
Office of the Inspector General

Audit Report

*Training and Proficiency Testing for
Commuter and Air Taxi Pilots*

Federal Aviation Administration

Report Number: R5-FA-7-001

Date Issued: October 21, 1996





**U.S. Department of
Transportation**

Office of the Secretary
of Transportation

Office of the Inspector General

Memorandum

INFORMATION: Report on Training and Proficiency Testing for
Commuter and Air Taxi Pilots, FAA, Report No. R5-FA-7-001

October 21, 1996
JA-1

Lawrence H. Weintrob
Assistant Inspector General for Auditing

Federal Aviation Administrator

I am providing this report for your information and use. We concluded that FAA's oversight procedures and controls for monitoring commuter and air taxi pilot compliance with certification, training, and proficiency testing regulatory requirements were generally effective. A synopsis of the report follows this memorandum.

This report does not include recommendations. Therefore, no action is required under Department of Transportation Order 8000.1C.

I appreciate the cooperation and assistance extended to the audit team by you and your staff. If you have any questions or require additional information concerning this report, please call me on (202) 366-1992 or Ronald H. Hoogenboom, Regional Manager, on (312) 353-0104.

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U.S. Department of
Transportation

Office of the Inspector General

Training and Proficiency Testing for Commuter and Air Taxi Pilots

Federal Aviation Administration

Report Number: R5-FA-7-001

October 21, 1996

Objective

The objective of this audit was to determine whether the Federal Aviation Administration (FAA) has established procedures and oversight controls to assure that commuter and air taxi pilots, engaged in passenger-carrying operations, hold valid pilot certificates and have periodic training and proficiency tests.

Conclusion

FAA's oversight procedures and controls for monitoring commuter and air taxi pilot compliance with pilot certification, training, and proficiency testing requirements were generally effective.

Monetary Impact

This report does not have a monetary impact.

Recommendation

We did not make any recommendations.

Management Position

Since we did not make any recommendations, management is not required to respond to the report under Department of Transportation Order 8000.1C.

Office of Inspector General Comments

Office of Inspector General comments are not provided since management's position was not obtained.

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TABLE OF CONTENTS

TRANSMITTAL MEMORANDUM

SYNOPSIS

I. INTRODUCTION

Background.....1

Objective, Scope, and Methodology.....1

Management Controls.....3

Prior Audit Coverage.....3

II. RESULTS OF AUDIT

Certificates.....4

Training.....4

Proficiency Checks.....4

III. EXHIBITS

Exhibit A: Statistical Methodology Plan.....5

Exhibit B: FAA District Offices And Airlines Sampled.....6

Exhibit C: Major Contributors to this Report.....10

I. INTRODUCTION

Background

Under the Federal Aviation Act of 1958, the Federal Aviation Administration (FAA) is responsible for establishing pilot certification, training, and proficiency requirements and for conducting periodic surveillance inspections to ensure compliance with regulations. Requirements relating to commuter and air taxi pilots are contained in Federal Aviation Regulation (FAR) Part 135 and are less restrictive than those for commercial airlines operating larger aircraft under FAR Part 121. To operate aircraft under FAR Part 135, a pilot must (i) obtain either a commercial or airline transport pilot certificate, (ii) be type rated for the aircraft to be operated, and (iii) obtain a medical certificate. Further, commuter and air taxi pilots must receive all prescribed training in the airline's FAA approved training plan and pass required periodic ground and air proficiency checks given by either FAA inspectors or specifically designated check airmen. FAA's Flight Standards Division is responsible for enforcement of pilot certification requirements. In addition, FAA inspectors monitor compliance with training, proficiency, and airline record keeping requirements.

Commuter and air taxis operating under FAR Part 135 use aircraft with a maximum seating capacity of 30 passengers or a maximum payload of 7,500 pounds. This category specifically excludes agricultural aircraft, and external load rotor craft. Operators, often referred to as regional commuters, with an aircraft seating capacity greater than 30 passengers, were not included in this audit since they operate under FAR Part 121.

Subsequent to initiation of this audit, FAA issued a Notice of Proposed Rule Making (NPRM) requiring commuter airlines, operating aircraft with 10 or more seats, comply with the more restrictive FAR Part 121. The final rule was issued in January 1996, and FAA estimated it will affect approximately 75 FAR Part 135 commuter airlines.

Objective, Scope, and Methodology

The objective of this audit was to determine whether FAA has established procedures and oversight controls to assure that commuter and air taxi pilots, engaged in passenger-carrying operations, hold valid pilot certificates and have periodic training and proficiency tests.

Our audit covered FAA oversight of commuter and air taxi pilot certification, training, and proficiency testing requirements during Fiscal Years (FY) 1994, 1995, and the first quarter of 1996. Audit work was performed at FAA Headquarters and at Flight Standards District Offices (FSDO) and commuter and air taxi operators located throughout the U.S. and Puerto Rico. (see Exhibit B.) The audit was conducted in accordance with the Government Auditing Standards prescribed by the Comptroller General of the United States, and was conducted between December 1994 and December 1995.

We interviewed FAA Flight Standards Division and airline personnel responsible for oversight and compliance with applicable regulations. In addition, we evaluated FAA's oversight policies and procedures, reviewed FAA inspection and enforcement summary reports, and employed statistical sampling techniques to review records maintained by FSDOs and carriers.

To test compliance with applicable regulations, we selected a statistical sample of 300 of the 19,039 commuter and air taxi pilots included in FAA's data base as of May 30, 1995. The sample and universe for purposes of testing compliance with training and proficiency requirements was reduced to 298 and 19,037 respectively because of missing records for two pilots. This sampling adjustment had no material effect on projections or audit conclusions. Our sample included ten of the 78 FSDOs and 143 out of a total 3,101 commuter and air taxi carriers. A summary of the sampling methodologies is included as Exhibit A. For each of the pilots selected, we:

- verified that medical and pilot certificates were current.
- determined whether each pilot had received required initial, upgrade, transitional or recurrent training during the last twelve months, and determined whether training was in accordance with a FAA approved training program curriculum, required for all airlines except exempt one pilot operations.
- determined whether each pilot received ground and in-flight proficiency checks required during the last twelve months. The required proficiency checks are included in FAR Part 135.293, "Initial and recurrent pilot testing requirements," FAR Part 135.297, "Pilot in command: Instrument proficiency check requirements," and FAR Part 135.299, "Pilot in command: Line checks: Routes and airports."
- verified that each proficiency check was performed by FAA or a FAA approved check airman.

Management Controls

We evaluated the following FAA management controls for ensuring that commuter and air taxi pilots comply with applicable FAR Part 135 regulations covering certification, training, and proficiency testing requirements:

- A FAA inspector or an approved Designated Examiner issues each commuter and air taxi pilot a commercial or transport pilot certificate upon meeting experience and testing requirements. A current medical certificate is also required to operate an aircraft in commuter or air taxi service. As part of a line check/en-route inspection, FAA inspectors verify that each pilot has the required airmen and a current medical certificate in their possession. Further, FAA maintains a national registry of pilot airmen and medical certificates.
- A training program for each commuter or air taxi airline, except one pilot operators, must be approved by the FAA Certificate Holding District Office (CHDO). FAA inspectors monitor the implementation of the training program and perform periodic records checks to ensure each pilot has met the training requirements.
- Required pilot proficiency checks are either conducted by a FAA inspector or an FAA approved check airmen. Copies of pilot proficiency checks are maintained by each operator and are periodically reviewed by FAA inspectors during records checks. Check rides for all check airmen are performed by FAA inspectors.

Prior Audit Coverage

There have been no prior General Accounting Office (GAO) or Office of Inspector General (OIG) audits of FAA's oversight of commuter and air taxi pilot compliance with certification, training, and proficiency testing requirements.

II. RESULTS OF AUDIT

FAA's oversight procedures and controls for monitoring commuter and air taxi pilot compliance with pilot certification, training, and proficiency testing requirements were generally effective. The results of our tests of FAA's implementation of these oversight procedures and controls relating to our audit objective, are discussed in the following paragraphs.

Certificates

Each of the 300 pilots statistically selected had a valid pilot and a current medical certificate. Also, each pilot's airmen and medical certificate data agreed with FAA's computerized registry databases. We concluded that FAA's procedures and controls for monitoring compliance with commuter and air taxi pilot certificate requirements were generally effective.

Training

We found that 272 of the 298 pilots statistically selected had received required training in accordance with a FAA approved training program. The remaining 26 pilots were exempt from training requirements under the regulations because they were either one pilot operations or one pilot-in-command operations. We concluded that FAA's procedures and controls for monitoring compliance with pilot training requirements were generally effective.

Proficiency Checks

We found that 294 of the 298 pilots statistically selected received required proficiency checks within prescribed time frames. The remaining four pilots were single pilot operators not required to have proficiency checks because they had not conducted operations under FAR Part 135 since the expiration of the maximum time period between proficiency checks. FAA considers the certificates for these single pilot operators to be dormant and has recently issued new requirements before pilots with dormant certificates can resume passenger carrying operations. We concluded that FAA's procedures and controls for monitoring compliance with pilot proficiency check requirements were generally effective.

STATISTICAL METHODOLOGY PLAN
Prepared By: Petra Rose, OIG Statistician

Background on Selection

Statistical projections of the percentage and number of pilots who (1) did not have the required pilot certificate, (2) did not have a current medical certificate, (3) had no initial or recurrent training, and (4) had missed a proficiency check, were required in support of the objectives of this audit.

The Sampling Plan

A universe listing with 78 certificate holding FSDOs was obtained from FAA Flight Standards Liaison as of May 31, 1995. A multi-stage sample with FSDOs as the primary sampling unit and pilots as the secondary was deemed appropriate. A sample size of 10 FSDOs and then 30 pilots within them was agreed upon to enable projections at the 90 percent confidence level. Selections were made with the Defense Contract Audit Agency's EZQ software's random number generator. Projections were made using the Poisson distribution probabilities.

Results

Training and proficiency records for two pilots could not be located, requiring the universe of 19,039 pilots and 300 sample size to be reduced to 19,037 and 298 pilots respectively. Our review disclosed no discrepancies with respect to the attributes tested and results in the following estimates with 90 percent confidence:

- No more than 146 or 0.8 percent of the 19,039 pilots had invalid pilot or non current medical certificates.
- No more than 147 or 0.8 percent of the 19,037 pilots had not received required initial or recurrent training or missed proficiency checks.

The source and methodology used in analyzing this sample is Statistical Auditing by Andrew D. Bailey, Jr., Harcourt Brace Jovanovich, Inc.

FAA DISTRICT OFFICES AND AIRLINES SAMPLED

| Item | FAA District Office | Airline | Number of Pilots Sampled |
|------|---------------------|-------------------------------------|--------------------------|
| 1. | GL13 | Air Cargo Carriers, Inc. | 2 |
| 2. | GL13 | Astral Aviation, Inc. | 10 |
| 3. | GL13 | Contemporary Products, Inc. | 1 |
| 4. | GL13 | Eagle Harbor Air Service, Inc. | 1 |
| 5. | GL13 | Gran Aire, Inc. | 3 |
| 6. | GL13 | Heartland Aviation, Inc. | 2 |
| 7. | GL13 | Magnus Aviation, Inc. | 1 |
| 8. | GL13 | Morey Airplane Co., Inc. | 1 |
| 9. | GL13 | Rhineland Flying Service, Inc. | 1 |
| 10. | GL13 | Scott Aviation, Inc. | 2 |
| 11. | GL13 | T D M, Inc. | 2 |
| 12. | GL13 | Waukesha Flying Services, Inc. | 1 |
| 13. | GL13 | West Bend Air, Inc. | 2 |
| 14. | GL13 | Wisconsin Aviation, Inc. | 1 |
| 15. | NE03 | Aircraft Charter Group, Inc. | 2 |
| 16. | NE03 | Associated Aircraft Group, Inc. | 2 |
| 17. | NE03 | Capital Airlines, Inc. | 1 |
| 18. | NE03 | City Aviation, Inc. | 1 |
| 19. | NE03 | Condor Express Corp. | 2 |
| 20. | NE03 | Fitchburg Colonial Aviation, Inc. | 1 |
| 21. | NE03 | Flight Services Group, Inc. | 3 |
| 22. | NE03 | Interstate Aviation, Inc. | 1 |
| 23. | NE03 | Jet Charter, Inc. | 1 |
| 24. | NE03 | K A T, Inc. | 1 |
| 25. | NE03 | K Services, Inc. | 1 |
| 26. | NE03 | Key Air, Inc. | 2 |
| 27. | NE03 | Lyon Aviation, Inc. | 1 |
| 28. | NE03 | Reliant Air Charter, Inc. | 2 |
| 29. | NE03 | Robinson Aviation, Inc. | 1 |
| 30. | NE03 | Shoreline Aviation, Inc. | 2 |
| 31. | NE03 | Summit Jet Corp. | 3 |
| 32. | NE03 | Wico Aviation, Inc. | 1 |
| 33. | NE03 | Windham Aviation, Inc. | 2 |
| 34. | NM03 | Air Methods Corp. | 9 |
| 35. | NM03 | Arrow Aviation, Inc. | 2 |
| 36. | NM03 | Aspen Base Operation, Inc. | 1 |
| 37. | NM03 | Casper Air Service, Inc. | 2 |
| 38. | NM03 | Colorado Aircraft Specialists, Inc. | 1 |

| Item | FAA District Office | Airline | Number of Pilots Sampled |
|------|---------------------|-----------------------------------|--------------------------|
| 39. | NM03 | Geo-Seis Helicopters, Inc. | 2 |
| 40. | NM03 | Hawkins And Powers Aviation, Inc. | 1 |

Exhibit B

| | | | |
|-----|------|--|----|
| 41. | NM03 | Heliwest Helicopter Corp. | 1 |
| 42. | NM03 | HPH Aviation, Inc. | 1 |
| 43. | NM03 | Mayo Aviation, Inc. | 2 |
| 44. | NM03 | Milam International, Inc. | 2 |
| 45. | NM03 | Northern Colorado Air Charter, Inc. | 2 |
| 46. | NM03 | Proflight, Inc. | 2 |
| 47. | NM03 | Sky Harbor Air Service, Inc. | 2 |
| 48. | SO07 | Apollo Aviation Co, Inc. | 5 |
| 49. | SO07 | AV Charter Of Mississippi, Inc. | 6 |
| 50. | SO07 | Delta Aero, Inc. | 1 |
| 51. | SO07 | Fuel Services, Inc. | 3 |
| 52. | SO07 | Hodges Aviation, Inc. | 1 |
| 53. | SO07 | Jim Hankins Air Service, Inc. | 8 |
| 54. | SO07 | Nygren Air Service, Inc. | 1 |
| 55. | SO07 | RAS, Inc. | 1 |
| 56. | SO07 | Southeast Mississippi Air Ambulance | 3 |
| 57. | SO07 | Southern Airlink | 1 |
| 58. | SO19 | Airways International, Inc. | 2 |
| 59. | SO19 | Biscayne Helicopters, Inc. | 1 |
| 60. | SO19 | Collier County Helicopter Oper. | 1 |
| 61. | SO19 | Express Airways, Inc. | 1 |
| 62. | SO19 | Gulfstream International Airlines Inc. | 16 |
| 63. | SO19 | Intermed Services, Inc. | 3 |
| 64. | SO19 | James Wyatt Enterprises, Inc. | 1 |
| 65. | SO19 | Joe Husta Aircraft Corp. | 1 |
| 66. | SO19 | Keywest Seaplane Service, Inc. | 1 |
| 67. | SO19 | Miami City Flight | 1 |
| 68. | SO19 | Sonic Air Systems, Inc. | 2 |
| 69. | SO21 | Air Cargo Now | 1 |
| 70. | SO21 | Air Center Helicopters, Inc. | 1 |
| 71. | SO21 | Bohlke International Airways, Inc. | 1 |
| 72. | SO21 | Caribbean International Airlines, Inc. | 1 |
| 73. | SO21 | Corporate Air Charter, Inc. | 1 |
| 74. | SO21 | Daystar Airways, Ltd. | 1 |
| 75. | SO21 | Diaz Aviation Corp. | 1 |
| 76. | SO21 | Flamenco Airways, Inc. | 3 |
| 77. | SO21 | Four Star Aviation, Inc. | 2 |
| 78. | SO21 | Isla Nena Air Service, Inc. | 2 |
| 79. | SO21 | Kingfisher Air Services Air Safari | 1 |

| Item | FAA District Office | Airline | Number of Pilots Sampled |
|------|---------------------|------------------------------------|--------------------------|
| 80. | SO21 | M And N Aviation | 1 |
| 81. | SO21 | MBD Corp. | 2 |
| 82. | SO21 | Pringle, Bernadette | 1 |
| 83. | SO21 | Provimentos, Inc. | 1 |
| 84. | SO21 | Puerto Rico Aviation Company, Inc. | 2 |
| 85. | SO21 | Tol Air Services, Inc. | 2 |
| 86. | SO21 | Two Aviators, Inc. | 1 |

Exhibit B

| | | | |
|------|------|--|----|
| 87. | SO21 | Tyden Air, Inc. | 1 |
| 88. | SO21 | Vieques Air Link, Inc. | 4 |
| 89. | SO25 | Air Path, Inc. | 4 |
| 90. | SO25 | American Health Aviation, Inc. | 1 |
| 91. | SO25 | Battles, Richard | 1 |
| 92. | SO25 | Easterling, Ellis R. III And Melodi J. | 1 |
| 93. | SO25 | Fair Planes, Inc. | 1 |
| 94. | SO25 | Gilding, Bernard | 1 |
| 95. | SO25 | Global Air Services, Inc. | 1 |
| 96. | SO25 | Graves And Graves Construction Company, Inc. | 1 |
| 97. | SO25 | Mem Med Ctr Air Ambulance Serv Inc | 9 |
| 98. | SO25 | Myles, Raymond A. | 1 |
| 99. | SO25 | Raw, Inc. | 1 |
| 100. | SO25 | Richards Aviation, Inc. | 2 |
| 101. | SO25 | Shelby Aviation, Inc. | 1 |
| 102. | SO25 | Trans. Aero Corp. | 5 |
| 103. | SW03 | Charlie Hammonds Flying Service Inc | 1 |
| 104. | SW03 | Chevron USA Production Company | 4 |
| 105. | SW03 | Mobil Administrative Services Company, Inc. | 1 |
| 106. | SW03 | Offshore Logistics, Inc. | 5 |
| 107. | SW03 | Petroleum Helicopters, Inc. | 18 |
| 108. | SW03 | Priority Air, Inc. | 1 |
| 109. | WP07 | Arizona Executive Air, Inc. | 1 |
| 110. | WP07 | Bingham Leasing Company L C | 1 |
| 111. | WP07 | Copper State Air Service, Inc. | 1 |
| 112. | WP07 | Cutter Aviation, Inc. | 1 |
| 113. | WP07 | Delta Leasing, Inc. | 1 |
| 114. | WP07 | Northern Arizona Healthcare | 2 |
| 115. | WP07 | Ponderosa Aviation, Inc. | 2 |
| 116. | WP07 | Safford Aviation Service, Inc. | 1 |
| 117. | WP07 | Sawyer Aviation, Inc. | 1 |
| 118. | WP07 | Scenic Airlines, Inc. | 8 |
| 119. | WP07 | Shamrock Foods Company | 1 |

| Item | FAA District Office | Airline | Number of Pilots Sampled |
|------|---------------------|---|--------------------------|
| 120. | WP07 | Southwest Executive Charters, Inc. | 2 |
| 121. | WP07 | Southwest Helicopters, Inc. | 3 |
| 122. | WP07 | Superstition Air Service, Inc. | 2 |
| 123. | WP07 | Tucson Commander, Inc. | 1 |
| 124. | WP07 | Tyconic, Inc. | 1 |
| 125. | WP07 | Westwind Aviation, Inc. | 1 |
| 126. | WP11 | American Medflight, Inc. | 2 |
| 127. | WP11 | Clough, Richard D., D.b.a. Proughorn Aviation | 1 |
| 128. | WP11 | Coffelt, John X. | 1 |
| 129. | WP11 | D And D Corporate Air Charter | 1 |
| 130. | WP11 | El Aero Services, Inc. | 2 |
| 131. | WP11 | Elliott Aviation, Inc. | 1 |
| 132. | WP11 | English, Daniel B. | 1 |

Exhibit B

| | | | | |
|------|--------|---------------------------------------|---|-----|
| 133. | WP11 | Evans, Tommie W. | 1 | |
| 134. | WP11 | Fallon Airmotive | 1 | |
| 135. | WP11 | Fehrman, John S. | 1 | |
| 136. | WP11 | Hangar One Aero Service, Inc. | 2 | |
| 137. | WP11 | Heaverne, Clifford J. | 1 | |
| 138. | WP11 | Hutt Aviation, Inc. | 1 | |
| 139. | WP11 | Medic Air, Inc. | 3 | |
| 140. | WP11 | Reger, David R. | 1 | |
| 141. | WP11 | Reno Flying Service, Inc. | 8 | |
| 142. | WP11 | Sierra Aviation, Inc. | 1 | |
| 143. | WP11 | Skydance Operations, Inc. | 1 | |
| | Total: | Pilots Included In Statistical Sample | <table border="1"><tr><td>300</td></tr></table> | 300 |
| 300 | | | | |

MAJOR CONTRIBUTORS TO THIS REPORT

The following is a list of major contributors to this report.

| | |
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| Richard Noll | Project Manager |
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