

**STATEMENT OF
CAPTAIN LEE MOAK
PRESIDENT
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

**SUBMITTED TO THE
SUBCOMMITTEE ON AVIATION
COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE
UNITED STATES HOUSE OF REPRESENTATIVES
ON
THE FAA REAUTHORIZATION ACT OF 2011**

February 9, 2011

Mr. Chairman and members of the Subcommittee. I am Captain Lee Moak, president of the Air Line Pilots Association, International (ALPA). ALPA represents 53,000 pilots who fly for 38 passenger and all-cargo airlines in the United States and Canada. On behalf of our members, I want to thank you for the opportunity to provide our perspectives on the FAA reauthorization bill. We applaud the current energy with which Congress is pursuing FAA reauthorization, and we urge you to continue to move this critical legislation forward without delay as it represents vital funding for many aviation programs and enhancements that are important to airline pilots and to the safety of our industry.

We appreciate the opportunity today to highlight several areas of particular interest to ALPA and explain why they are important. We are confident that the legislation will support the continuation and expansion of the robust safety programs that make ours the safest form of transportation in human history, ensure the means to identify and mitigate emerging threats, and avoid relaxing safety standards for any individual segment of the airline industry so that we may provide a single, high level of airline safety.

We will be happy to provide the Committee with our thoughts on any topics related to the bill, and answer any questions the Committee may have.

Pilot Training and Qualifications

Last year, Congress passed and the President signed into law the Airline Safety and Federal Aviation Administration Extension Act of 2010 (P.L. 111-216). This law set a legislative foundation in a number of areas, including the training and certification of pilots, necessary to support the Federal Aviation Administration (FAA) as the federal agency responsible for establishing regulations that affect the safety of our aviation industry. The FAA, as the responsible federal agency, initiated a number of Aviation Rulemaking Committees (ARCs) composed of key industry stakeholders to make recommendations to address these safety issues and propose regulations to improve the level of safety. ALPA believes that this type of industry and government collaboration

works best and we have been very active in these ARCs. Two of the ARCs have completed their work, and several others are presently developing recommendations on critical safety issues. Unfortunately, there are some within our industry who in recent months have expressed opposition to certain pilot training and qualification requirements contained in P.L. 111-216 and the corollary recommendations that the ARCs have subsequently.. We strongly believe, however, that the FAA's pending regulations are needed and that they will ultimately create a significantly higher level of airline safety than presently exists. We urge this Committee to resist any efforts to undo the momentous work done by the FAA and the previous Congress to establish a higher safety bar.

Flight/Duty and Rest Regulations

The current Flight/Duty and Rest Rules do not provide one level of safety. There are different rules for domestic, international, and supplemental, including all-cargo, operations. However, pilot fatigue does not distinguish between types of operations, and the factors that lead to fatigue are common. There is no rational or scientific basis to support different "fatigue rules" depending on the type of operation.

The FAA has issued a notice of proposed rulemaking (NPRM) that would provide one level of safety in the proposed Flight/Duty and Rest Rules—which are based on scientific principles—as required by congressional mandate contained in the Airline Safety and Federal Aviation Administration Extension Act of 2010 (P.L. 111-216). This NPRM is based upon the recommendations of an ARC that was comprised of labor, industry, physicians, and FAA representatives. The ARC, which included air cargo representatives, recommended a single set of rules for all air carrier operations.

In adopting a single rule for all air carrier operations, the FAA recognized that the rules would impact the various air carrier operations differently. Therefore, they provided flexibility to the carriers by providing for Fatigue Risk Management Systems (FRMS). An FRMS allows air carriers, including air cargo operators, to deviate from the prescriptive rules if their alternative method of compliance provides an equivalent level of safety and is scientifically validated. Accordingly, there is simply no reason or need to allow separate rules for supplemental air carriers.

We urge Congress to reject any amendments to the FAA reauthorization bill that would exempt all-cargo air carriers from pending pilot rest regulations.

Protection of Voluntarily Provided Safety Data

As was pointed out in the recently published report of the Future of Aviation Advisory Committee (FAAC), the value of safety data generated by formal data collection efforts cannot be overstated. These valuable sources of data represent, in many cases, the only means of identifying hazards in aviation before they become catastrophic risks, so the collection of these data must be safeguarded. Voluntary, non-punitive safety reporting programs have proven to be an invaluable source of safety information. The most familiar

examples of these programs are the Aviation Safety Action Program (ASAP) and the Flight Operations Quality Assurance program (FOQA). These programs, especially ASAP, rely on a sound foundation of trust among all three parties – the airline, the regulator, and the employee group concerned. The trust on which these programs are based needs to be embodied in a strong guarantee that when issues arise, personalities change, or interpretations are made, parties to the agreement have a fundamental guarantee that their efforts to improve safety will not be met with punishment.

Pilots, controllers, mechanics, and other aviation professionals are on the front lines of daily operations and need to be able to report safety hazards they observe without fear of certificate action by the regulator, discipline by the company, or action in civil litigation. Pilots have a professional interest in identifying and correcting safety deficiencies, and they must not be hindered from doing so. Pilots are also willing to identify and discuss the underlying causes of their own errors so that they and their peers can learn from them, but they need assurance that their forthrightness will not result in punishment. In a very large percentage of cases, information obtained from ASAP reports cannot be obtained any other way. That is, no one but the reporter is aware of the problem identified. Jeopardizing the full, free, and open reporting of safety concerns by these “sole source” reporters would represent an unrecoverable loss of a significant portion of available safety data.

ASAP fosters a voluntary, cooperative, and non-punitive environment—a positive safety culture—for openly reporting safety of flight concerns. Through such reporting, all parties have access to valuable safety information that may not otherwise be obtainable. This information is analyzed to develop corrective actions aimed at solving safety issues and possibly eliminating deviations from federal aviation regulations.

FOQA collects and analyzes large amounts of flight data generated during normal line operations. These data provide great insight into the total flight operations environment and have proven invaluable in identifying trends that may indicate potential hazards. The information and insights provided by FOQA data, particularly when large quantities of such data are combined, can improve safety by significantly enhancing training effectiveness, operational procedures, maintenance and engineering procedures, and air traffic control procedures. While not provided directly by flight crews as a report, these data must nevertheless be protected from misuse for disciplinary or other punitive purposes.

Strong legislation is necessary to guarantee protection from misuse of voluntarily supplied safety information. Programs have been suspended over misuse of reports for purposes of discipline or litigation. When the FAA, an air carrier, and its employees agree on effective corrective action for voluntarily reported problems, the completion of the agreed-upon corrective action should be conclusive, and employees should not be subject to additional disciplinary action. Legislative protections must extend to actions by the regulator, the employer, and civil courts. Failure to provide such protection will undoubtedly result in a significant reduction in the amount and quality of safety data that can be obtained.

Quality safety data from pilots and other aviation workers are essential factors in meeting the requirements for implementation of Safety Management Systems (SMS). SMS is a systematic approach to managing safety and includes the necessary organizational structures, accountabilities, policies, and procedures. The International Civil Aviation Organization (ICAO) established a deadline of January 1, 2009, for States' airlines, airports, and service providers to implement SMS, a deadline that the FAA declared that it could not meet. However, the FAA is working to establish SMS standards and regulatory guidance using the recommendations of an ARC with the goal of eventually complying with the ICAO standard. A properly structured and implemented SMS will provide not only a safer operation for employees and customers, but should also eventually save money through improved efficiencies. The FAA must continue its efforts to develop SMS guidance and training materials to meet the ICAO standard. The FAA must also provide training to its own workforce and safety inspectors to ensure correct implementation and oversight of this new way to manage safety.

The FAAC recommendations also highlighted the value of the safety data noted above as a powerful predictive tool when properly used in robust analysis, simulation, and modeling. The FAA needs the resources to develop and properly use such tools if the true value of safety data is to be realized, and ALPA urges the Congress to provide that support.

National Airspace System Modernization

Another highlight of the FAAC recommendations, one that Congress has long recognized and supported, is the increasingly critical and complex process of modernizing the National Airspace System (NAS). Long-term, stable funding of the nation's airspace and air traffic control infrastructure is essential for safety, capacity, and efficiency gains that are needed to modernize the aviation system. NextGen, the process of accomplishing that modernization, is complicated, expensive, and absolutely must be done right the first time. ALPA believes that funding must be comprised of both federal funds and an equitable funding stream from all airspace users since all users will benefit from this modernization. All users should pay their fair share. Right now, airlines pay the majority of costs for operating the National Airspace System. Reducing the tax burden on our employers would help our industry recover. All users will reap the benefits, and all should bear a fair share of the cost.

There is little debate over the need to modernize. The current U.S. ATC infrastructure is outdated and must be modernized, the equipment's capabilities are limited, and efficiency is decreasing. Delays and other problems in the system that currently plague the ATC system clearly underscore the critical need for ongoing National Airspace System modernization. The entire country will benefit from the airlines' return to economic solvency if capacity and efficiency can be improved. New technologies and procedures can also increase safety, particularly in areas not well served by the current infrastructure. Accelerated development of procedures employing Required Navigation Performance and Area Navigation (RNP/RNAV) methodologies will be key to reaping the benefits of

NextGen and must be supported. These procedures, and the system in which they operate, must be developed with maximum involvement by the front-line employees who will ultimately have to make it all work – pilots and controllers. However, in many cases we are developing ways to put more airplanes in the same amount of space, so any new procedures must be studied, modeled, and thoroughly evaluated to guarantee that the current high level of safety is maintained or improved. Research that supports these efforts, such as continued study of the nature of aircraft wake turbulence, must be supported.

The FAA will realize the first benefits from NAS modernization; however, airspace users may not reap the benefits of installing new aircraft avionics for many years despite the fact that the equipage is necessary to build the foundation for the future. We urge Congress to work with industry to developing an appropriate NextGen airspace management system funding mechanism.

As the aviation community moves from simply planning NextGen to the implementation phases, the means to equip aircraft with the technology necessary to realize the full benefit of NextGen becomes increasingly acute. Initial technological advances such as Automatic Dependent Surveillance-Broadcast, or ADS-B, are key enabling technologies in the progress toward full NextGen implementation; but the early benefits go to the FAA, not to the users. Our industry simply cannot afford to equip thousands of aircraft with expensive avionics and support the maintenance and training requirements that that implies solely on the promise of eventual benefit when the FAA provides the ground- and space-based infrastructure. The economic return on such airline investments will not be realized for several years, even in the best of situations. The value of the nation's air transportation system as an economic engine must be protected by ensuring a means to prevent modernization from being an investment without adequate return while the system matures.

The complexity of NextGen as it matures, and the critical need to ensure that the billions of dollars represented by this effort are spent wisely and efficiently, demands strong leadership and effective oversight. Previous versions of FAA reauthorization bills have, from time to time, included language addressing these critical components of NextGen. Creating an FAA senior management position to ensure effective coordination of all NextGen activity; instituting a government-industry advisory board made up of representatives of line pilots, controllers, and other stakeholders; and defining performance metrics against which modernization efforts can be measured are necessary components of an effective, efficient modernization effort and we urge support for these activities.

Air Carrier Citizenship

ALPA would also like to reaffirm our support for an important element included in H.R. 1586, the reauthorization bill passed in the 111th Congress – the amendment to the air carrier citizenship requirement set forth in Section 801.

It is important for Congress to affirm that U.S. citizens must be in firm control of all the key operational aspects of U.S. air carriers. Section 801 of H.R. 1586 did that by specifically identifying marketing, branding, fleet composition, route selection, pricing and labor relations as some of the operational elements that the Department of Transportation (DOT) must ensure are controlled by U.S. citizens. This affirmation is consistent with the longstanding understanding of the U.S. citizenship requirements of the aviation statutes.

As U.S. airlines seek to enter into ever closer alliance relationships with foreign carriers, there must be clear limits on how far those relationships can go. The latest generation of joint ventures, under which U.S. and foreign carriers share revenues so that they are indifferent as to which airlines or pilots actually fly the aircraft, increases the importance of making sure that decisions that have a direct effect on the number of U.S. employees who will be required for the joint services. It is essential that U.S. carriers not become subordinate components of foreign carrier networks but retain the incentive to develop and take advantage of growth opportunities that will benefit their own employees. This is particularly important at a time when the creation of high-quality jobs for U.S. workers is a leading objective of the national economic and social policy. To that end, we supported H.R. 4788, the Aviation Jobs Outsourcing Prevention Act, in the last Congress and are hopeful that the 112th Congress will make protecting U.S. aviation jobs a priority.

Flight Deck Doors for All-Cargo Aircraft

Following the events of September 11, 2001, Congress mandated that fortified flightdeck doors replace existing barriers on certain commercial aircraft types. Subsequently, the DOT's Rapid Response Team (RRT) identified a need to "...conduct a retrofit of the entire U.S. fleet of aircraft." The reinforced door has since proven to be a valuable enhancement to flightdeck security, and the DOT has determined that all-cargo aircraft are "*equally vulnerable*." The Transportation Security Administration (TSA) has publicly stated that hijacking poses the greatest threat to the all-cargo domain.

In the unique all-cargo environment, many aircraft, including widebody designs, operate with no flightdeck doors at all. Flightdeck doors are not required equipment on newly manufactured cargo aircraft. Flightcrew members of all-cargo aircraft are not supported by cabin attendants or Federal Air Marshals, and are not afforded the possibility of passenger intervention. It is a little-known fact that all-cargo airliners frequently carry additional, non-crew personnel, such as couriers and animal handlers. It is potentially easier for an intruder to gain access to a cargo aircraft due to limited ground security procedures. Terrorists or other persons with malicious intent can readily exploit these vulnerabilities. .

In November 2005, ALPA responded to a DOT/FAA NPRM regarding crewmember monitoring of the area outside the flightdeck door. Language proposed for inclusion in FAR Parts 121.313(k) and 121.582 specifically *excluded* all-cargo operations. As stated at that time, given that the same threat existing for passenger-only operations also exists for aircraft involved in all-cargo operations, ALPA continues to believe that *all* aircraft

operating under FAR Part 121 must be afforded the same standard of safety and security protection. As such, all-cargo aircraft should be equipped with reinforced flightdeck doors or provided an equivalent level of protection. Use of a secondary barrier might well provide needed additional security when used as the only barrier on an all-cargo aircraft.

We were pleased that both the House and Senate versions of the reauthorization bill in the last Congress recognized this security threat and included a study on the feasibility of cockpit doors for all-cargo aircraft. We urge this Committee to retain that important provision.

Laser Hazards

The FAA recently reported a doubling in the number of reported aircraft laser illumination events in 2010 as compared to 2009. The 2,800 events recorded last year each represented an opportunity for lives to be put at risk. We have reviewed the FAA's data and have compared it to our own data and pilot reports. We have concluded that the risk associated with laser illuminations is unacceptable. Pointing lasers at aircraft in flight poses a serious safety risk to the traveling public, and we have called on government and industry to take action to safeguard the skies.

Aiming a laser at an aircraft can create a dangerous situation for pilots, especially when the aircraft is close to the ground during the most critical stages of flight: takeoff and landing. A laser illumination can cause temporary blindness and incapacitation and even permanently damage a pilot's eyes.

Based on the severity of this problem, we recently called for the following immediate responses:

- Congress must make intentionally aiming a laser at an aircraft a federal crime.
- The U.S. government must restrict the sale and use of portable lasers that are strong enough to cause injury.
- The FAA must increase the size of laser-free zones around airports and prohibit the use of all lasers in such zones.
- The FAA must develop and implement improved air traffic control and pilot operating procedures for responding to, notifying pilots about, and re-routing aircraft around threat areas when reports of illuminations are received.
- The National Transportation Safety Board (NTSB) must add deliberate laser illumination of all modes of transportation to its list of Most Wanted Transportation Safety Improvements.

We urge the House of Representatives to swiftly pass the Securing Aircraft Cockpits Against Lasers Act of 2011 (H.R. 386), a bill to protect passengers and crews from the dramatic threat that laser strikes against aircraft pose. We are very pleased that the Senate recently passed such a bill with bipartisan support aimed at mitigating this growing threat to aviation safety.

Further, we urge this Committee to include in the FAA reauthorization a directive to the FAA to develop safety enhancements to mitigate the risks associated with laser illuminations. These safety enhancements should include, but are not limited to, increasing the size of the laser-free zone around airports, developing air traffic control procedures to notify local and federal law enforcement as well as aircraft in the general vicinity when a laser illumination has been reported and route flights away from the reported area where the illumination occurred, and working with other federal agencies to restrict the sale of laser devices that are strong enough to cause injury.

Runway Safety

We urge Congress to continue to promote FAA leadership and industry efforts to mitigate the risks of runway incursions, excursions, and confusion. Congress can greatly facilitate this undertaking by ensuring that appropriate funding is available for a long-term modernization effort targeting those communications, navigation, and surveillance systems that directly impact runway safety.

Many aviation industry partners collaborated with the FAA on ways to improve runway safety following its “Call to Action on Runway Safety” in August 2007. ALPA is doing its part by engaging in activities focused on a heightened awareness of runway and airport safety. For example, we have published a series of runway safety newsletters for our members since January 2008. Additionally, working in conjunction with AOPA, we provided our membership with an interactive runway safety website designed to inform pilots of best practices to increase their vigilance and operational safety during airport surface movements. In fact, we have made runway safety information available to non-ALPA members and the international community.

In spite of the efforts of all industry stakeholders, however, runway safety concerns remain. To its credit, the FAA established a new Runway Safety Council (RSC) and its subgroup the Root Cause Analysis Team (RCAT) in late 2008. The RSC’s mission is to provide government and industry leaders to develop and implement an integrated, data-driven strategy to reduce the number and severity of runway incursions. ALPA applauds the increased focus and attention being paid to runway incursions, and we are optimistic that safety will benefit as a result.

We support legislative provisions that would require the FAA to develop a strategic runway safety plan and implement a runway safety alerting system. In addition to runway incursions, we are also focused on reducing the risk from runway excursions.

ALPA’s white paper on *Runway Incursions*, published in March 2007, proposed that the U.S. government and aviation industry fulfill the commitments that were made to implement the recommendations of the Commercial Aviation Safety Team (CAST) Runway Incursion Joint Safety Implementation Team. CAST determined that 95% of all runway incursions could be prevented with the appropriate mix of technologies; ALPA encourages government and industry action to implement the CAST recommendations.

Unmanned Aircraft Systems (Remotely Piloted Vehicles)

The much-publicized success of Unmanned Aircraft Systems (UAS) in combat operations has created a large potential market for the use of these aircraft by commercial enterprises. Many are also in domestic use by government agencies (e.g., law enforcement, customs, agriculture, etc). As the number of these aircraft increases, and the potential for business use also increases, so does pressure to allow their unrestricted operation in the NAS.

Previously introduced bills have described the depth and breadth of the study needed to evaluate this paradigm shift in the character of the NAS. A plan for integration must include a study of hazards and mitigation methods that must be taken to conclusion—however long that takes. This safety risk analysis is clearly an arena in which accuracy must be given priority over speed. Before UAS can be authorized to occupy the same airspace as airlines, or operate in areas where UAS might inadvertently stray into airspace used by commercial flights, there needs to be in place a standard or combination of standards that will ensure the same high level of safety as is currently present in the NAS. In order to guarantee that high level of safety, extensive study of all potential hazards and ways to mitigate those hazards must be undertaken.

The extreme variation of UAS types – which range in size from as small as a bird to as large as a Boeing 737 – makes this a complex issue. So, too, does the fact that they are flown remotely from operational centers or control stations that may be located at the launch-and-recovery site or thousands of miles away. Some are capable of “autonomous operation,” meaning that they follow preprogrammed instructions without direct operator control. The pilots of UAS are not presently required to hold any FAA license. Most of the current designs were developed for the Department of Defense (DOD) for use in combat areas and so are not necessarily designed, built, maintained, or operated in the same manner as other aircraft in the NAS. As a result, they are typically flown today in segregated airspace, i.e., military restricted airspace or its equivalent.

ALPA believes that a well-trained and well-qualified pilot is the most important safety component of the commercial aviation system. The role of the pilot is a major area of concern within the UAS and piloted aircraft communities. These ground-based pilots should be trained, qualified, and monitored to the same standards as their airborne counterparts. The equipment they fly must be designed, built, and maintained to the same high standards as those operated by other commercial users of the airspace. ALPA will continue to work to protect the safety and integrity of the NAS and ensure that the introduction of UAS operations will not compromise the safety of our members, passengers, cargo, or the public at large.

National Energy Policy and Alternative Fuel Research

There is currently no greater threat to the long-term health of the airline industry than the ongoing potential for large price escalations and scarcity of jet fuel. Jet fuel is the “lifeblood” of the airline industry, and it must be in abundant supply and reasonably priced in order for commercial aviation to survive and thrive.

Despite the airline industry's best efforts to take advantage of every opportunity to increase efficiencies through technology and operational improvements to conserve fuel, jet fuel expenses have become the airlines' largest operating expense and consume as much as 40% of every revenue dollar, up from 15% in 2000. As the result of the exorbitant jet fuel price increases in 2009, many thousands of airline workers, including pilots, were furloughed. The fallout from those increases, in combination with other economic stresses, is still with us even as the price of crude oil has once again risen to more than \$100 a barrel.

U.S. airlines consumed about 430 million barrels of jet fuel in 2008.¹ Although that is a huge amount of fuel, it only represents about 8% of total fuel used by all transportation modes in the country (96% of which is petroleum-based) and only 2% of all fuel of all types used in the U.S.² Other sources of the nation's fuel include natural gas, coal, renewables, and nuclear power. Some industries that currently use petroleum, such as electric power utilities, could convert to coal, nuclear power, or renewable sources, thereby making more petroleum available to the transportation industry, which relies so heavily on oil-based fuel.

Because jet fuel consumption represents a small portion of the country's total energy needs, it is impossible to significantly increase its supply, and thereby decrease its price, in the foreseeable future without (1) increasing oil production (whether domestically, abroad, or both), (2) decreasing the amounts of oil used by non-aviation entities by their switching to alternative energy source(s) in order to make more of it available to aviation, or (3) both.

ALPA was at the center of industry activity that began in early 2008 to urge Congress to reform oil commodities trading practices to reduce the effects of rampant speculation. Regardless of what may happen to the price of oil in the near future as a result of speculation reform or other short-term legislative remedies, the reality is that the U.S. does not have a comprehensive national energy policy. Without the creation and implementation of a national energy policy that will increase the supply and decrease the price of jet fuel, the future of U.S. airlines will continue to be precarious. At present, pilots can merely hope that jet fuel will be so priced that their carriers can remain in business.

ALPA urges Congress to adopt a national energy policy that will include the goals of making jet fuel available and affordable into the future. Such a policy should include the following principles:

1. Regulate oil commodities trading to eliminate loopholes, increase transparency, and reduce the potential for rampant investor speculation that may lead to artificially higher prices;
2. Prohibit any new taxes, charges, or fees on fuel used by airline operations;

¹ Source: Air Transport Association

² Source: U.S. Department of Energy

3. Encourage the development of new technologies and operational concepts that reduce transportation energy consumption and minimize environmental impacts;
4. Increase domestic production of energy sources focusing on clean energy and environmentally responsible oil production;
5. Promote greater use of non-oil-based energy sources within the aviation industry and transportation modes that can use alternative types of energy; and
6. Provide government-funded research and development of a low-cost, renewable, low- or non-emitting alternative fuel(s) for use by commercial aviation and other transportation modes.

Wildlife Hazards

The hazard of bird strikes to aircraft has been dramatically demonstrated in recent years, but it is a risk that is far from new; the Wright brothers recorded the first bird strike in 1905. The first bird strike-related fatality occurred in 1912 when aviation pioneer Cal Rodgers collided with a gull that became jammed in his aircraft's controls and caused it to crash. Striking large birds at high speeds may result in catastrophic damage to an engine, airframe, or pilot's windshield. Even a "small" bird of 4 pounds struck by an aircraft traveling 250 knots (288 mph) delivers the force of approximately 38,000 pounds at the point of impact.³

It is impossible to completely prevent birds from being struck by aircraft, so efforts have focused for many years on reducing the possibility of a strike and the severity of the consequences. Airframe and engine manufacturers have made great strides in designing aircraft structures, including windshields and engines, that are able to withstand the force that results from striking and ingesting most birds. Engine design standards were updated in 2004 to require that engines be capable of ingesting up to an 8-pound bird depending on the engine's inlet size. Engines must also demonstrate the ability to withstand some level of damage and continue to operate. Windshields and windows must be tested to withstand a 4-pound bird strike. In 2007, new requirements addressed flocking birds and bird weight variability. ALPA was part of the team developing these standards. Obviously, however, aircraft cannot be made impervious to the effects of bird strikes, especially when all engines are impacted. Control of the wildlife population is also a critical part of the solution. The FAA requires commercial service airports to conduct wildlife hazard assessments and implement a wildlife hazard management plan, if warranted. Airport operators scare birds and wildlife away from aircraft operating areas using such measures as air guns, lasers, and wildlife patrols, and they use fencing and extermination to reduce the threat posed by large mammals such as deer.

We have testified about wildlife hazards before this Subcommittee in the past, and our concerns remain the same. The hazard remains real and difficult to mitigate, and we would therefore urge Congress to ensure that sufficient funds are available for wildlife hazard mitigation research.

³ Source: Transport Canada

Airport Rescue and Firefighting

ALPA has long been concerned about the lack of a requirement to provide firefighting services at airports. The legislation under consideration today represents an excellent opportunity to correct a critical safety deficiency that exists at a number of airports that airline aircraft serve. Current law and FAA regulations allow airports serving airlines involved in all-cargo operations to reduce, and in some cases even eliminate, firefighting capability on the airport while those all-cargo flights are operating. This means that the crews, other occupants, and the contents of these all-cargo aircraft are at a considerably increased risk in the event of an onboard fire. We urge the Congress to ensure that the review of airport firefighting standards includes a requirement to correct this discrepancy and provide the same level of safety for cargo operations as is enjoyed by passenger airlines.

Pacific Island Airfields

Funding for the continued operation of Wake Island and Midway Island airfields is important to both the financial health of our industry and the safe operation of transpacific flights. Long, over-water commercial flights are always conducted using routes that allow diversion to a suitable landing area in the event of an engine failure or similar emergency. Without these airports available as alternates in the event of an in-flight emergency, transpacific flights will be required to use longer, less efficient routes. We urge the Subcommittee to ensure support for sustaining the operation of these and other such airfields by including appropriate funding for their continued operation in the FAA reauthorization legislation.

Aviation Research

As we move to modernize the nation's air transportation system, many of the emerging procedures for capacity enhancement must be supported by sound research efforts to ensure that the U.S.'s enviable level of safety is maintained. As more and more precise navigation capability allows us to put aircraft closer together, we must nevertheless be mindful of the fact that there is much to be learned about the nature of wake vortices and the effect of wake turbulence both in the terminal and en route realms of operations.

We are encouraged by the level of support shown by Congress in the past in identifying the need for research into wake turbulence effects as well as the impact on operations of weather such as icing. We all remember the dramatic impact of airborne volcanic ash on global airline operations in 2009. We were pleased to be invited to share our concerns before the House Subcommittee on Science and Technology last May. While it is fortunate that no lives were lost in the aftermath of the volcanic eruption in Iceland, the impact had devastating consequences on the global business of aviation. We urge this Subcommittee to include in the FAA reauthorization language support for research on the impact of volcanic ash on operations, and on means to effectively identify and avoid the multiple hazards associated with ash as well. In addition, phenomena under study in these

efforts must not only be studied to determine their operational impact, but methods must also be developed to describe the location and effects of such phenomena. This information must be relayed in terms that are operationally relevant and can be transmitted to flight crews and dispatchers in a timely manner to support improved safety decision-making.

Human Intervention and Motivation Study (HIMS) Program

The Human Intervention and Motivation Study is a vital program that helps flightcrew members operate in as safe a manner as possible. HIMS is a prototype alcohol and drug assistance program, developed specifically for commercial pilots, that coordinates the identification, assessment, treatment, and medical recertification of flight officers in need of such help. It is an industrywide effort in which companies, pilot unions, and the FAA work together to preserve careers and further air safety. It has been an extremely successful program since its inception in 1974, and we are pleased that Section 812 was included in H.R. 1586 last year. It was funded in the FY2010 Transportation Appropriations bill to continue its mission through FY2012.

Finally, I want to express ALPA's appreciation for this Committee's commitment to moving a reauthorization bill expeditiously. As we must all acknowledge, passing a long-term, comprehensive bill to reauthorize the activities of the FAA, to upgrade airports and modernize the NAS, and to improve aviation safety is critical not only to pilots and the aviation industry but also to the entire nation and our national economy. Thank you again for the opportunity to offer ALPA's perspective on these critical issues.

#