CHIRP
Air Transport FEEDBACK

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EDITORIAL

Communications issues are reported again in this issue: the use of social media by engineers – see the editorial below - and the use of RT (Ride Reports and the Abuse of 121.5). In some senses it is odd that aviation makes so much use of traditional voice communications when considering the weaknesses inherent in such media. Listening out for one's own callsign amid a torrent of messages for other aircraft, frequently delivered in accented English, all competing for attention with other flight deck routines, noises and alerts, isn't the best use of pilots' mental capacity. Can we really not improve on this? In fact, notwithstanding the introduction of Controller Pilot Data Link Communications, the mandating of radios with 8.33 kHz channel separation suggests more, not less, use of this medium. So it is particularly disappointing to receive reports about pilots filling up air time with largely unnecessary transmissions and misusing the international distress frequency - 121.5. The latter should be regarded as equivalent to compromising safety equipment. It can probably be stopped but it will take some effort and – you know what's coming – pilots will have to decide that it is important enough to report it. Over to you.

ENGINEERING EDITORIAL

An engineer keeping in touch with former colleagues at a UK Continuous Airworthiness Management Organisation (CAMO) became alarmed at the hours individuals were working. It must be said that the reported engineers had not necessarily breached any regulations as they might have opted out of working time regulations. However, engineering organisations should be monitoring rosters and working hours according to regulations and be cognisant that individuals might be willing to work longer than is good for them as individuals and beyond the point where they are making sensible decisions. We have seen before that engineers are reluctant to declare themselves fatigued, which removes one of the safety barriers present in other fields of aviation. All the more reason for colleagues to watch out for each other and report organisations where there are mismatches between the workload, deadlines and manpower resources.

Ian Dugmore - Chief Executive

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COMMENT ON FEEDBACK EDITION 125 - FATIGUE

I would like to make some comments about fatigue.

I understand that it is up to the crew member to decide whether or not a contemplated duty will make them excessively fatigued. This decision is a fundamental safety matter. Fatigue builds up over a period of time. Someone who is almost certainly already fatigued to a significant degree is required to make the decision. The decision on a fundamental safety issue is left to someone whose judgement is already impaired.

I experienced exactly this. I returned to base on the fourth day of a five day standby block. The four days had been hard and I was certainly fatigued when I was handed my duty for the following day. The crew controller also handed me the manual open at the page that described my ability to decline the duty on the grounds of fatigue. It was a relatively short flight to Nice and return so I thought that I would be OK after a night's sleep. We were crossing the South coast when it began to dawn on me that I wasn't performing adequately. Thanks to good weather, a good co-pilot and good fortune we got back to base without incident.

The lesson: When I should have made the decision to decline the duty, my judgement was already impaired. I could have declined the following day, but at check in I didn't feel too bad after a night's sleep. It was only when the pressure of operation began to affect me that I realised I was badly fatigued. Nice can be a complicated approach and departure and is not the place to have someone below par. At Nice I was just concerned to get the day over. On return I didn't file any report because I didn't want to advertise my poor judgement and I just wanted to sleep.

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COMMENT ON FEEDBACK EDITION 126 - EDITORIAL

Your editorials in the latest CHIRP edition and on fatigue in the last edition are excellent. It really homes in on the factors that are adversely affecting the industry. It is very difficult to find a balance between Industrial (Commercial) Relations and the effect on individuals, and their ability to function effectively.

The article on vicarious liability was very well explained and informative.

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COMMENT ON FEEDBACK EDITION 126 - NOTAM PROLIFERATION

Thank you as always for your excellent publication – essential reading in our organisation.

I wonder if I could express a ~~slight~~ difference of opinion from the pilot who offered the 2nd report of the issue. The one in which a commercial Heli pilot in transit from Blackpool to London had difficulty with the proliferation of NOTAM information for his route. While I acknowledge that the system is flawed, with a surfeit of information that needs to be tediously and carefully examined, I strongly disagree with his recommendation(s) for filtering. Specifically:

"As ninety percent of these warnings occur within areas where flight below 500' agl would be against the law due to proximity of Person, Vehicle, Vessel or Structure can we press for notifications only above 300'(obstacle/kite/balloon data) and 400'(drone data as this is the legal maximum height)?"

His interpretation of "the law" may be accurate for his particular type of operation, but certainly does not pertain to us in the powerline business. Our Ops Manual allows for operation at heights well below 500ft in Congested Areas, reducing to ground level outside these, and operation with horizontal and vertical separations well below those required for Public Transport or Private flying. The filtering your reporter recommends would deny us essential, safety-critical information.

The 'CHIRP comment' section correctly highlighted the current-best way of processing the information – using EFBs (correctly attached to their power supplies, of course ☺), tablets or similar, as well as having the CAA and industry/interested users engaged in 'brain-storming' the problem through seminars and related activities. We acknowledge the wishes of fellow-users of UK Airspace to be able to process all the information they need to ensure a safe, legal and happy outcome to their endeavours, and ask that they extend to us the same understanding.

***CHIRP* Comment:** Good points – well made. Thank you.

From the SKYbrary website:

> A NOTAM is a notice containing information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard, the timely knowledge of which is essential to personnel concerned with flight operations. (ICAO Annex 11: Air Traffic Services).

Clearly, when assessing what is timely and essential it is necessary to take into account all types of operations. We have insufficient knowledge of the Flight Service Bureau to offer an endorsement but Readers from all disciplines may be interested in contributing to their trawl for ideas and opinions accessible by following this link.

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PRESSURE TO OPERATE INTO DISCRETION DURING BAD WEATHER

Report Text: Crew were initially scheduled to fly 2 sectors but upon arriving at the airport were advised they would be operating 4 sectors. First 3 sectors completed with minor delays. After boarding for the final sector a shower of moderate freezing rain passed the airport. As [operator] does not allow operations in these conditions crew had to wait for the shower to pass. Once the freezing rain had passed the aircraft was de-iced as crew anticipated an imminent departure. During de-icing ATC advised crew of a slot at approx. 2 hours later. Due to poor weather in the UK there was no chance of this slot improving. To depart at this time would have required the use of Commander's Discretion. The flight crew decided not to do this as they felt they would be too tired to safely operate at this time in the demanding weather conditions that were present across the throughout the route and our destination. Captain immediately contacted operations to advise of the situation. Operations tried to persuade the Captain to operate the flight as it would only take the crew into discretion by one hour. Captain stuck to the decision to not exercise discretion and organised for the passengers to be returned to the terminal building.

Lessons Learned - Airline operations should not try to force tired crew to operate and respect Commanders' decisions with respect to extending duty periods.

***CHIRP* Comment:** Commanders' decisions over the use of discretion must be final and should not be challenged by ops staff. Captains are generally disposed to extend duties to meet passenger and Company expectations provided it can be done safely. Declining to use discretion is not done lightly and ops staffs should limit their questions to those necessary to implement the Commander's decision and make appropriate arrangements for the passengers, crew and aircraft. It is not unreasonable for Commanders to be asked to explain their decisions in the days following a declined use of Discretion and Commanders should have no difficulty in doing so. In the reported occurrence the crew had already had their day extended beyond the rostered 2-sectors; a subsequent delay and the expectation of demanding conditions on the last sector were appropriate reasons for declining to use discretion – a decision supported by the reporter's local supervisor.

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CERTIFYING ENGINEER AS STORES SUPERVISOR

Report Text: I'm hoping you can help me as other avenues of enquiry have not been successful. Not really reporting an issue but asking a question.

[ ] have a small outstation in [ ], of which I am the Station Engineer. Due to the very small team based here our resources are limited. In order to get the station up and running we have had a storeman on site for the last six months. As he is now due to return to his home-base the company is asking me to complete a "goods in inspector certificate" course and carry out the duties associated with that role.

My question is this: Am I allowed to receive a component from a supplier, inspect and accept into our stores and then, subsequently, also draw that item, fit and certify on the aircraft? To my mind, if we do this then we are taking away one layer of protection from the whole process, i.e. a different set of eyes inspecting the item into stores to that which inspects prior to fit? I am well aware that the onus is on the certifying engineer to ensure whatever they fit is correct but we all know the pressures of line maintenance and there is the danger of complacency with the "I've inspected this once already" mentality creeping in.

I have approached the CAA on this topic. Their response was "contact the surveyor responsible for your organisation or your regional office". I'm reading between the lines but I suspect they don't know. I have also approached my own QA department but they will not be drawn to give an answer on paper – only verbally. Again, this makes me suspicious of the facts behind the answer. With appropriate training the inspector role should not be complicated but I would like to see some written legislation which allows us to do this. Could you possibly direct me to the answer please?

***CHIRP* Comment:** The answer to the reporter's question is "yes". Engineers are permitted to receive a component, inspect it and accept it into stores then draw the component, fit it and certify it on the aircraft. The inspection on receipt must be recorded separately from the inspection prior to fit. The same principle, an additional level of inspection and recording, applies elsewhere to allow the same person to carry out a task then to certify that it has been completed correctly. It was a puzzle that the reporter's QA department would not

confirm in writing their entirely correct response to the reporter's question. When engineers at the coal face have questions about procedures, every effort should be made to answer their questions in full, first time and without delay; they are doing what we encourage everyone to do when concerned about safety: ask!

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Ride Reports

Report Text: I have flown to the US for over twenty years and am used to chuckling with colleagues in the flight deck about the amount of our friends from 'across the pond' who constantly asked about ride reports.

In the last year or so there seem to be an increasing amount of Irish requests for ride reports closely followed by 'the world's favourite'.

My main question is why? In one of the most congested airspace areas in the world is this necessary. Severe turbulence, even moderate turbulence yes but a 'ride report?'

Lessons Learned - Yes. Please be quiet on the radio unless necessary!

***CHIRP* Comment:** We agree with the lesson learned. Frequent requests for ride reports in benign conditions can become wearing and distract from the occasions when advice about turbulence is useful. However, the rationale for many of the requests for ride reports is that some carriers require their cabin crew to be seated whenever the fasten seatbelt sign is on. Therefore, in order to determine whether there will be an uninterrupted period of appropriate length for the cabin service being planned, the pilots are seeking information from the best source – pilots ahead of them.

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Abuse of Distress Frequency

Report Text: It is now a regular occurrence when monitoring 121.5, particularly (for example) in Holland, France and Germany that individual(s) are transmitting obscenities and disgusting noises on 121.5. One can only assume that they seek attention. It has occurred in several different geographic areas indicating that it is flight crew. Anecdotally colleagues have indicated that it is only a few individuals and that they are single pilot commercial operations.

The writer has reported this to the area control frequency being worked at the time but our European ATC colleagues seem unwilling to take action.

We are instructed to always monitor 121.5 by company but this is extremely distracting not to mention dangerous behaviour when someone genuinely in distress will be deprived of immediate contact. All agencies must act to identify such unprofessional behaviour.

***CHIRP* Comment:** Abuse of 121.5 is a problem in NW Europe, less so in N America and rarely occurs in the Middle East. In addition to blocking the channel for distress messages, abuse of 121.5 prompts pilots to turn down the volume and thereby remove a safety barrier in the event that communications are unknowingly lost with ATC.

Unfortunately this appears to be one of those issues that pilots have become resigned to having to cope with. It doesn't have to be that way. The French authorities have been heard admonishing someone for transmitting inappropriately on 121.5 but it is not clear whether the inappropriate transmissions were being made from the air or the ground. Transmissions from the ground would be unlikely to be heard by ATCUs unless the transmitter is close to an ATC receiver. The only reliable way to address the issue is for pilots to report it every time it occurs. Enough reports will, like the problem with lasers, eventually raise the profile sufficiently for action to be taken.

CHIRP has forwarded the report to EASA and Eurocontrol for their information/advice.

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Nutritional Opportunities

Report Text: AMC1 ORO 240 says that the airline have to specify how they ensure nutrition.

My company says the responsibility lays with the Commander without more explanation how that can and will be done.

My question is if that is satisfactory to the Authority?

Follow up Information from Reporter: It's not possible to bring food for a whole tour (up to five days) abroad with my company unless it's either canned or dry stored. Early mornings away from base makes it impractical to bring fresh vegetables or fruit. One then has to shop locally for the next day's duty and with no fridge in the hotel you can understand the problem.

Many of the hotels we use do not offer breakfast as the company have negotiated down the price and say now it's the individual's responsibility to sort out.

Daily duty pay should cover this cost: an allowance paid per hour away should cover three meals per day with both food and drinks regardless of where we are on the route network.

I am concerned with my colleagues not having breakfast in the morning and only getting a sandwich if it's left over from passengers' catering. Several times I have flown with people not having anything but sandwiches and or cookies until back from duty, 11 hours later.

My responsibility? Without a proper directive I cannot do much more than say to the crew they need to be careful.

***CHIRP* Comment:** The Operator requires crew members to provide their own food, paid from the duty subsistence allowance. In response to the report, the Operator conducted an investigation and updated its HOTAC selection checklist to ensure food is available at or near the HOTAC or airport location at appropriate times. It also examined its network structure for potential problems; where it was identified on a specific duty that a crew member would not be in a position to buy or acquire food, food is now provided. Any safety report with reference to nutritional breaks will be forwarded for review at the Operator's Fatigue Safety Action Group (FSAG) where verification action to confirm the effectiveness of the rectification action will take place.

CHIRP is grateful to the reporter for raising this important safety issue and to the Operator for its comprehensive reaction to the report and sharing the results of its investigation.

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ATC Questioned Early Turn on Filed Route

Report Text: This flight occurred during day VMC during cruise phase of quick 15 minute flight from Farnborough to Northolt on an IFR flight plan. 3 crew (2 pilots, 1 flight attendant). Flight plan route was Farnborough//HAZEL OCKHAM//Northolt.

After take-off and departure vectors at 4000ft and between 230-250 kts we were given direct to HAZEL which was as I recall a south south-easterly heading. My co-pilot was the flying pilot and the autopilot was on using the Honeywell FMS programmed routing HAZEL OCK.

As the non-flying pilot in the right seat (and the Captain) I was completing climb, cruise, level, descent checklists which required my heads down getting Northolt ATIS, programming FMS for arrival ILS 25, and setting landing performance functions of FMS. As we were approaching HAZEL I was busy and not monitoring the navigation systems or flying pilot as I thought things were well under control.

We then received a call from ATC asking where we were going, to which I looked up to see NAV display illustrating the aircraft starting a turn from towards OCK. I asked the flying pilot, ok what are doing, and he said we are now turning to OCK. I replied to ATC on the VHF that we were now going to OCK. She asked why and stated that we weren't close to HAZEL (maybe 7 miles from HAZEL). I delayed a moment trying to get caught up on the navigation situation (I had been heads down) and realized the autopilot was still on, FMS was in LNAV mode with no errors displayed, the winds were 40 kts south-westerly and it appeared to me the FMS/autopilot was executing a winds corrected smart turn and leading the turn so as to intercept the course from HAZEL to OCK. I think we were 5 miles from HAZEL at that time.

ATC directed us to a heading of 040 (vector to OCK) and the flying pilot commanded the FMS heading mode now to do so. As our heading was passing through 050 ATC told us we need to start our turn to which I responded to ATC that we were in the turn and that we were passing 050 in the turn to 040. ATC then responded telling us that it looked like we weren't turning yet. I think I may have said maybe the winds but I'm not sure if I mentioned it to her. It could have been that the flying pilot and I discussed the winds and that it may be affecting how our ground track appears on ATC radar. We would have exceeded that corridor for HAZEL to OCK if we didn't lead the turn though as the winds would have blown us well past.

At no point did we get any Traffic Calls or Resolution Advisories and traffic didn't seem to be an issue by the radios calls heard and the contacts displayed on our navigation display. There was no more mention of this from ATC and rest of flight uneventful.

Lessons Learned: I think our aircraft speed 230-240 was too fast considering 40 kts winds pushing us and the healthy turn angle required from our position to HAZEL and then fly track to OCK. My opinion is the angle was so much that based on the ground speed the FMS computed a smart turn that was not what ATC expected. A slower speed would have produce a FMS wind corrected smart turn with less lead time/closer the waypoint.

Additionally, had I known we were turning that early (I was heads down completing required non-flying pilot flight duties) I would have given ATC a heads up to confirm there was no expectation for us to consider HAZEL a "fly-

over" waypoint (since the FMS smart turn doesn't actually fly over a waypoint unless its programmed as a "fly-over" waypoint).

***CHIRP* Comment:** Radar recordings confirmed that the reporter's aircraft was 9nm from HAZEL at its closest point of approach. Aircraft on the route are expected to turn early – but not that early! The reporter was surely correct in their analysis that a lower airspeed would have been sensible but not just in those wind conditions. On such a short route the crew would also have been well advised to complete all the possible checks and obtained the Northolt weather before taking off from Farnborough. This would have enabled the Commander to monitor the co-pilot more effectively.

FEEDBACK readers may wish to be aware of CAA Paper 2013/02: Monitoring Matters which was written to promote a better understanding of the monitoring discipline and which is highly recommended.

The CHIRP report highlights an interesting phenomenon with relevance to the introduction of PBN: i.e. differences in the way FMS calculate turns. FMS from different manufacturers calculate turns differently but there are also differences perceived in the performance of FMS produced by individual manufacturers.

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And finally, a couple of opportunities for pilots to assist in NATS controller training.

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