickly in unfamiliar places.
- DME scale on approach chart does not state which DME it uses, for airfields with 2 such as FRA, this could be very dangerous indeed (I have crashed in the simulator for this reason in the past with confusing altitude depiction).
- Minimum Safe Altitudes (MSAs) on plate show they are based on the Airfield Reference Point (ARP), but not how far they go out (25nm, 10?).

- Stop altitudes are unclear the previous depiction with lines above and below was far superior.
- MSAs are green the green is hard to see at night.
- Some notes are missing from plates, for example Oceanic clearance procedures.
- There are numerous fairly serious mistakes on many plates.
- Glidepath angle is very faint.
- No QFE information.
- No entry segments on holds.
- Radial depicted instead of track that needs to be flown on some SID/STARS (i.e. reverse of what you want to set)
- Notes can be scattered over the plate instead of being in a list.
- LHR departure frequencies are in the notes and not together with the frequencies at the top (notes are ok, but frequency should appear in the frequency box too).
- Missed approach procedures are confusingly written (although having the aids and frequencies listed is a help).
- Heights not given as well as altitudes on plates operating to different standards such as QFE/QNH could then lead to confusion (although we don't any more, there are times when this could happen, and these are the times when confusion will be more dangerous).
- LHR ground plate is unclear giving space to buildings the other side of the A4 at the expense of space to show important information.

I would say the most serious problems are lack of clarity, the large amount of mistakes, the change in altitude depiction (and lack of DME info), the lack of differentiation between navaids and having local names for places as the title for the plates.

There are some improvements, such as having engine out SIDs and the lighting to expect on the runway depicted on the approach plate. Overall though I would say they are a very poor replacement for what we had already. The previous style used for the UK was better than that used for Italy, but the new plates are worse than both on balance.

I'm sure there are more problems too, but these are the ones that come to mind as I write this.

**CHIRP** Comment: All of the comments received on this topic were passed to the chart provider for review; they are currently being considered. The comments have also been forwarded to one of the UK AOC holders who use the charts, to add to the information received in company reports, and to BALPA who have made similar representations with the chart manufacturers on behalf of their members.

It is understood that recommendations to improve some aspects of the charts have been made. If you note any significant errors/shortcomings with your approach/ departure charts, report the matter to your company in the first instance, as the matter can be reviewed with the relevant chart provider as part of the supplier/customer relationship.

#### THE HUMAN ELEMENT AND CRM

**Report Text:** As one of an increasing number of gay pilots I wanted to write to highlight some CRM considerations that may not be immediately apparent to the larger pilot community.

A small minority of my colleagues occasionally make comments, whether in reference to newspaper articles or to other colleagues, that are, to varying degrees, anywhere from mildly homophobic to openly contemptuous. It is one thing to say that colleagues should "be able to take a joke" but there is no reason that the recipient of such comments should have to bear all the responsibility, for their entire career, for not letting such comments interfere with flight safety.

Such comments can have a clear effect on the CRM that we go to such expense to train now. Even the best intentions to not "let it get to you" may fail and may lead to colleagues becoming withdrawn or angry. In turn the pilot who made the comment may sense the change in CRM but not realise the reason was an offhand comment half an hour or a day earlier.

When these comments come from a Captain to a First Officer they are particularly disruptive, as First Officers may not always feel they are not in a position to speak up. I myself have on several occasions had to make a conscious effort to "clear my head" for an approach after having heard a colleague make comments of this kind. I think most crew who make such comments are well-intentioned and harbour no animosity but are just making conversation, unaware of the potential impact on the listener. It is not about political correctness, it's about our responsibility as flight crew to create an atmosphere that is relaxed and conducive to communication.

Perhaps this situation occurs much more frequently than do disruptive comments directed at ethnic minorities or female crew, no doubt because their presence on a flight deck is obvious. One UK operator recently did a survey in which 4% of pilots said that they felt disadvantaged by their sexual orientation "a great deal" or "a fair amount," (another 7% said "not much/a little.") That might not sound like a lot but that 4% probably constitutes at least half of the gay flight crew employed by that operator and could possibly be extrapolated to a large number of pilots and incidents across the UK.

Lessons Learned: Aside from our legal obligations under anti-discrimination legislation, we all have an obligation under our corporate procedures to create an atmosphere on the flight deck that is conducive to CRM and to flight safety. Everyone is free to think what they like, but as the pilot community becomes more diverse we should be aware of the impact of our language on even the most thick-skinned colleagues. I think a version of this in print for CHIRP readers would almost by itself eliminate such comments from most flight decks.

CHIRP Comment: Maintaining an effective professional interpersonal relationship between

operating flight crew members is a pre-requisite for good crew resource management. Clearly the same applies to all working environments and is no different for other aviation professionals or office staff

The reporter's 'lessons learned' are worthy of consideration for the message that they so clearly explain.

### CABIN CREW REPORTS

#### AN UNEXPECTED OUTCOME

**Report Text:** During boarding we experienced some passenger problems; the flight deck was kept informed. The problems continued after departure and during the meal service; the situation was again handled by the In Charge and cabin crew. Again, the flight deck was kept fully informed; however, it appeared that they did not appreciate the numerous phone calls. One flight crew member then went on controlled rest and all crew were informed.

A short while after a passenger became sick and it was decided to treat the passenger with therapeutic [On this aircraft type (supplementary) oxygen. therapeutic oxygen is provided using the 'ring main' system in the passenger cabin that also provides emergency oxygen to passengers in the event of a loss of cabin pressure]. The flight deck was notified and the operating pilot was requested to activate the therapeutic oxygen supply suddenly **all** the oxygen masks in the cabin were deployed and the pre-recorded emergency 'Loss of cabin pressure' announcement started playing. Fortunately the crewmember who had made the call to the flight deck realised there was no decompression and made appropriate an announcement to calm and reassure the passengers. With great teamwork the crew calmed the cabin and ensured everyone was OK. The In Charge then made a PA asking passengers not to tamper or try to re-stow any of the masks.

The In Charge subsequently entered the flight deck to find out what had happened; the flight crew were totally unaware of the chaos out in the cabin. The Captain then suddenly realised what had occurred; at no time did the Captain make a PA with reference to the incident.

The Captain's welcome on our arrival was extremely quick and quiet. After passengers had disembarked the Captain never spoke to us as a crew and there was no debrief regarding the incident. It was as if it never happened. All the crew were reluctant to raise the matter directly with the Captain. No explanation was given to the crew as to what had happened and how the incident had occurred.

Lessons Learned: CRM is extremely important when an incident like this occurs. The Captain should always discuss the incident with the crew as he/she is the Commander of the aircraft and takes ultimate responsibility for the whole crew. A PA should also be made to the passengers.

**CHIRP** Comment: With the reporter's consent, this report was forwarded to the company. The incident highlighted several procedural and CRM issues that were addressed.

The general lesson to be learned from this incident is that sometimes things go wrong either as a result of a human error or an inadvertent failure in SOPs. The important point is how the situation is managed thereafter. In this incident it would appear that the cabin crew responded well to the inadvertent deployment of the 'rubber jungle'; however, when the flight deck eventually became aware of the problem, a PA broadcast explaining the situation would have assisted. Similarly, as the reporter notes, taking a few minutes to conduct a post-flight review of an incident such as this with both flight and cabin crew is a fundamental part of Crew Resource Management.

#### **ADDITIONAL CREW REST - WHY?**

**Report Text:** On the inbound flight from AAA (Far East) to BBB (UK) we had four flight crew. The first two took 5.30 hours rest in bunks for the first half of the flight and then the other two went into the crew bunks.

When the In Charge returned from their break, they were told by the Senior (selected in the briefing to cover In Charge's absence) that the flight deck was not to be contacted as they were on controlled rest. This meant that one of the pilots flying the aircraft was having a sleep whilst the other monitored the flight.

The usual agreement between the flight crew and In Charge with our airline is that the In Charge contacts the pilots at the top of the hour to confirm all is well in the cabin and also to confirm the pilots wellbeing. The cabin crew operating in the premium cabin contact the pilots on the half hour to confirm the status of the cabins and to confirm any requests the pilots may have i.e. tea or coffee etc.

It was disappointing that the pilots had decided to have a second break as this reduced the pilot cover to 1 out of 4 - it was also not communicated to the In Charge prior to them going on break, had they known this they would have questioned these intentions.

Is it accepted policy that even after having such an extensive break that knowing the extra pilots are carried to allow such extended breaks, that a second break is required leaving minimal cover on such a long sector?

Lessons Learned: It would appear that there is a sub culture within the flight deck community that does not recognise good CRM and the In Charge said they will in future confirm the exact intentions of the pilots regarding their rest prior to take off.

**CHIRP** Comment: Some long haul operators roster the 'heavy crew member(s)' in order that individuals can anticipate their period of bunk rest in advance of reporting for duty; others do not. In either case, if a situation should arise where a flight crew member is not able to gain adequate rest during their assigned period of bunk rest and it is agreed to take an additional period of controlled rest as a fatigue management measure, it must be communicated to the In Charge.

Similarly, it is not unreasonable for cabin crew members to expect flight crew members to comply with the company's flight deck alerting SOPs. Therefore, if your company SOPs require the cabin crew to contact the flight deck periodically and there is no alternative SOP promulgated, you must not only communicate your reason for not wishing to be contacted regularly during a period of controlled rest to the cabin crew but also arrange that the operating pilot contacts a member of the cabin crew at your company's recommended intervals.

#### **DISCRETION?**

**Report Text:** We left our hotel at 09.30 GMT and reached the airport 15 mins later.

Take off was delayed due to slow boarding and we eventually departed at 12.15 GMT. We arrived at our intermediate stopover at 16.25 GMT, where a new flight crew boarded. We took off for our final destination at 18.05 GMT and landed at 01.30 GMT.

Off duty 02.30 GMT (i.e. total duty 17 hours). We checked in flight with the Captain who did the second sector and he told us that we were in hours; however on landing into CCC, he said, "Oh sorry, you did go into discretion!".

**CHIRP** Comment: It is the responsibility of the operator to have a procedure whereby the aircraft commander is able to monitor and control cabin crew FTLs; this is particularly important in a case such as that described.

In a situation where an aircraft commander might need to exercise discretion on behalf of the cabin crew to complete the duty, the possibility should be communicated to all cabin crew members. 'Ducking' the issue hardly inspires confidence.

### CAA (SRG) FODCOMS

The following CAA (SRG) FODCOMS have been issued since January 2009:

#### 03/2009

The Importance of Using Performance Data Appropriate to the Existing Runway Conditions 04/2009

European Aviation Safety Agency Consultation Process for Air Operations

#### 5/2009

Illumination of Aircraft by Bright Lights of Lasers 6/2009

Runway Surface Friction and Runway Rehabilitation -**Revision to Guidance Material** 

#### 7/2009

Letter of Intent: Proposal to Amend the Air Navigation Order 2005. Proposal to Amend Article 6 and Article 138 of the Air Navigation Order 2005 for the Purpose of Making it an Office to Advertise Flights Considered to be Illegal Public Transport

#### 8/2009

Actions That Should Be Taken in the Event of an Uncontrolled Aeroplane Fire on the Ground

#### 9/2009

Initial Flight Plan - Application of European Commission Regulation (EC) No. 1033/2006

#### 10/2009

Flight Time Limitations (FTL) Schemes - Current Issues and Concerns

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

If you wish to contact the CAA Flight Operations Inspectorate or to report any safety matter which is outside the scope of the MOR Scheme please e-mail the CAA at:

flightoperationssafety@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

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
ATCO/FISO	ats.licensing@caa.co.uk
Maintenance Engineer	eldweb@caa.co.uk

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FEEDBACK is published quarterly and is circulated to UK licensed pilots, air traffic control officers and maintenance engineers.

### **CHIRP**

### AIR TRAFFIC CONTROL REPORT FORM

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#### 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

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Report forms are also available on the CHIRP website: www.chirp.co.uk



### **ENGINEER REPORT FORM**

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		contact you for further details about any part of your
Address:		report. Please do not submit anonymous reports.
		2. On closing, this Report Form will be returned to you.
		NO RECORD OF YOUR NAME AND ADDRESS WILL BE KEPT
Post Code:	Tel:	3. CHIRP is a reporting programme for safety-related
	-	issues. We regret we are unable to accept reports that
e-mail:	Indicates Mandatory Fields	relate to industrial relations issues.

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

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#### 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:

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

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### **PILOT/FLIGHT CREW REPORT FORM**

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NUMBER OF CREW						OTHER:				FREIGHT		OTHER:				
Exp	ERIEN	CE/QI	JALIFIC	ATION		WEATHER				FLIGHT PHASE						
TOTAL HOURS					Hrs	VMC		IMC		ΤΑΧΙ		TAKE-OFF				
HOURS ON TYPE					Hrs	RAIN		Fog		CLIMB		CRUISE				
TRG CAPT	D TF	ε		IRE		ICE		SNOW		DESCENT		APPROACH				
OTHER QUALIFICAT	IONS:					OTHER:				Landing		GO AROUND				
THE COMPANY								I	AY MAIN POINTS ARE:							
NAME OF COMPANY: A:																
		REP	ORT TO	PIC			в:									

#### 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

c:

MY REPORT RELATES TO:

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

E PLEASE PLACE THE COMPLETED REPORT FORM, WITH ADDITIONAL PAGES IF REQUIRED, IN A SEALED ENVELOPE (no stamp required) AND SEND TO:

CHIRP · FREEPOST (GI3439) • Building Y20E • Room G15 • Cody Technology Park • Ively Road • Farnborough • GU14 OBR • 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