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Mr XXXXXXXXXXXXX
Manager XXXXXXXX
CAA
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Good Morning Sir,

Re: CAO 48 - Flight and Duty Times ARP

I was recently advised by the HAA that you are managing the ARP for the above CAO.

I would appreciate if you could accept this letter as a submission.

OVERVIEW

AeroStar has been at the fore front in conducting Helicopter Pilot Safety Awareness Courses for the GA industry.

We have been instrumental in having 200 Pilots and some CAA members attend about 9 courses in the last 13 months.

These attendees have helped us identify the major reason for helicopter maintenance release hours blatantly not being recorded.

The Robinson R22 has a requirement for its airframe time to be recorded accurately from the aircrafts' Hobbs meter. Many of the 220 aircraft have the Hobbs meter disconnected to help fraudulent recording take place.

Other helicopters have No accurate recording device in situ and rely on the pilot to record flight times in the maintenance release.

Most helicopters are engaged in Aerial work operations and as such (the Line Pilots) are under direct control of the Chief Pilot.

Australia has a unique, seasonal environment which dictates the majority of helicopter operations to be conducted as aerial work i.e.: Ag spraying or mustering.

As such, the work has to be carried out on demand and within certain time / weather constraints.

Due to these unique constituents - time and distance - many pilots are unable to meet the requirements of CAO 48 - the recording of flight and duty times.

A typical scenario is as follows:

Every year the pilot's log book and duty records are inspected by the CAA as part of Company Operational Inspections. Due to lack of CAA resources - some operators and pilots are not checked regularly.

As most of the high intensity seasonal work in this country is cattle mustering - the pilot is unable to legally meet the requirements of CAO 48. A normal winter day in Australia would see approx 600 operational hours flown by helicopters.

Many pilots fly 8-10 hours per day for 5 or 6 days of the week. They "Fudge" their flight and duty times, personal log book and aircraft maintenance release to fit the CAA requirements. As the Hobbs meter has to match up with the maintenance release and log hours etc - it is disconnected to hide flying hours with the intention of "making it up in the future" and of course this never happens.

After a period of time they have no idea of the actual hours they and the machine has flown and the lie perpetuates.

The majority of light helicopters which have correct hours recorded are at the flying schools as they are rigidly monitored by the CAA. When you think about it - they must retain student training records/files etc and it would be impossible to "doctor" the hours even without CAA inspection. These schools are also close to most CAA regional offices and require little effort from the CAA Inspectors to keep an eye on things.

However - you can imagine the fraud going on away from the towns!!

This abuse has been known to the CAA and nearly all members of the Helicopter Industry for many years.

Present Cost factors, especially in remote areas, prevent CAA practical surveillance.

On the human side - how would you like **for the rest of your life** to daily fill in an extremely complicated form that dictates every hour of your working life and most of your off duty schedules!

I propose the following simple solution:
AN EXEMPTION FROM CAO 48

That: Pilots of Helicopters operating under aerial work conditions be required not to keep a flight and duty time log other than their personal flight log book and maintenance release entries.

REASON

1. The duty of care for a safe operation must lie with the Chief Pilots responsibilities, as indeed it now does.

The Chief Pilots should arrange pilot rosters (if required in the company ops manual) to avoid fatigue situations.

2. This solution means that there is no law or penalty (CAO 48) to beat and hours would be recorded as all pilots are keen to have personal log books indicating flying experience.

3. It should be noted **that no increase in the recorded accident rate should happen** due to fatigue - as the pilots are presently doing as they have been for the last 20 years, flying the hours as needed and fudging the paperwork to suit.

Some members of BASI support this notion.

4. If the pilot records his actual hours correctly in his log book and the aircraft maintenance release - **the industry will be safer** as limited life parts will be identified for replacement at their correct interval and accurate statistics of actual flying time in the industry can be gathered.

5. This simple approach to flight and duty times (the Chief Pilot being responsible for safety) would **cut costs to the industry and to the CAA** in Policing documents (the flight and duty times) which are in actual fact falsely presented to "fit the requirements".

6. **I propose no changes to charter ops flight and duty times as Public Safety is paramount.**

This proposal has been supported by every pilot we have spoken to.

Best Regards

Tony Carmody
23 June 1994

Food For Thought:

For every day of your working life as an Aerial work Pilot -

How would you like to come home late in the evening after a hard days work and spend a lot of time doing the following sequence:

Total and separate out the revenue and non productive minutes of the day

Fill in company work records such as invoices etc

Then start the process of fudging the Flight and duty times as follows -

Duty times - fill in the rostered hours column - time on, time off. (unrealistic)
fill in the actual hours column - time on , time off (mental fudging to suit)
fill in the total daily duty hours (fudge!)
fill in the total progressive duty hours for the last 14 days (fudge again)

Flight time - fill in the rostered daily flight time (tell the cows this one!)
fill in the actual hours flown (fudge for the CAA)
add or subtract the hours flown 7 days ago to give (next column)
work out the total hours flown in 7 days (complete fudge)
Add or subtract the hours flown 30 days ago (they were false anyway) and
work out the total hours flown in 30 days.

then - work out the flight time for the last 11 months so as not to exceed the CAA limits

then - work out the flight time available for the next month .

next - fill in the aircraft maintenance release for the hours flown that day (usually false because of the above flight and duty times)

then - fill in your pilot log book making sure it fits the maintenance release and flight and duty times.

then get cheesed off with it all because the system is out of touch with real life and you have to lie to remain in your profession.

Remember! - This is compulsory every day of your working life!!!! !

It's fine for airlines where the pilot can sit in a comfortable seat filling in time and paperwork as they fly from A to B in a couple of hours.

It is a silly requirement for Agricultural or Helicopter Pilots whose work environment does not revolve around scheduled flights and passengers but rather Nature, seasons, animals crops, weather etc. etc.

No wonder Aerial work Pilots are not disposed to the CAA Regulators who aren't experienced in the pilots operating environment.