Congress of the United States
Washington, DC 20515

April 27, 2012

The Honorable Ray LaHood
Secretary of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Michael P. Huerta
Acting Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Secretary LaHood and Administrator Huerta,

We write you today reflecting our continued commitment to achieving one true level of safety between all major and regional carriers. Our constituents have personally and tragically experienced immense loss as a result of the failure of this goal to have been achieved – namely, the fatal crash of Continental Flight 3407 in Clarence Center, New York on February 12, 2009. Along with the courageous Families of Continental Flight 3407, we have fought for the thorough implementation of robust airline safety provisions in the reauthorization of the Federal Aviation Administration, which were signed into law on August 1, 2010. Our correspondence today relates to your Agency's implementation of Section 216 and 217 of that law, addressing flight crewmember screening and qualifications as well as airline transport pilot (ATP) certifications.

In the current state of commercial aviation today, there exists a significant gap in the hiring standards for first officers between the major and regional carriers. Consequently, the importance of the proper execution of these regulations toward the goal of achieving one level of safety cannot be overstated, both on qualitative and quantitative measures. We have seen in the past that when flight crews have not received adequate training, the propensity for a fatal error to occur increases. That is why we support the full implementation of Section 217(c)(1), that requires flight pilots to have at least 1,500 substantive flight training hours to receive an ATP certification. As you promulgate these regulations, we ask you to use your statutory discretion to hold to that standard steadfastly.

Fulfilling the intent of the 1,500 flight hour requirement must be taken very seriously, and we believe pilots should fulfill this requirement through actual flight hours before attaining eligibility for an ATP certification. This requirement is well-founded – under previous law, pilots only needed a Commercial Pilot license, requiring a minimum of 250 flight hours before being hired by a commercial airline. Along with the proposed Certification Training Program that the FAA has already proposed to improve the quality of training received and the diversity of training trainees receive, the 1,500 flight hour requirement will serve to enhance that training by increasing exposure to real-world difficult operating conditions.

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We acknowledge the special training of military pilots and understand the justification for a special dispensation given the highly specialized and disciplined screening and training procedures those pilots undergo. Other than the specialized military training, we express concern about any proposal to abridge the 1,500 flight hour requirement. Unless that alternative can certifiably be considered as an actual equivalent to the hours received in pilot training, such an alternative should be avoided to preserve the safety standards intended by the law.

We are heartened by the progress that your agency has made in effectuating the intent of the legislation that we, fighting alongside the Families of Continental Flight 3407, have long sought. We urge you to continue this fight by upholding the intent of these provisions fully.

Sincerely,

BRIAN HIGGINS
Member of Congress

LOUISE M. SLAUGHTER
Member of Congress

TOM REED
Member of Congress

KATHLEEN HOCHUL
Member of Congress