

July 19, 2023

Vote NO on Amendment #10 (*Langworthy #5*) offered to H.R. 3935

Dear Colleague,

I write to encourage you to vote NO on amendment #10 (*Langworthy #5*) offered to H.R. 3935, the “*Securing Growth and Robust Leadership in American Aviation Act.*” Amendment #10 would strike section 546 of H.R. 3935, a critical provision that seeks to enhance airline pilot competency and training. Specifically, section 546 improves the quality of pilot training by allowing a pilot to leverage high-tech full motion simulators to prepare for and practice how to respond to extreme flight situations before facing them in the cockpit. Section 546 would allow certain pilots pursuing an Airline Transport Pilot (ATP) Certificate to count an additional 150 hours, for a total of 250 hours, as flight hours logged in state-of-the-art flight simulators. As a professional pilot, I understand the importance of real-world training and believe that the additional time in simulator hours will promote aviation safety by ensuring pilots safely practice simulated events before ever experiencing them in a real world and promotes more access to training and development.

I ask that you join me in opposing amendment #10 (*Langworthy #5*) offered to H.R. 3935 in an effort to maintain the highly negotiated language in the bill that my Democratic counterpart, in coordination with the Air Line Pilots Association, the largest union representing airline pilots in the United States, agreed to in the underlying bill. Please find below a Myths & Facts sheet regarding Section 546. Additionally, [here is a letter](#) signed by former Administrator of the Federal Aviation Administration (FAA), J. Randolph Babbitt, and former Acting Administrator of the FAA, Dan Elwell, regarding the pilot shortage and recommendations on how to modernize pilot training - which includes the use of flight simulators.

Chairman

Sam Graves

Myths & Facts about Section 546 in H.R. 3935

The bipartisan *Securing Growth and Robust Leadership in American Aviation Act*, H.R. 3935, includes several provisions to improve the safety of our Nation’s aviation system. I’ve heard some false accusations about a particular provision included in the bill, and I want to take this opportunity to be explicitly clear about what section 546 does and does not do as it relates to pilot training.

MYTH: H.R. 3935 guts the 1,500-hour rule adopted after enactment of the *Airline Safety and Federal Aviation Administration Extension Act of 2010* (hereinafter referred to as the “2010 Act”).

FACT: H.R. 3935 maintains the requirement that a pilot accrue at least 1,500 hours of aeronautical experience, as prescribed by the 2010 Act, to be eligible to obtain an Airline Transport Pilot (ATP) Certificate and be hired by a commercial airline. Current regulations allow for 100 hours of simulator training as part of a Federal Aviation Administration (FAA) approved training course to count towards a pilot’s 1,500 hours. This bill increases this allowance by another 150 hours in advanced simulators, but **under H.R. 3935, 83.3 percent of aeronautical experience will still have to be flight hours.**

BOTTOM LINE: H.R. 3935 does not reduce the total number of hours (1,500 hours) required as a result of the 2010 Act.

MYTH: H.R. 3935 allows an individual pursuing a Restricted-ATP certificate, meaning they may be eligible to become a First Officer for an airline with fewer than the otherwise required 1,500 hours, to avail themselves of the additional simulator hours under section 546 of the bill.

FACT: Section 546(a)(2) expressly prohibits an individual who is pursuing a Restricted-ATP certificate from utilizing the additional 150 hours that H.R. 3935 provides.

BOTTOM LINE: Section 546 would improve the quality of training by allowing certain pilots to leverage cutting-edge full motion simulators that can replicate nearly any condition a pilot may face on an aircraft, including those that are far too unsafe to practice in an actual aircraft.

MYTH: The overhaul in airline pilot qualification and training stemming from the 2010 Act is the reason aviation safety in the United States has improved since 2010.

FACTS:

- Congress passed the 1,500-hour requirement in 2010 in response to the Colgan Air Flight 3407 accident and FAA subsequently adopted the First Officer Qualification (FOQ) Rule (also commonly referred to as the “1,500-hour rule”) in 2013.
 - The FOQ Rule mandated that pilots must accrue six times more pre-hire flight time than was previously required to become eligible to obtain an ATP certificate.
- As a result of the FOQ Rule, commercial pilots with around 250 hours are graduating flight school and then are left to train themselves to bridge the gap and obtain the necessary 1,500 hours to be eligible for an ATP certificate.

- Don't believe me? Former FAA Acting Administrator, Dan Elwell, and Former FAA Administrator and Former ALPA President, Randy Babbitt, noted in a recent letter to Congress that our current airline pilot training pathway results in "most pilots accumul[at]ing over 75 percent of their airline-qualifying flight hours outside of a curriculum and monitored environment." I strongly encourage you to read their letter (attached) in full.
- The 1,500-hour rule had nothing to do with the decline in accident rates. So, what happened to cause the decline?
 - As part of the 2010 Act, and in addition to the changes made to pilot training and qualification, Congress and the FAA:
 - Increased pilot flight duty and rest requirements;
 - Mandated that all airlines adopt safety management systems;
 - Created a pilot records database so bad pilots can't hide by jumping between airlines;
 - Established flight crew mentoring programs; and
 - Increased safety inspections of regional airlines, and much more.
 - Most, if not all, of the above provisions – which are far more costly and onerous to comply with than the 1,500-hour rule – were also adopted by many other countries, and all of those countries saw their aviation accident rates decrease.
 - **However, no other country has adopted the 1,500-hour requirement.**
 - Pilots from other countries – none of which have adopted the 1,500-hour requirement – safely fly in the United States every day.

BOTTOM LINE: Pilot training has not kept pace with advancements in technology. Section 546 looks to make narrow and targeted improvements so that pilots are better incentivized to hone their skills and prepare for extreme flight conditions and scenarios, thus, improving aviation safety.

MYTH: The FAA determined that the 1,500-hour rule was necessary to improve pilot training.

FACTS:

- Congress mandated that the FAA establish the 1,500-hour requirement in response to the 2009 Colgan Air Flight 3407 accident in New York.
- In promulgating the final FOQ Rule in 2013, the **FAA itself "found no quantifiable relationship between the 1,500-hour requirement and airplane accidents."**
- FAA found no link because all part 121, or air carrier, pilots in command have an ATP certificate and 1,500 flight hours, and, in most accident cases, the second in command pilots had 1,500 flight hours.
- Both pilots of the Colgan flight had more than 1,500 hours logged on the day of that tragic accident.

BOTTOM LINE: Quantity of flight hours does not equal pilot quality. Section 546 looks to improve pilot training and competency through the limited increased use of cutting-edge aircraft simulators.

MYTH: Simulators cannot replace flight time in an aircraft.

FACTS:

- After the first 250 hours of pilot training, prospective airline pilots are left to make up the difference to complete the remaining 1,500 hours of training – essentially training themselves.
- Many prospective pilots rack up hundreds of thousands of dollars of debt to rent a small, single engine Cessna 172 and fly pattern work on bright sunny days over and over until they hit 1,500 hours.
- Simulator training guarantees pilots in training are exposed to extreme weather events and emergencies that cannot be safely practiced in flight. Full flight simulators also replicate operations in congested airspace, the multi-crew airline environment, and flight deck emergencies.
- Section 546 also requires the FAA Administrator to consult with the Air Carrier Training Aviation Rulemaking Committee in developing the rule for the additional hours provided for, to ensure such hours are utilized in manner that supplements flying in aircraft rather than supplanting such flight time and experience.

BOTTOM LINE: Section 546 does not advocate for supplanting flight time in aircraft; rather, it proposes to incentivize increased use of cutting-edge flight simulation technologies to supplement flight skills and knowledge.