

Over the years 1994–2003, the requirement that transitioning PIC candidates of Group II airplanes receive an additional 10 hours of supervised operating experience will cost \$45.6 million, with a present value of \$31.5 million.

Section 121.434(f) of the existing rule allows air carriers to reduce the number of hours of required PIC operating experience by 50 percent by substituting an additional takeoff and landing for each hour of flight. The hours of operating experience for PICs who meet transition training requirements may be reduced by one hour per landing. Although the final rule increases the number of hours of operating experience for transitioning PICs, the allowance for landings in this provision results in a smaller increase in the costs of the additional operating experience hours. The FAA estimates that the savings will be 10 percent of the incremental costs of additional PIC transitional operating experience requirements in Group II airplanes. Over the years 1994 to 2003, the cost savings will be \$4.6 million, with a present value of \$3.2 million.

The final rule will prohibit the reduction of the required number of operating experience hours for initial Group II PICs. The FAA estimates that under the current rule, the hourly requirements could be reduced by 10 percent by the allowance of one hour per landing and takeoff. Because the final rule removes this allowance, however, it will add the expense of a check pilot for those hours currently reduced. The FAA estimates that the additional cost of prohibiting a reduction of operating experience hours for initial Group II PICs in 1994 equals \$99,000 (312 pilots × 25 hrs. × \$127/hr. × 10%). Over the next 10 years, the total cost will be \$1.1 million, with a present value of \$789,000. When this cost is added to the other costs of complying with the new PIC operating experience requirements over the next 10 years, the total cost will be \$42.1 (45.6 – 4.6 + 1.1) million, with a present value of \$29 million.

Consolidation of Learning and Skills

Section 121.434(g) of the final rule will require candidate PICs and SICs to acquire 100 hours of line operating experience for consolidation of knowledge and skills within 120 days after the completion of one of the following requirements:

- An airline transport pilot certificate with type rating practical test;
- An additional type rating practical test; or

—A proficiency check for those pilots who already possess a type rating in that particular aircraft.

The final rule will also require that if a pilot who is consolidating his or her skills performs any flight time in another type of airplane operated by the certificate holder before completing the 100 hours, that pilot will have to successfully complete refresher training before returning to the new airplane type. This refresher training will have to be conducted by a qualified instructor or check pilot. If the pilot did not complete the required 100 hours of line operating flight time, the certificate holder could extend the 120-day period to 150 days. In this instance, however, the pilot could be subject to refresher training if a check pilot determined that the pilot had not retained an adequate level of proficiency in the new airplane type.

Section 121.438(a) of the final rule will prohibit SICs who have less than 100 flight hours in the airplane being flown from making takeoffs and landings, unless the PIC is a check pilot, when certain adverse weather and/or runway conditions exist or when the PIC determined that it was prudent to exercise his or her prerogative and make the takeoff or the landing. This restriction will not significantly interfere with the consolidation of learning and skills requirements for SICs, who should be able to acquire 100 hours of operating experience within the 120 days. Therefore, there are no costs associated with this restriction.

The current bidding systems that most air carriers use have resulted in some newly type-rated or proficiency-checked pilots being placed on reserve for the airplanes in which they have recently received practical tests and/or proficiency checks. Thus, these newly rated pilots may not have the opportunity to consolidate their skills.

The Joint Government/Industry Task Force on Flight Crew Performance included a consolidation requirement among their recommendations to the FAA. The FAA finds, therefore, that the current bidding systems could be modified to ensure that affected pilots could consolidate their skills within a 120-day period. To the extent that they fail to do so, there would be additional costs of compliance. The FAA estimates that with current flight times of about 75 hours per month, 90 percent of the affected pilots would consolidate their skills within the 120 days, and all of them would complete consolidation within 150 days. The costs of compliance associated with the 10 percent who could not complete

consolidation within 120 days can be separated into two categories: (1) The cost of a supervised line observation flight conducted by a check pilot; or (2) the cost of refresher training.

Supervised Line Observation

A supervised line observation flight for a pilot is conducted if the pilot is going to take longer than 120 days to complete the 100 hours of operating experience. This flight is estimated to take an average of 2 hours. The cost that this requirement will impose will be the cost of providing a check pilot for those 2 hours. For SIC candidates, the check pilot can serve as PIC. Since there is little if any wage differential between PICs and check pilots, little if any additional cost will be imposed by this requirement. For PIC candidates, the check pilot will act as SIC for that supervised observation flight. This would impose an additional cost since check pilots earn more than SICs. The difference in wage between a PIC check pilot and an SIC ranges from \$62/hour for Group II pilots and \$15/hour for Group I pilots. The total cost of this requirement over the next 10 years is \$508,200 dollars with a present value of \$351,000.

Refresher Training

If a pilot who is consolidating his or her skills performs any flight time in another type of airplane operated by the certificate holder before completing the 120 hours, he or she will have to successfully complete refresher training before returning to the new airplane type. The FAA estimates that half of the PICs and SICs who do not consolidate their skills will require some refresher training. Air carriers have modules that they use to teach different aspects of a training program. The FAA expects that operators will use these modules to provide pilots the additional training in those areas that the check airmen find them to be deficient. The cost of compliance for the requirement for refresher training, therefore, would be the cost of instructors for those PICs and SICs. The FAA estimates that the refresher training will take an average of three hours and that Group II airplane instructors will be compensated at \$127 per hour and Group I instructors at \$55 per hour. In 1994, this cost will amount to \$218,000. Over the years 1994 to 2003, the costs will total \$2.5 million, with a present value of \$1.7 million.

Developing Computer Programming

Section 121.438(b) states that “no person may conduct operations . . . unless, for that type airplane, either the PIC or the SIC has at least 75 hours of