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The Honorable Sam Graves
Chairman
Committee on Transportation &
Infrastructure
2165 Rayburn House Office Building
Washington D.C. 20515

The Honorable Rick Larsen
Ranking Member
Committee on Transportation &
Infrastructure
2164 Rayburn House Office Building
Washington D.C. 20515

The Honorable Garret Graves
Chairman
Subcommittee on Aviation
2165 Rayburn House Office Building
Washington D.C. 20515

The Honorable Steve Cohen
Ranking Member
Subcommittee on Aviation
2164 Rayburn House Office Building
Washington D.C. 20515

Dear Chairman Graves, Ranking Member Larsen, Chairman Graves, and Ranking Member Cohen:

We write to you today to share our thoughts on the airline pilot shortage and our recommendations on how we believe Congress and all stakeholders can work together to modernize the way we train and qualify airline pilots.

There is no denying that the United States has a very real shortage of airline pilots. As a result, airlines are eliminating markets and curtailing growth. The impacts to domestic air service and connectivity are staggering.

Testifying before the U.S. Senate Commerce Committee last year, Transportation Secretary Buttigieg called the pilot shortage “a national issue” that is “...affecting the whole domestic aviation industry but disproportionately affecting smaller regional airlines.”¹ We agree. And, this national issue requires immediate and focused attention by Congress, U.S. regulators, and all aviation stakeholders. We can and should resolve the pilot shortage, but we must do so while maintaining the incredible safety record we have worked so hard to achieve.

¹ U.S. Department of Transportation Secretary Pete Buttigieg, Testimony before the U.S. Senate Committee on Commerce, Science, and Transportation (May 3, 2022).

Drawing on our combined century of aviation experience,² with more than forty years as airline and military pilots, we recommend the following solutions:

1. Advance regulations governing pilot training and qualification to keep pace with continuous improvements in training programs and technology.
2. Update the pilot training model to achieve better-designed academic and mentored flight training.

Taking both steps will create a more diverse and well-qualified pilot pipeline, ensure greater safety in the training environment, and significantly improve training outcomes.

Before 2013, most regional airline First Officers held a commercial certificate when hired and needed an Airline Transport Pilot (ATP) certificate with 1,500 hours in flight before upgrading to Captain. In the *Airline Safety and FAA Extension Act of 2010 (2010 Airline Safety Act)*,³ Congress mandated that all pilots, including First Officers, must hold an ATP before being hired by an airline. Recognizing the benefits of structured training, Congress also directed the Federal Aviation Administration (FAA) to approve additional qualification pathways with fewer hours but more structured training, when doing so enhanced safety more than fully complying with the flight hours requirement. The FAA finalized the First Officer Qualification rule in 2013, requiring an ATP certificate with 1,500 flight hours for First Officers without approved structured training backgrounds and approving three structured training pathways for First Officer qualification where fewer flight hours but more structured training produced at least an equivalent level of safety.⁴ Today, First Officers qualify with 1,500, 1,250, 1,000 or 750 flight hours, depending on their training background.

While the new First Officer standards set the U.S. apart from the International Civil Aviation Organization⁵ by requiring six times more pre-hire flight time than anywhere else in the world, we are not suggesting that the FAA should revoke these requirements. However, the FAA should continue to advance the regulatory framework it put in place a decade ago, which today fails to allow for, let alone incentivize, the continuous improvement in pilot training that Congress intended.

² Randy Babbitt is a Former FAA Administrator, ALPA President and Airline Pilot. Dan Elwell is a Former FAA Deputy Administrator, FAA Acting Administrator, Airline Pilot, and United States Air Force Pilot.

³ P.L. 111-216 (August 1, 2010).

⁴ *FAA Final Rule on Pilot Certification and Qualification Requirements for Air Carrier Operations*, 78 Fed. Reg. 42324, 42352 (July 15, 2013); and *Airline Safety and Federal Aviation Extension Act of 2010*, Pub. L. No. 111-216, § 217, 124 Stat. 2348 (2010).

⁵ ICAO, located in Montreal, Canada, is the international body for aviation standards.

Additionally, the regulations do not sufficiently distinguish between flight unsupervised/non-training flight hours and supervised/training flight hours. For most pilots, flight hours usually take place in a small, piston engine aircraft in clear weather, and uncrowded airspace. Supervised training flight hours entail a combination of exceptional curriculum, flight instruction, flight simulation, and relevant practice, practice, practice. Pilots can practice in airplanes, flight training devices, and simulators. Simulator training assures exposure to all-weather events and emergencies that cannot be safely practiced in flight. In contrast, racking up non-training flight hours does little to improve the skills, knowledge, and experience demanded of pilots operating in a multi-engine, multi-crew, busy airline environment.⁶ Unfortunately, because of regulations written decades before the incredible advances in full-motion, high-fidelity simulators, and advanced training devices, pilots are restricted from logging more than about seven percent of their ATP-qualifying time in simulators. As a result, most pilots accumulate over 75 percent of their airline-qualifying flight hours outside of a curriculum and monitored environment. There is an old aviation quote that is particularly fitting: “The pilot who teaches himself [or herself] has a fool for a student.”⁷

Refreshing the regulatory environment with additional structured training programs can ensure more of our future commercial airline pilots receive training in a multicrew environment, learning critical commercial airline concepts like Crew Resource Management and standards of professionalism. An updated training model would also allow flight schools to continuously adapt to new advancements in aircraft technology and training techniques. Experience tells us that an updated model should increase, rather than limit, time spent in modern simulators that expose trainees to emergency scenarios and hostile weather events like icing and thunderstorms—too dangerous to learn or practice in the air. Airlines’ own flight training has also evolved. It is not a coincidence that today’s commercial airline pilots complete nearly all necessary initial or transition flight training in a simulator.

Unfortunately, the U.S. pilot training paradigm is flipped from where it should be. Today’s approach *maximizes* ‘simple flight hours’ but allows *minimal* credit for the use of advanced simulator and ground training devices; we strongly believe it should be the other way around. The FAA can and should continue to evolve alternative qualification pathways to keep pace with continuous improvements in training programs and technology. The U.S. Air Force is doing just that, and their pilot training is rightfully seen as the gold standard.

Advancing the regulatory framework will drive innovation and encourage the development of more quality flight training programs, facilitating greater access to the pilot profession from a broader and more diverse population. This is particularly important when many aspiring pilots cannot afford today’s flight time-centered pathways. Most importantly, our future pilots will be better trained, in a safer training environment with a dramatically smaller carbon footprint.

⁶ Pilot source studies, see: www.pilotsourcestudy.org

⁷ Robert Livingston, *Flying the Aeronca*, 1981.

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We thank you for the opportunity to share our thoughts and recommendations and we stand ready to work with you, the Committee, and all stakeholders to modernize our pilot training regulatory framework and model by incentivizing 'quality flight hours' through FAA-approved structured training programs. Doing so will help address the airline pilot shortage and help to restore air service losses felt by so many communities. Most importantly, it will further enhance the United States' enviable aviation safety record.

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J. Randolph Babbitt

A handwritten signature in blue ink, appearing to read "Dan Elwell". The signature is fluid and cursive, with a large initial "D" and "E".

Dan Elwell