CHIRP
Air Transport FEEDBACK

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EDITORIAL

<u>Fatigue.</u> Tiredness and fatigue are regularly reported to CHIRP and there is another example in this edition of FEEDBACK. Fatigue, which can affect anyone no matter whether they work in the air or on the ground, is defined as follows:

> *"Fatigue" means a physiological state of reduced mental or physical performance capability resulting from sleep loss or extended wakefulness, circadian phase, or workload (mental and/or physical activity) that can impair a crew member's alertness and ability to safely operate an aircraft or perform safety related duties [as defined by ICAO in the FRMS Manual Doc 9966].*

CHIRP has long promoted the importance of conscientious fatigue reporting. For commercial flight crew this has become even more important with the adoption of EASA FTLs in order to capture and assess the effects of the new regulations. Operators seeking to utilise fully the new regulations should ensure that FDPs differing significantly from those permissible under CAP371 are assessed for likely fatigue effects <u>before</u> they are rostered. Flight crew have a responsibility to ensure the factors within their control (e.g. lifestyle, fitness and behaviour) are compatible with their duties and to report fatigue whenever it occurs. Chronic fatigue should also be reported to AMEs since there may be underlying medical issues. Another benefit of doing so is that, although there are many AMEs and each one may see only a few cases of fatigue, collectively they comprise an influential and credible source of disidentified data for assessing the impact of the new FTLs.

<u>Do you speak EASA?</u> Are you on your AMC or your AltMoC? Here is a brief guide to what is meant. In the EASA system, three main levels of Regulatory material exist:

- The Basic Regulation itself, adopted by the European Parliament and the Council, binding in all its elements.

- [Implementing Rules to the Basic Regulation](#), adopted by the European Commission; and
- Certification Specifications (CS), Acceptable Means of Compliance (AMC) and Guidance Material (GM) adopted by the Agency.

Acceptable Means of Compliance (AMC)

AMCs are non-binding standards adopted by EASA to illustrate means to establish compliance with the Basic Regulation and its Implementing Rules.

Alternative Means of Compliance (AltMoC)

Since AMCs are non-binding, regulated persons may choose alternative means to comply with the rule. In this case, however, they lose the presumption of compliance provided by the EASA AMC, and need to demonstrate to competent authorities that they do comply with the law. Implementing Rules establish that the implementation of AltMoC by organisations is subject to prior approval by the competent authority (in the UK - the CAA) and indicate what needs to be done in order to obtain the approval.

Why is this important? Although National Aviation Authorities (NAAs) must notify EASA that an AltMoC has been approved, and EASA publishes a list of approved AltMoC references, EASA does not publish the detail of what they contain. This makes it difficult for CHIRP to determine how operators are complying with the Regulations and Rules. The good news is that operators will be required to publish how they comply in their relevant manuals. Worth bearing in mind e.g. when comparing procedures and practices in company manuals with the EASA regulations and AMC.

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Ian Dugmore - Chief Executive

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ENGINEERING INTRODUCTION

The first few months of my new role have passed very quickly with a number of Engineering reports being submitted covering a range of airworthiness issues, a number of which have been resolved. I would like to thank all those who have contributed to the solutions and for the support I have received across the broad range of topics reported.

In 2016 we plan to roll-out CHIRP to the Ground Handling Community, an industry area that, since November 2015, is covered by the EASA Occurrence Reporting Regulations. I look forward to your support in this, and the ongoing Engineering activity, in 2016.

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Dave Tattersall – Deputy Director (Engineering)

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B777 CABIN FIRE 4TH FEBRUARY 2015 – EMERGENCY DIVERSION INTO LONDON GATWICK

Report Text: As Captain of the above flight, I would like to express my sincere thanks and gratitude through CHIRP for the excellent help and service received from all the ATCOs and the Gatwick Fire service involved in this incident.

From the report to us by cabin crew of dense smoke in the rear cabin at 35,000ft approaching position BENBO, to landing at Gatwick was only 20 minutes (and 10 seconds). With the Swissair MD11 accident at Halifax in mind, this was a very good result indeed and only possible through the professionalism of the London FIR ATCOs.

It was later discovered that the fire was started by an overheating laptop nickel cadmium battery being over- charged in the passenger cabin.

CHIRP Comment: It is a pleasure to print this report and to congratulate all those who contributed in an exemplary manner to the safe resolution of this in-flight emergency. Concerns over in-flight fires, particularly those associated with the carriage of Lithium batteries, continue in the industry and you may wish to remind yourself of the advice contained in AIC 83/2005 (Pink 86) titled The Need To Avoid Delay When An Immediate Landing Appears Necessary.

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USE OF MOBILE TELEPHONES FOR FINAL LOADSHEETS

Report Text: My Company issues a provisional loadsheet prior to doors closed, final loadsheets are then transmitted to the aircraft via the ACARS system after push back, usually being received during the taxi phase of the flight. If the ACARS system fails (either on the aircraft or the ground element) there is rarely the option of obtaining a VHF radio final loadsheet due to staffing levels, especially at outstations. Increasingly in the event of known ACARS system problems pilots are being instructed to call by mobile phone to obtain the "final" figures.

That is a straightforward process on our aircraft equipped with satellite phones (obviously approved for in-flight use) but many of our aircraft are not so equipped. Their pilots have to resort to using their personal mobile phones, probably after engine start, to obtain the final figures.

I am concerned that the company is (perhaps accidently or unwittingly) encouraging pilots to ignore the various regulations regarding the use of mobile telephones after engine start/before take-off.

Your thoughts please..?

***CHIRP* Comment:** Many operators have compiled Safety Cases to examine the risks associated with mobile phones and other Personal Electronic Devices. This operator has confirmed that there is no interference hazard to the aircraft from mobile telephones whilst the aircraft is on the ground and that it already allows passengers to use their phones once aircraft have departed the runway on arrival.

While there is no technical or interference hazard from the use of mobile phones, receiving load-sheet data by any means while taxiing risks distraction and error.

TIREDNESS AND FATIGUE AMONGST AIRCREW

Report Text: I have personally experienced two occurrences of pilots falling asleep unannounced at the controls during flight. This is an obvious concern and seems to be due to the amount we are currently flying, which is very close to legal limits. Contributory factors could be a general tendency towards older (55+) pilots, and a lowering of hotel standards with many hotels being very noisy and not having "blackout" curtains. These two events have happened to me during the last 8 weeks of flying, so if this is replicated across the whole airline fleet it is very concerning!

Lessons Learned - Suggestions to prevent similar events would be lower flying hours, more reasonable rostering, more rest, and a better standard of hotel sufficient to gain effective pre-flight rest.

***CHIRP* Comment:** It is not known whether the pilots in these incidents submitted fatigue or other safety reports about what happened. It would be easy to dismiss an unplanned doze as a 'one-off' or 'just one of those things'. Also, if you are tired enough to nod off during the flight, spending time filling in a fatigue report may be the last thing you want to do before a long drive home. This problem is exacerbated by the amount of detail that is necessary in a report to provide sufficient data for meaningful analysis. Good practice, therefore, is for operators to allow fatigue reports to be submitted up to a few days after the FDP has ended. Then there is the question, "why draw attention to myself?" Because it is the professional thing to do – that's why. There is research underway to correlate the effects of age, time in role, commute distances etc with fatigue and FTLs but no amount of research on any aspect of flight crew fatigue will be worth a candle if we can't be relied upon to report it.

With regard to the standard of hotel accommodation, there is a definition in EASA ORO.FTL.105:

> For the purpose of this scheme (EASA FTL), the following definitions shall apply:

> (4) "suitable accommodation" means, for the purpose of standby, split duty, and rest, a separate room for each crew member located in a quiet environment and equipped with a bed, which is sufficiently ventilated, has a device for regulating temperature and light intensity, and access to food and drink;

Unfortunately it seems likely that this definition could be met by a wide range of hotel standards. All the more reason to submit a fatigue reports when appropriate.

ALUMINIUM SPEED TAPE FOR A/C SKIN REPAIRS

Report Text: I was very surprised to see the photographs on the Internet of an engineer utilising speed tape around an engine nacelle to close a gap and therefore reduce vibration. I also see that it was being used on flap repairs.

This tape made by 3M on their data sheet claims that the 425 and 426 variety can be used for aircraft repair. I have seen this tape in our consumable cupboard but have never seen it being used on airframes as a temporary repair as the tape does not have an approval or batch number on it. It has a FAR flammability rating but I was very intrigued when I saw the photos of it being used on an aircraft. Would love to know how you would certify this type of repair for flight as 3M as far as I can remember do not issue a batch or approval number for this product. Look forward to your comments on this and only hope it is not an industry standard as I have never seen it mentioned in chapter 20.

CHIRP Comment: Metallised adhesive tape has been used to carry out temporary repairs on aircraft on non-structural applications for many years. Typical applications are to cover up minor impact damage on tertiary (non-load-bearing) panels until a permanent repair can be effected. It can be used in some instances on flying controls (e.g. flap trailing edges) where cracks in the composite structure have appeared and to prevent moisture ingress, freezing at altitude and further damage. It is not intended for long-term repair and damage should be assessed and repaired (temporary or permanent) or deferred according to the Aircraft Maintenance Manual (AMM)/Structural Repair Manual (SRM). Some manufacturers will specify or support its use through a generic repair requirement, often in the SRM. MELs may instruct its use to repair broken panels. Although regarded as a consumable, speed tape should still have a batch number to show its provenance.

COMPANY ONLINE DOCUMENTATION ISSUES

Report Text: Our Company has made a move towards more and more online publication of information. Our manuals are all available through our web access portal. Recently, we have switched to [ ] and the essential airfield briefs are now moved into [ ] charts and no longer available in PDF.

The OM states that the primary source of info is the on-board EFB and access from the crew rooms. However, as is the reality in low-cost operation, there is not enough time on report or during flight preparation to read up on route and airport information and then use this info for proper flight planning. As such, preparation before flight is essential.

So being able to access the essentials from home is important to properly prepare flights. As we can be sent anywhere on the network to operate any flight, this is also important to be available offline. To facilitate this, the company is providing applications. We are required to have a PC, and the on-board tablets also run Windows, but in recent months the company is becoming more and more iOS focused:

> [ ] chart viewer (including airfield briefing): only available through iPad app. Document viewer: only available on Android or iOS.

If one does not have an Apple device, easy-to-use (and maintain updated) offline documentation has become very difficult. The company does not consider this to be a safety concern as the primary sources are the online chart and document viewer. This completely disregards the reality of the operation in which these online sources are not user-friendly enough and far from always available for good preparation.

With the company openly stating this is not a safety concern, I am actually more concerned about this than ever. There are plans to move more and more paperless (which I applaud), but it seems that the Company does not feel it is important to provide a multi-platform support structure or a company issued device. This worries me as it may become a latent safety threat in which people do not fully prepare, or not prepare as well as they could is information was easily accessible.

I believe there should be a good support structure in place BEFORE we move to all on-line.

Operator Comments: The operator commented that the primary source for all company on-line information is the company intranet portal and all functionality is available through this platform. IOS platforms are secondary devices which are made available for personal convenience and although are an excellent

system for personal use, are not the primary information source. The company intranet portal can actually also be accessed through Android devices via the standard website address. With regard to the issue highlighted here concerning the airfield charts (including airfield briefings); these are indeed also available through the company intranet portal which is accessible from home and all mobile platforms. Airfield briefings and all associated aerodrome charts are located in a drop down menu on company intranet portal, these then appear in PDF format and can be downloaded if required and replicate the crew information and charts on board the aircraft.

CHIRP **Comment:** The operator's response has been relayed to the reporter who had been unaware of how to access information that was available via the portal. Search functions can help but given the amount and importance of the information required by flight crew via company portals, it is essential that operators manage the configuration to maximise clarity and minimise clutter. It is also important to regulate the flow of updates to avoid swamping crew members with a continuous flow of information. Although the reporter explains why there can be a requirement to download information for use off-line, flight crew must ensure that they are using information that is up to date.

SELECTION CRITERIA FOR REDUNDANCY

Report Text: The Company is conducting a period of consultation leading towards a projected number of pilot redundancies. The company has produced a 'matrix' of criteria by which pilots will be selected. A number of the decision points are contentious but the one that causes me the most concern is that they are using sickness as one of the main selection benchmarks (using the 'Bradford' scale, although over two years rather than the more usual rolling one year).

There are two main issues here;

Firstly, pilots do not, in the main, choose to be ill and as catching a cold, for example, is entirely outwith the control of the individual, it is an entirely arbitrary method of selection.

Secondly, it now sets a dangerous precedent in that pilots will now present themselves for duty in an unfit state as they now know that ill-health is a reason for dismissal. This is entirely contrary to the basic flight safety premise of not flying when unfit.

The uncertainty created by the arbitrary model that is being applied in the selection of pilots for redundancy has (particularly in light of the general feeling of distrust towards management and the feeling that a targeted selection model is being used) created a level of distraction amongst my colleagues that I have never experienced before in my flying career. I am also deeply worried by the precedent set and the longer term implications for flight safety within the organisation.

Operator Comments: In all of our business processes and decision-making, safety comes first – and that includes our policy for handling pilot sickness/absence. [We] do not believe the report text accurately portrays our considerations and process surrounding the redundancy matrix and we strongly contest the reporters statement "...pilots will now present themselves for duty in an unfit state as they now know that ill-health is a reason for dismissal."

In compliance with regulations, [ ] will not roster pilots who are not fit to fly. Line management teams monitor this proactively and are empowered to remove from flying any pilot who they consider to be unfit. This is a long-standing [ ] policy.

Our pilots are highly professional and committed individuals. We have not observed a change in their behaviour over the past two months during (and post) the employee consultation. Pilots are still removing themselves from the schedule when they do not feel fit to fly and sickness/absence levels have not reduced since the start of the (now completed) redundancy process – this is a measure we track and monitor closely. This is not a surprise to [ ] management teams as we worked hard to ensure that any unintended consequences were not encouraged.

[ ] applied sickness/absence in the matrix in a manner which is both proportionate and does not encourage adverse flight safety behaviours. To ensure this, the matrix considered a large number of criteria of which sickness/absence was only a single item. As a result of this balanced approach there are pilots who had relatively high sickness/absence scores who were not selected for redundancy. To smooth short term

trends, sickness/absence scores were taken over as long a period as was reasonable (24 months). All scores were reduced to account for normal average levels of actual [ ] pilot sickness. As a result, the overwhelming majority of pilots had no score at all in the matrix for sickness/absence. Of the very small number of pilots who did have any sickness score many were low and negligible. [ ] did not consider sickness absence which took place after the start of the consultation in the matrix, in addition [ ] discounted all sickness/absence for family crisis, bereavement or connected to any protected issue (e.g. disability, maternity etc).

[ ]'s priority is to maintain the highest standards of safety. This commitment remains robust and is monitored. A consultation process is a challenging time for any business, we have taken robust steps to ensure that safety was maintained and our pilots were able to properly discharge their obligations, this commitment to safety remains for all ongoing operations.

[ ] took considerable time and effort to ensure sickness/absence was handled in a responsible way fully aware of the special requirements of aviation. As such we are fully confident that inclusion of sickness/absence - applying the considerations outlined above and in context of other redundancy factors - is neither unreasonable nor inappropriate for [ ] at this time. We would therefore consider the report text to be misleading and incomplete.

CHIRP **Comment:** Operators should be using their Occupational Health resources as a matter of routine to monitor and maintain the health of their staff and distinguish on an individual basis between behaviour required by flight safety obligations and other factors. It is essential that the occupational health advice is given in the context of the individual pilot's working environment, their personal medical situation and knowledge of the legal responsibility of pilots to fly only when fit. That said, it would be hard to argue that this Operator wasn't fully cognisant of the potential safety implications of its redundancy policy or didn't take steps to mitigate them. In terms of fairness to its staff it is probably the best example we have seen and, according to the Operator's data, did not produce a change of staff behaviour. So why did CHIRP receive 4 reports from concerned pilots about feeling pressured to fly when unfit? Is it possible that no matter what mitigations are used, the use of sickness absence data may cause some pilots to feel pressurised to fly when they otherwise would not?

UNTRAINED PERSONNEL WORKING ON LIVE AIRCRAFT

Report Text: I realise this is not the correct place to report this but I have no idea where it should be reported. I found out today that [airline] are currently recruiting people with absolutely no aviation engineering background, giving them a 5 day course and letting them loose on live aircraft at [airport].

I cannot give a direct link to the job but rest assured this practice is happening. As a licenced B1 engineer I am absolutely gobsmacked that this is happening just to save money. Do we have to wait until there is a smoking hole in the ground before this is stamped out?

If you can tell me a name / department of the CAA that I can speak to that would be great. I feel that strongly about this that I am seriously contacting the press. I would love to hear [the airline's] reasons.

CHIRP **Comment:** If you have a concern that it not does not meet the criteria for mandatory reporting or for some reason you do not wish to use a company reporting scheme, CHIRP is the right place. The report referred to an agency recruiting contractors for employment with a Part 145 organisation. The advertisements implied that mechanics could be employed to carry out maintenance tasks on aircraft with as little as 5 days training. All Part145 maintenance organisations are legally required to establish the competence of <u>all</u> maintenance personnel. An individual with <u>no</u> aviation engineering background is unlikely to satisfy that 'competence' even with a 5-day course. This applies to both certifying and non-certifying staff. They may however, be used for non-maintenance roles (cleaning, aircraft handling etc.). The operator advised that it was fully aware of its responsibilities under Part 145 and took action with the agency to address the wording of its advertisements.

ALTITUDE DEVIATION

Report Text: It was a rainy day with very low pressure. The altimeter setting at the field was 987 hPa (29.16). We were assigned the [ ] departure off runway [ ]. After take-off we were switched to departure where we were told climb to 5000ft and fly heading 250. This took us off of the departure and deleted the step climb from 4,000ft to 5,000ft.

After we levelled at 5,000ft we were given a climb to either FL070 or FL080 (I am not 100% sure which). Close to reaching our assigned Flight Level we were queried by ATC as to whether or not we had the proper standard altimeter setting of 1013 hPa set. We then realised we had passed the Transition Altitude of 6000ft without setting our altimeters to "STD" 1013 hPa. We promptly corrected our altimeter setting and altitude but overshot our assigned Flight Level by approximately 450ft.

The crew is experienced with operations in Europe, and the difference between "Transition Levels" and "Transition Altitudes". Prior to the departure we briefed the "Transition Altitude" of 6,000ft as well as set the FMS default Transition Altitude to 6,000ft for a backup. Unfortunately we still forgot to make the correct setting at 6,000ft and deviated from our assigned altitude.

Lessons Learned - Things that can help us from making this same mistake in the future are:

1. Be more vigilant in basic flight deck procedures, especially when operating outside of our normal environment.

2. Listening more closely to ATC for the change in assigned attitudes from "FEET" to "Flight Levels"

3. Our checklist incorporates the altimeter setting in the "After Take-off" checklist. The addition of a "Transition" check that incorporates the altimeter setting could help prevent this error.

4. Being more familiar with the FMS. Entering a new Transition Altitude in the FMS Default page after the current flight plan is loaded will have no change on the current flight. It must be done prior to flight plan insertion.

[Alternative lesson: My suggestion to avoid this happening again is to write the transition altitude on a note card and stick it on the yoke so it doesn't get forgotten about, especially when we don't fly in Europe on a regular basis.]

CHIRP Comment: The report highlights a problem that can be avoided by following the advice in CAP789 Requirements and Guidance Material for Operators, Chapter 12 Flight Procedures:

> 5.1.3 When cleared to climb above transition altitude, a designated pilot (e.g. PF) should immediately command a change to the main altimeter subscale settings saying "Set Standard", prompting a reply from the other pilot (i.e. PM) "Standard set, passing flight level three two for flight level eight zero". (This might be repeated by the Flight Engineer/Systems Panel Operator (FE/SPO).) PF should confirm this, e.g. "Three two, cleared eight zero". (Modified procedures may have to be specified for flights that take place in airspace that has a relatively high transition altitude, e.g. in the USA.)

> 5.1.4 Any change made to a standby or other altimeter subscale setting should be announced by a designated pilot (e.g. PF) when it takes place, e.g. "Standby to Standard". Sometimes, this can be in response to another call or prompt, such as "Passing MFA". In other circumstances, the standby altimeter subscale setting may be set to the lowest forecast QNH for the sector in which the aircraft will be flying, in which case this change should similarly be announced.

> 5.1.5 Before descent, the appropriate QNH should be obtained. Preferably, the standby altimeter should have its subscale set to this QNH before the descent begins or on passing a specified flight level. This change should be announced when it takes place.

> 5.1.6 When cleared to descend below the transition level, a designated pilot (e.g. PF) should command a change to the main altimeter subscale settings saying "Set QNH", prompting a reply from the other pilot (i.e. PM), e.g. "One zero two four set, passing eight thousand for altitude four thousand". (This might be repeated by the FE/SPO.) PF should confirm this, e.g. "Passing eight, cleared four thousand".

Readers may be interested in participating in the CAA's consultation on the proposal for a harmonised transition altitude of 18000ft. The consultation closes on 24 February 2016.

NEW EASA FTL AND OPERATOR POLICY

Report Text: The company I work for is preparing for its transition to EASA FTLs and I am concerned that its policy for delayed reporting appears to suggest that all crew members have an obligation to be contactable by the company in their rest periods & when off duty. Crew members will be required to be available for contact at least 2 hours prior to the original reporting time. I understand EASA has relaxed several rules which were contained within CAP371, but I was not aware that crew members now had an obligation to be contactable in their rest periods and prior to report. Would you be so kind as to confirm this is in accordance with EASA FTLs and has been agreed by the company CAA flight operations inspector when they reviewed and approved our new FTL scheme? Many crew members could still be sleeping at this point prior to an early or night duty disturbing their rest and this will disturb their rest, also it seems to be an unrostered contactable duty prior to each and every duty?

The relevant EASA Regulations is GM1 CS FTL1.025 (d) Flight Duty Period (FDP):

> The operator is required to demonstrate its associated policies and procedures in order to comply with this CS. These policies and procedures do not need to be part of the scheme but need to be part of the Operations Manual and will be reviewed as part of the audit process.
>
> DELAYED REPORTING
>
> 'insert airline name' procedures for delayed reporting should:
>
> (a) specify a contacting mode;
>
> (b) establish minimum and maximum notification times; and
>
> (c) avoid interference with sleeping patterns when possible.

***CHIRP* Comment:** The delayed reporting element of the EASA regulations is covered under 'unforeseen circumstances' and is based on the delayed reporting requirements that are contained in CAP371. The ability to delay crew at their place of rest prior to reporting for an FDP has been a key element of CAP371 for many years. However, the EASA regulations represent an improvement over CAP371 because they require operators publish a delayed reporting procedure, which includes an established notification time to prevent crew from being disturbed when it could reasonably be expected that they are sleeping; operators are also required to record the use of delayed reporting. NAAs have not previously had access to these procedures - or how often they are used. Each operator's procedures are reviewed as part of the review and approval process and a number have been changed. This operator's policy and procedures are compliant with EASA FTLs. Availability for contact 2 hours prior to report time is reasonable assuming a maximum home-base commute of 90 minutes (GM1 CS FTL.1.200) and waking 30 minutes prior to leaving home. Therefore, it is reasonable that operators have a window of time when they won't disturb their crew but can delay them before they leave their place of rest. The contact window can be adjusted for crews down route to take into account likely shorter commuting times.

COMMERCIAL PRESSURE

Report Text: I am becoming more concerned with our operation at [ ].

We have changed to EASA FTLs which has added to the workload. There has also been a pretty constant flow of roster disruption due to new pilots joining the company, and thus a lot of the day flights being utilised for training sectors.

Combine that with our transition to new SOPs; via an aircrew notice and online training video, single engine taxying at the height of summer peak times, monitoring brand new FOs, and getting aircrew notices from management advising us that our fuel loads carried are all being monitored, and the guilty being spoken to by management!

In fact, one aircrew notice suggests that only LVPs and snow are a good reason for extra fuel. So PROB40 +TSGR at destination and planned alternate isn't? Well it is when I'm responsible for passengers, crew and aircraft.

I know that shareholders need a return on their investment, but I honestly don't believe the way this company is being managed is based on a culture of flight safety if I'm totally honest.

I wish the regulator would step in to force all operators to carry a higher percentage of contingency fuel. How many more MINIMUM FUEL calls or MAYDAYS, or worse, will it take before something is done?

Operator Comments: A formal Company Fuel Policy has been in place since November 2011 with regard to discretionary Fuel and relevant guidance is now in place in OMs and Information Notices. There has been no change in the policy with regard to the decision on fuel levels carried; this remains with the commander at all times on all occasions.

The company historically has always monitored fuel levels; this is not a new occurrence. However, this facility is now available on an individual basis for crews to review their own fuel levels. The occurrence rate of flights that have fuel levels requiring crews to declare an urgency or an emergency is being monitored and the risk is being mitigated.

CHIRP **Comment:** Many operators predict with great accuracy the requirements for contingency fuel based on historic records; these predictions are adjusted for individual flights using variables for time of the year, time of day, days of the week etc. The subject of discretionary fuel is raised regularly in CHIRP reports. The amount of fuel carried on any flight is the responsibility of the aircraft commander and commanders should have no difficulty in explaining the rationale for loading extra fuel if asked to do so. Load responsibly!

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