

TWU Local 556 Safety Team

Michael Massoni – 1st VP and National Safety/Security Coordinator

...The mission of the Unions Safety Team is to provide **Union Leadership** in all issues of health & safety; **Technical Counsel** to the TWU Executive Board; **Representation** to our Membership; **Stewardship** within our Company, Industry; its regulatory bodies and most importantly, **facilitate Effective Communications** between all...

To: TWU Local 556, Executive Board
CC: Cuyler Thompson; Kyle Whiteley
Date: October 10th, 2011
Re: October 2011 EB Safety Team Report

Currently the Safety Team has the following open and/or resolved action items:

Aviation Safety Action Program (ASAP) – Reports Under ERC Review = **66**

ID - Event Date - Status			Summary
304	8/18/2011	Sent to ERC for review	Company safety Policy/Problem Enforcing FARs/FWD Galley not properly secured
305	8/20/2011	Sent to ERC for review	Company Safety Policy/Door procedures
307	8/20/2011	Sent to ERC for review ✓	Equipment Inspection/Failure to check emergency equipment.
310	8/27/2011	Sent to ERC for review	Arm/Disarm doors
313	8/29/2011	Sent to ERC for review ✓ ✓	Flight Deck Door Procedures
314	8/28/2011	Sent to ERC for review ✓	OWWE Briefing
315	8/29/2011	Sent to ERC for review ✓	OWWE Briefing
319	8/29/2011	Sent to ERC for review ✓	Arm/Disarm Door/forgot to disarm aft entry door
320	8/27/2011	Sent to ERC for review	Boarding/Failure to comply with boarding procedures

323	8/31/2011	Sent to ERC for review		pax moving around during taxi
324	8/31/2011	Sent to ERC for review	✓	Arm/disarm Doors/Wheelchair passenger requested assistance/ Did not disarm forward galley.
329	9/5/2011	Sent to ERC for review	✓	Exit Row Briefing/OWWE/Forgot to brief overwing due to trying to secure cabin before pushback and briefed them right after takeoff.
333	9/6/2011	Sent to ERC for review		aft jumpseat would not pop up unassisted
335	9/12/2011	Sent to ERC for review	✓	Not on Assigned Jumpseat For Takeoff
338	9/14/2011	Sent to ERC for review		Arming/Disarming/possible did not disarm galley door.
339	9/14/2011	Sent to ERC for review	✓	Exit Row Briefing OWWE Briefing/Failure to brief exit seat customers
340	9/15/2011	Sent to ERC for review	✓	Failure to brief exit rows
341	9/16/2011	Sent to ERC for review		Passenger was very upsetting to another
343	9/20/2011	Sent to ERC for review		Flight Attendant Manual
344	9/16/2011	Sent to ERC for review		passanger standing in galley
345	9/21/2011	Sent to ERC for review		Arming/Disarming/I failed to crack aft doors before counting through passengers and when knocked on passenger opened door for provo.
346	9/22/2011	Sent to ERC for review		Arming/Disarming Doors
347	9/22/2011	Sent to ERC for review		Oversized Carry on Item/Larger roller bag customers seat was not discovered during walk through

348	9/22/2011	Sent to ERC for review	Exit Row Briefing/OWWE/ forgot to brief the exit row passengers
349	9/25/2011	Sent to ERC for review	Exit Row Briefing/ OWWE/failure to brief exit rows
350	9/26/2011	Sent to ERC for review	Problem Enforcing FARs/FAA inspector questioned us
351	9/26/2011	Sent to ERC for review	Ops agent failed to notify me of a UM and didnt provide specials sheet.
352	9/27/2011	Sent to ERC for review	Arm/Disarm Door/I disarmed the fwd galley door before I cross checked fwd entry door.
353	8/18/2011	Sent to ERC for review	Security Concerns/A PAX told the B FA twice that she had a bomb in her backpack.
354	9/28/2011	Sent to ERC for review	Boarding/left boarding position
356	9/29/2011	Sent to ERC for review	Child Restaint Device/Failure to move car seat from row in front of OWWE prior to push.
357	9/28/2011	Sent to ERC for review	Boarding / Ground Operations / Ops did not ask if we were ready to board and closed door prior to all pax being seated
358	9/29/2011	Sent to ERC for review	Failed to make a PA regarding aborted landing and fly-around.
359	9/29/2011	Sent to ERC for review	Boarding/ I was off the aircraft and returned before scheduled arrival time, boarding began without me in boarding position.
360	10/1/2011	Sent to ERC for review	OWWE/Passenger seated in overwing with seat belt extension.
362	10/2/2011	Sent to ERC for review	Arm/ Disarm door
363	10/1/2011	Sent to ERC for review	Flight Attendant Binder Violation/ I forgot FA manual and flew 3 legs to (city).

364	9/28/2011	Sent to ERC for review	Maintenance/ Right hand jams between the FWD entry door assist handle and jumpseat when operating the door.
365	10/2/2011	Sent to ERC for review	Maintenance/ When operating the FWD Entry door, the right hand jams between the inside assist handle and the jumpseat.
366	10/4/2011	Sent to ERC for review	4th jump-seater in uniform assisted me with drink service while the seat belt sign was off since I was not feeling well.
367	9/28/2011	Sent to ERC for review	Failure to Stow Personal Items/ failure to secure hand bag for take off
369	10/6/2011	Sent to ERC for review	Flight Attendant Binder Violation/ Updating manual
370	10/2/2011	Sent to ERC for review	Slide Deployment/ Forgot to disarm door before opening

ASAP Reports received to date: **370**

▪ Accepted Reports to date = **304**

Aviation Safety & Health Database Int'l (ASHDI) – Reports Under Review = **0**

<u>Report</u>	<u>Acceptance Deadline</u>
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ASHDI Incident Reports received to date:

▪ Accepted Reports to date (TWU) = **196**

Southwest Airlines Event Notification System (ENS)

Fielded Events for Period:

- 09/15/11 through 10/10/11 = **97**
 - Emergencies Declared = **12**
 - All OF 2011 to Date = **1103**
 - ALL OF 2010 = **1413**
 - ALL OF 2009 = **1210**
 - ALL OF 2008 = **940**
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- The TWU Local 556 Safety Team has been approached by AFA-CWA to partner with them in creating an **AirTran Inflight Aviation Safety Action Program (ASAP)**. This for the purpose of establishing the program with AirTran Flight Attendants in order to make their transition to SWA and TWU that much simpler and to diminishing the need to educate and train them in the ASAP process. One stipulation that was made clear to AFA-CWA is that the AirTran MOU and LOU would have to mirror one another in order for us to agree to the creation of the program. AFA-CWA current practice throughout their carriers is to have the Company pay for the lost time associated with the Union's ERC participants. This would have to be reconciled against our current practice of the Union funding its ERC participants before we could move forward on the matter. TWU Local 556 Safety Coordinator, Michael Massoni has had preliminary talks in the matter with SWA Inflight and will be taking the matter up with VP of Cabin Services, Mike Hafner within the next several weeks.
- TWU Local 556 Safety Coordinator, Michael Massoni has had several follow-up meetings with the operational departments concerning the path forward on **the unreasonably hot cabin temperature issue and the associated article 25 grievance** that was filed. It has been decided that a task force will be formed including Members of TWU Local 556's Safety Team that will sort out the engineering fixes, operational procedures and controls necessary to mitigate the unacceptable working conditions our Flight Attendants endured this summer and ensure required strategies are in place prior to next year's hot weather operations. Until all fixes are in place on the matter (on paper and in practice), our article 25 grievance will remain in force.
- **Southwest Airlines Maintenance completed the cleaning of the unauthorized markings from aircraft exhaust plugs.** This cleaning targeted only the exhaust plugs on both engines and will include the entire fleet. Other markings on the aircraft (struts, bins, etc.) were also cleaned over the last several weeks. As aircraft were cleaned, Southwest Airlines Maintenance forwarded copies of the completed tail numbers to Corporate Security, so an updated list could be maintained. Southwest Airlines has consulted with Federal intelligence agencies and is pursuing this as an internal vandalism issue. This issue is being taken very seriously, and they will continue to work in cooperation with both local and Federal law enforcement agencies.
- During the weekend of September 24th an annual event called "Street Vibrations" was held in Reno. **Reports of violence were associated with the event at, and/or near, the Reno Nugget Crew hotel.** This included a shooting event that took place in the Nugget Casino. At 4:00pm on Saturday, Nevada public authorities increased security in the vicinity of the Nugget, and required all associated "Street Vibrations" vendors leave the area and relocate to downtown. Additionally, the Nugget increased security in order to ensure the Safety and Security of our Crews. The Street Vibrations event ended on Sunday and was no longer a factor affecting our RNO operations. A joint RBF was issued by Sonya Lacore and Michael Massoni informing all Flight Attendants of the incident, increased security for our Crews and emphasized the importance in following normal RON security precautions and to continue exercising the utmost situational awareness in both personal and professional settings.

OPEN DISCUSSION ITEM(S):

- The Southwest Airlines Flight Attendant Aviation Safety Action Program (ASAP)
 - o Continued Education & Awareness
- 737-800 LOPA Task Force
 - o 2nd Service Procedure Validation Process
 - o Flexibility in Service Procedure Flows after Roll-out
- Extreme Temperature Operations
 - o Article 25 Grievance
 - o Meeting(s) Overview and Moving Forward
- Symbols on Southwest Airlines Aircraft
- SNPRM (Qualification, Service, and use of Crewmembers and Aircraft Dispatchers; Notice of Proposed Rulemaking)
 - o Comment Submission (Attachment)
- Professional Standards Chairperson Interviews
 - o Rescheduled to October 11th, 2011 in Dallas
- OSHA 300 Reports to DEBM's

SCHEDULED AND STANDING MEETINGS:

- **Monday, October 10, 2011** – Health & Safety Coordination (HASC) with Inflight Safety and Regulatory Standards
- **September 30; October 6, 13, 2011 1130hrs–1430hrs CDT** – ASAP ERC Meeting(s)
- **Thursday & Friday October 13-14, 2011** – International Health and Safety Taskforce Meeting in NYC
- **Monday September 19; Monday October 3rd and 17, 2011** – Overwater / Close-in International Flying Negotiations
- **Monday through Thursday October 24 – October 27, 2011** – 3rd Membership Meetings of 2011
- **Monday September 12, 2011** – Extreme Temperature Operations/Gasper Fan Follow-up Meeting
- **Tuesday September 27 & Tuesday October 4, 2011** – Executive Board Conference Calls

Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers

September 19, 2011

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Qualification, Service, and use of Crewmembers and Aircraft Dispatchers;
Notice of Proposed Rulemaking
Docket Number FAA – 2008-0677 Notice No. 08-07

Dear Sir or Madam:

On behalf of the 140,000 active members of Transport Workers Union of America, AFL-CIO (TWU) and especially the nearly 10,500 Flight Attendants at Southwest Airlines and Allegiant Air; 250 pilot instructors at American Airlines, American Eagle Airlines, Southwest Airlines and US Airways; 150 flight simulator engineers at American Airlines, Continental Airlines and US Airways; and over 1,000 Aircraft Dispatchers at Airtran Airways, Alaska Airlines, American Airlines, American Eagle Airlines, Air Wisconsin, Atlantic Southeast Airlines, Chautauqua, Continental Airlines, Express Jet Airlines, Executive Airlines, Frontier Airlines, Hawaiian Airlines, Horizon Air Industries, Island Air, Mesaba, Pinnacle, PSA Airlines, Republic Airways, Ryan International, Southwest Airlines, Shuttle America, Spirit Airlines, Sun Country, US Airways, UPS, and World Airways; we thank you for the opportunity to provide comments on the Supplementary Notice of Proposed Rulemaking "Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers," released and published on May 20, 2011 by the FAA which will directly affect our members.

Before commenting on any portion of the SNPRM, please let it be understood that the TWU clearly with the numeration of all of the air carriers above, represents a great deal of aviation professionals. Therefore, we would request to be a part of any future Aviation Rulemaking Committees (ARCs) that are created in respect to Aircraft Dispatchers or Flight Attendants. Furthermore, we would like to open the door to extending our involvement with any future ARCs that concern our concentration of other airline

professionals as well; Airline Mechanics, Operations Agents, Pilot Instructors, Flight Simulator Engineers, and Fleet Ramp Service Professionals.

As a representative of professionals who understand and respect the need for aviation safety, we broadly support the need to enhance, reorganize, and revise the affected training programs. For the flight attendants, pilot instructors, flight simulation engineers, and flight dispatchers of the TWU, maintaining the highest possible level of safety is top priority. We are pleased to see the FAA's endeavor to improve safety through stronger training programs and operation protocols, and we are grateful for the opportunity to comment on the proposed rule.

Many of the opinions we express in our comments are informed not only as a result of our members' tireless advocacy for safety, but as a reaction to FAA Administrator J. Randolph Babbitt's vision of a "single level of safety" across the aviation industry. Administrator Babbitt has written on this topic at length, but we were left with the strongest impression of the importance of a single level of safety when he addressed a conference of TWU members in April 2011. The SNPRM goes a long way in improving safety, and for the most part, does so in a consistent manner. Many of our critical comments below come as a result of our desire to achieve such consistency throughout the rulemaking.

Pilot (and Flight Engineer) Instructors / Ground Instructors

§ 121.1281 Instructor (Academic and Job Performance): Training, evaluation, and recent experience. We support the FAA's efforts to ensure that pilot and flight engineer instructors are well-qualified and highly-trained. In fact, to realize those goals, we call for the creation of a certification program for ground instructors, which will help to ensure consistency across the industry and move one step closer to achieving a single level of safety.

§ 119.65 Management and technical personnel required for operations conducted under part 121 of this chapter. Additionally, we propose including ground instructors in the FAA's required operations personnel.

§ 121.1345 Training program: Mandatory use of flight simulation training devices. We are of the belief that FSTDs must be highly-realistic, with the accurate look, feel, and functionality of the flight deck environment. FSTDs below Level 6 greatly compromises the ability of the ground instructors to adequately prepare pilots for various situations they may encounter in a real flight situation. This may open the door to situations that could alter the safety of passengers.

§ 121.1335 Training program: Curriculum category programmed hours. Regarding academic training in "a training environment other than a classroom¹" (or distance learning), based on the experience of TWU ground instructors, current standards cannot guarantee that trainees get the most out of the distance learning experience. To begin with, the term "distance learning" is not defined by the FAA so much as the FAA stipulates what is not included in the definition: training that takes place outside of the classroom. For our purposes, we assume this will indicate online, or e-learning. E-learning, when done well, can be a useful tool. Currently, however there is no

¹ 14 CFR Parts 65, 119, 121, 135, 142 page 81

requirement that trainees be able to interact with their instructor. By requiring that e-learning take place as a synchronous class— giving the trainees an opportunity to pose questions to the instructor and to discuss personal experience with the other trainees— will ensure that the e-learning is as constructive as possible. Furthermore, there must be a way to positively identify each training participant. Otherwise, there is no way to be sure that the individuals taking the course are in fact those responsible for learning the material.

Flight Dispatchers

§ 121.126 Flight following system. Contrary to what is proposed in the SPRM we believe that requiring dispatch certificates for supplemental operations will greatly improve safety. Any creation of separate rules for supplemental operations deviates from the FAA's stated goal of achieving a single level of safety. To allow for maximum operational control and consistent safety rules, we advocate applying the existing requirements for Domestic or Flag to supplemental operations as well.

Dispatch Resource Management. We recommend that the protocols in Advisory Circular 121-32A incorporating DRM with operational control and other functions of the carrier, be given regulatory force. As is often the case, industry best practices cannot be counted on in every instance, and in order to maintain a single level of safety, all carriers must adhere to the most constructive DRM protocols.

Appendix T – Aircraft Dispatcher Qualification Performance Standards. We agree with the FAA's finding that "there is a need to be able to assess and evaluate a dispatcher's knowledge as well as the dispatcher's ability to apply that knowledge with direct instructor-student interaction in the areas designated in the dispatcher QPS."² Again we urge that distance learning for dispatchers, while blatantly inappropriate for some subjects, is wholly unnecessary for the rest. Due to the existence of Systems Operations Control Centers where dispatchers work, the convenience of distance learning is irrelevant. Allowing up to 50 percent distance learning for a group that can easily conduct most trainings in the more-effective classroom setting, is unnecessary and invites an element of safety reduction.

§ 121.134 Preparation of manuals. We fully support the FAA's intent to require carriers to prepare an Aircraft Dispatcher Procedures Manual (ADPM). Though some choose to do so presently, others do not, and regulation will help to guarantee that there is no ambiguity as to which manual's provisions dispatchers are to adhere to. Similarly, we agree that inclusion of the subjects listed in *§ 121.540 Manual procedures requirements* is critical.

§ 121.1411 Aircraft dispatcher: Employment and certificate. As stated in our response to the original NPRM, "we do not support contract dispatching because we believe it creates security issues ... inconsistent with the objective of the NPRM."³ We were disappointed to see that it was not removed in the SNPRM, especially considering that TWU represents nearly 85% of all US dispatchers, and speaks with considerable authority on the matter. TWU Locals 550 and 542 have submitted responses listing

² 14 CFR Parts 65, 119, 121, 135, 142 page 83

³ August 10, 2009 comments on Docket Number FAA – 2008-0677 Notice No. 08-07 from the Transport Workers Union of America, AFL-CIO

myriad reasons that contract dispatching not only could possibly hinder safety, but that it absolutely will.

One of the most glaring issues at hand is that contract dispatchers may well be assigned to dispatch for multiple airlines. As Local 550 states, this would place “unachievable requirements⁴” on the dispatchers, demanding that they be knowledgeable on several models of aircraft, operation manuals, company protocols, and corporate cultures, in addition to daily changes via read before dispatch notices, policy changes, and training notices. The contract dispatcher would be hard-pressed to participate effectively in DRM, as the resource management philosophy is so deeply engrained in the team concept and the dispatcher would be a vendor, rather than a fully invested member of the company’s team. In addition, allowing for dispatch to work from a location other than a carrier’s Systems Operations Control Center would interfere with the excellent communicative abilities of the departments stationed there (often flight operations, scheduling, maintenance, dispatch, meteorology, and management). Furthermore, we view it as very bad practice to allow half of the safety critical dispatch-PIC relationship to be contracted out, as contracts are all too often rewarded to the lowest bidder.

Flight Simulator Engineers

The SNPRM makes no effort to establish qualifications and training requirements for the engineers who repair and maintain the FSTDs that ground instructors and pilots rely on for training. We recommend the creation of such a rulemaking.

Flight Attendants

Check Flight Attendant supervision—

§ 121.1301 Flight attendant: Training and evaluation

§ 121.1303 Flight attendant: Continuing qualification

§ 121.1305 Flight attendant: Aircraft operating experience

§ 121.1309 Flight attendant: Requalification

We reiterate our support for the necessity of check flight attendants. In order to provide the utmost in operational safety and oversight, the supervision of a check flight attendant is essential— not only for initial training, but also for all transition, recurrent, and requalification training.

§ 121.1209 English language requirement. We applaud the FAA’s efforts to ensure that crewmembers are proficient in the English language, though we find the verification methods outlined in the SNPRM to be insufficient. Ensuring compliance by “completion of a certificate holder’s approved training program conducted solely in English,”⁵ does not in any way guarantee the objective, that the trainee can “(1) Read, write, speak, and understand the English language”⁶ and “(2) Have his or her English language and verbal and written communications understood.”⁷

In some cases, completion of a training program may satisfy the requirement that the trainee understand English, but cannot prove whether s/he can read, write, or speak, or that the trainee’s English communication is understood.

⁴ September 19, 2011 comments on Docket Number FAA – 2008-0677 Notice No. 08-07A from Transport Workers Union Local 550

⁵ 14 CFR Parts 65, 119, 121, 135, 142 page 272

⁶ Ibid.

⁷ Ibid.

We encourage the FAA to find an alternative verification of English language proficiency, and for this verification to be made prior to the crewmember's enrollment in English-language training courses. Allowing a carrier to conduct trainings without knowledge that the trainees understand the language it is presented in is irresponsible, especially considering the safety implications involved in all aspects of aviation training. To go further and take completion of such a training as proof that the trainee can communicate in English is dangerous, and could lead to a breakdown in CRM or miscommunications in a crisis environment.

Industry Fatigue and Safety

In recent years it has become painfully clear how important it is for all aviation professionals to be alert and well-rested when on duty. We applaud the efforts of the FAA to promulgate and enforce fatigue rules for pilots. Furthermore, we encourage that rules be written for those work groups currently without duty-time regulations, and that existing rules be revised to account for fatigue science.

In closing, let us reiterate our gratitude for the opportunity to comment on this matter. When enacted, taking the expertise and insight of our members into consideration, these rules will enhance operations and training programs and serve as a step in the right direction for consistency, transparency and standardization.