

they pertain to reducing the required hours. Two commenters state that since the rule requires at least 2 operating cycles (at least 2 as the pilot flying), then PICs and SICs should be allowed to reduce the operating experience time by one hour for each takeoff and landing following the two operating cycles that are required. These commenters also say that the reduction should apply to initial, upgrade, and transition categories.

United Airlines says that "hour requirements for transition training PICs should be reducible for cycles for Group II airplanes just as is proposed for Group I airplanes" and that "if transition training SICs in Group II airplanes also had a 25 hour requirement instead of 15 hours, that time should also be reducible for cycles."

RAA says that the proposed rule "appears to limit the reduction option in Group I airplanes to transition only" and that this option should also apply to initial and upgrade training.

ALPA agrees with the proposal because it would "eliminate the capability to reduce the required hours of supervised operating experience according to the number of takeoffs and landings for all pilots except those transitioning as pilot in command" and that "this will allow an additional amount of time for pilots to become comfortable in their operating seat in their operational environment while under supervision."

#### *FAA Response*

The proposed and final rule state that flight crewmembers may substitute one additional takeoff and landing for each hour of flight up to a maximum reduction of 50 percent (with the exceptions described above). The FAA intends that after completing the four required cycles, a pilot may achieve a reduction in required flight hours for each additional takeoff and landing. This is intended to ensure that pilots obtain adequate hours of line flight experience while still recognizing that short flights, with frequent takeoffs and landings, may provide experience equal to longer flights.

The change that will not allow a reduction for PICs meeting initial operating experience is necessary because of the importance of PICs gaining additional experience operating an aircraft's sophisticated automated equipment during initial operating experience. Both the increase in hours in this category and not allowing any reduction in hours reflect the need for thorough experience in operating the different equipment installed in the airplane. Likewise the reduction for

SICs in Group II airplanes has been eliminated because SICs have more responsibilities in the more sophisticated aircraft that have two-person cockpits.

The reduction continues to apply to all pilots in Group I airplanes.

Although the FAA has made no substantive changes to the rule language in the NPRM, paragraph (f) has been rewritten to make the intent clearer.

#### *Section 121.434(g)—Consolidation*

This new rule requires that PICs and SICs acquire at least 100 hours of line operating flight time for consolidation of knowledge and skills within 120 days after satisfactory completion of a type rating practical test or an initial proficiency check. In the NPRM, the FAA specifically requested comments on the feasibility and adequacy of the 120-day period. The committee recommended that consolidation consist of 100 hours of line operating flight time and that if the 100 hours was not completed in 120 days, an airman must receive additional training before extending the consolidation period.

Seven comments were received on this requirement. Three commenters say that the 75-hour threshold used for crew pairing (121.438(b)) should also be used for consolidation rather than 100 hours. These commenters say that 75 hours would be sufficient as a minimum number of flight hours within the 120 days to ensure that the newly-acquired piloting skills are not lost once training and testing have ended. In addition, using 75 hours would simplify tracking and recordkeeping requirements associated with both consolidation and crew pairing. Finally, RAA comments that using a 75-hour requirement is further supported because this was the number originally used in the Task Force recommendation.

ALPA recommends that the consolidation period be reduced to 100 days or that refresher training be required. This would ensure the newly trained pilot a timely completion of consolidation with as little interruption as possible.

ALPA also responds to the FAA's projection that 10 percent of crewmembers would not be able to complete consolidation in the required time by saying that airlines should be able to allow crewmembers in consolidation to get the required flight time. ALPA states that during a pilot's consolidation period, instead of being assigned to reserve status, airlines should be able to schedule these crewmembers on a regular basis without any additional costs being incurred. Further, ALPA says that if an airline

displaces a line holding pilot to let a reserve pilot fly, there should be no net cost increase because pilots assigned to reserve status are guaranteed monthly minimum pay by the airline regardless of how many hours they fly.

Two commenters, United Airlines and ATA, say that in certain short range operations, consolidation will occur long before the 100 hour requirement is met because of the cycles flown. ATA says that the experience gained by pilots involved in short haul operations from multiple departures and takeoffs should be recognized by the FAA. These commenters therefore recommend a reduction of required consolidation line operating flight time at a rate of one hour for one cycle to a maximum of 50 percent reduction in hours.

RAA says that the proposed rule does not ensure that the clock (to complete consolidation) would begin at the same time for individual pilots. RAA says that it is possible that a PIC and SIC who were checked the same day in the simulator and completed their checks the same day in the aircraft would not have the same time remaining to complete the 100 hours of experience. Thus, RAA recommends that the phrase "Any part of" be removed from § 121.434(g)(1).

Alaska Airlines says that the consolidation requirement would have a great economic impact on air carriers because senior pilots would be displaced by junior pilots needing to complete consolidation requirements. Alaska adds that labor unions might not be willing to "forgo the seniority benefits assured within their agreements without first demanding compensation for those affected by the loss of their seniority rights."

#### *FAA Response*

There is no reduction in consolidation hours allowed for the number of takeoffs and landings. While operating experience hours may be reduced in accordance with revised § 121.434(f), consolidation hours may not be reduced. As stated in the NPRM preamble, the crew pairing committee concluded and the FAA agrees that it is important for a pilot who has qualified in an airplane to have an opportunity to consolidate the newly developed piloting skills and procedural knowledge through substantial line operating experience in the airplane within a reasonably short time after completing training and satisfactorily demonstrating proficiency. Pilots who have satisfactorily completed training and demonstrated proficiency in an airplane and who do not soon thereafter consolidate the newly acquired