February 26, 2016

The Honorable Christopher A. Hart
Chairman
National Transportation Safety Board
Washington, D.C. 20594

CC: Jeffrey Marcus, NTSB

VIA emailed PDF to correspondence@ntsb.gov, MARCUSJ@ntsb.gov

REF: Safety Recommendations A-10-102 through -104

Dear Chairman Hart,

This letter provides our final update concerning the above referenced Safety Recommendations and our prior responses regarding them.

As described below, we believe the implementation of the three recommendations of the NTSB has been very successful. In inquiries we have made of the groups while attending our national conferences and in other communications with many of them we believe the groups have taken the recommendations seriously and taken steps to implement them.

We do not consider this process will ever be complete. Because the groups are so diverse and have regular turnover among their volunteer pilots and their staffs, both volunteer and paid, we will always be continuing to promote the NTSB recommendations, including disseminating the information and our recommendations and requesting information from the groups regarding their procedures.

In addition the online multimedia safety course and initiated by the Air Care Alliance (ACA) and the Aircraft Owners and Pilots Association AOPA Foundation Air Safety Institute has been accepted and utilized well beyond our expectations, as noted herein.

The following comments address each recommendation:
NTSB Recommendation A-10-102:

The Air Care Alliance recommended and urged that every Volunteer Pilot Organization (VPO) institute procedures to reinforce requirements for pilot currency under Federal Aviation Regulation 61.57 and to verify pilot currency by, at a minimum, requiring written or electronic self-certification of currency by the pilot in command before every flight.

Groups reporting compliance indicated that they require and are able to depend on pilots’ self-certification regarding qualifications and currency. Most groups actually have higher than the FAA’s minimum experience requirements, appropriate for the kind of flights a group offers and the conditions expected in the region in which the flights are made.

NTSB Recommendation A-10-103:

ACA has recommended and urged that every VPO disclose to passengers at the time of inquiry or early during the intake process that the flights are operated by volunteer pilot and are not commercial flights (airline or charter) and that the pilots, aircraft, and flights are not required to meet the same standards as commercial flights.

Groups reporting compliance have reported that they include this kind of information in the documents provided to those requesting flights and to their passengers during their intake procedures and that they require the passengers to sign documents affirming that they understand the flights are not commercial in nature.

NTSB Recommendation A-10-104:

In actuality ACA has long urged all the groups involved in volunteer-based public benefit flying to embrace a culture of safety and work with their volunteer pilots to minimize risk and regularly improve safety of operations.

In fact, ACA worked with AOPA and its safety group, then called the AOPA Air Safety Foundation, to develop a video and companion book called “Volunteer Pilots: Recommendations for Enhanced Safety,” released in 1999. It was widely distributed and made available to all the ACA listed VPO’s and made freely available to them to distribute to their pilots.

More recently, as promised by ACA in response to NTSB Recommendation A-10-104, ACA collaborated with the AOPA Foundation’s Air Safety Institute and many ACA Member groups to develop an interactive online multimedia safety course addressing aeronautical decision-making; proper preflight planning; pilot qualification, training, and currency; self-induced pressure; and other subjects appropriate for volunteer pilots providing public benefit flights.

The course is called “Public Benefit Flying: Balancing Safety and Compassion” and is available on the web at [http://www.aopa.org/Education/Online-Courses](http://www.aopa.org/Education/Online-Courses). The course is available to the public and no fee is required. AOPA and ACA have also worked with the FAA to qualify the course for FAA Wings program proficiency training credit. The course is described by AOPA as follows:

“You're passionate about flying. And maybe, you've toyed with the idea of using your flying skills to help out others. But, what does it take to become a volunteer pilot? The course's flight profiles and interactive decision-making scenarios quickly help you understand how volunteer flying demands professionalism..."
and responsibility—far beyond that of a leisurely personal flight. Learn how to mitigate pressures and recognize treacherous mindsets that could cause harm. Become an expert at managing risk. You’ll be rewarded with the knowledge that your passengers' safety and comfort are well cared for.”

In addition to very substantial project support from the AOPA Foundation, a number of ACA Member organizations as well as support groups have provided significant and generous contributions, and ACA itself also helped finance the project.

ACA recommended and urged that each VPO utilize the course and other available safety materials appropriate for their operations so as to achieve an enhanced culture of safety among its pilots. ACA also recommended that every VPO require each pilot to obtain recurrent training annually, which may include flight training, attendance at seminars, and/or use of web-based training materials including the “Public Benefit Flying: Balancing Safety and Compassion” course.

Groups reporting compliance have indicated that they do require their volunteer pilots to take the course and have found it extremely valuable. In fact a number of groups also require their flight coordinators and other appropriate staff, whether pilots or not, to take the course so as to become familiar with the issues facing pilots in conducting flights.

The outcome has been remarkable and highly successful. AOPA’s most recent report indicates that as of January 31, 2015 a total of 10,037 course completions have been recorded. This is much higher than expected and is a tribute to the groups and their pilots that they have taken the recommendation seriously.

**Conclusion:**

While we believe the outcomes above should satisfy the NTSB’s need for closure regarding the Recommendations, we do not consider our work to ever be done when it comes to improving safety of flight.

ACA will continue to remind and urge the groups and all their volunteer pilots to continue to implement all three recommendations on a continuing basis and especially to utilize the AOPA online course and other appropriate safety materials to enhance their safety programs and pilot training requirements.

Sincerely yours,

Jeff Kahn, Chairman

Rol Murrow, President

Lindy Kirkland, Executive Vice President

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