

July 25, 2013

Mr. Raymond Benjamin, Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec, Canada, H3C 5H7

RE: AN 12/11.6-13/56 — Proposal for the amendment of Annex 1, Annex 6m Part 1 and PANS-TRG relating to upset prevention and recovery training.

Dear Mr. Benjamin:

IAOPA would like to formally record our opposition to the recommendation to make upset prevention and recovery training (UPRT) for the CPL and/or any certificate level for which the training would be provided in an aircraft.

The recommendation for UPRT has been borne from a number of fatalities resulting from LOC-I events involving commercial air transport airplanes which led to an examination of current training practices by several organizations. The unfortunate accidents solely occurred at the air carrier operational level and IAOPA would recommend the training be developed and occur there.

By recommending the training occur at the CPL level, the costs will be borne solely by the applicant pilot. Inquiries made to some of the largest U.S. aviation universities expressed great difficulties with maintaining their current aircraft used for aerobatics and spin training at the flight instructor level. All costs incurred would be passed directly onto the student, significantly raising the costs of their training.

To expand the use of existing aerobatic aircraft and add additional aircraft would prove difficult. In the U.S., most aircraft capable of UPRT are either experimental or aging aircraft. Additionally, there are relatively few manufacturers producing type-certified aerobatic aircraft. Most importantly, these aircraft handle and operate nothing like an air carrier aircraft. But even if the training provider had an adequate fleet of UPRT capable aircraft, there are relatively few instructors capable of teaching UPRT effectively and safely.

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Training to recognize an aircraft upset should be in a simulator which properly represents the environment and handling characteristics of the aircraft flown. In almost all the accidents studied, there was a failure of the crew to detect, or appropriately respond to an impending threat, and to recognize or accurately analyze the circumstances surrounding the upset condition. Teaching an airline crew to recognize and detect the impending threat is most important and can, and should, be accomplished in the safety of a simulator.

In the U.S., most general aviation loss-of-control accidents occur at altitudes insufficient to recover – making it imperative the pilot recognizes and prevents the upset from occurring. By better training the recognition and timely correction, through both training and technology, recovery training becomes secondary.

Commercial pilots have a number of career paths to choose from, not only the airlines. In the U.S., a commercial pilot can go on to several different types of operation such as banner towing, agricultural applications, photography, or flight instruction. It would be inappropriate to recommend training at a certificate level which may or may not see the operational scenario which the training is attempting to prevent. If however, the pilot goes on to fly for an air carrier, that certificate level, ATP or otherwise, would be the appropriate certificate for the training.

Lastly, to our knowledge there has never been a proper empirical study on the costs and benefits of UPRT. There are many questions that need to be answered before a recommendation for training, especially in an aircraft, should be made.

For the reasons stated above, the time needed to better study the issue and answer important questions; we respectfully ask the commission to drop its recommendation to make upset prevention and recovery training for the CPL and/or any certificate level for which the training would be provided in an aircraft.

Respectfully submitted,

Craig J. Spence
Secretary General