September 12, 2023

The Honorable Maria Cantwell
Chair
Senate Committee on Commerce,
Science, and Transportation
U.S. Senate
Washington, DC 20510

The Honorable Ted Cruz
Ranking Member
Senate Committee on Commerce,
Science, and Transportation
U.S. Senate
Washington, DC 20510

The Honorable Sam Graves
Chairman
House Committee on Transportation
and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
House Committee on Transportation
and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Tammy Duckworth
Chair
Subcommittee on Aviation Safety,
Operations, and Innovation
Senate Committee on Commerce,
Science, and Transportation
U.S. Senate
Washington, DC 20510

The Honorable Jerry Moran
Ranking Member
Subcommittee on Aviation Safety,
Operations, and Innovation
Senate Committee on Commerce,
Science, and Transportation
U.S. Senate
Washington, DC 20510

The Honorable Garret Graves
Chairman
Subcommittee on Aviation
House Committee on Transportation
And Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Steve Cohen
Ranking Member
Subcommittee on Aviation
House Committee on Transportation
and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Chair Cantwell, Chairman Graves, Chair Duckworth, Chairman Graves, Ranking Member Cruz, Ranking Member Larsen, Ranking Member Moran, and Ranking Member Cohen:

The Federal Aviation Administration (FAA) holds the preeminent responsibility for ensuring the safety and reliability of the aviation industry. The United States is the worldwide leader in aviation innovation and must continue to push for the highest standards. Continuous safety improvement in a constantly changing technological environment is a huge challenge, one in which policymakers, regulators, operators, and manufacturers all play a role. To that end, facilitating the adoption of new technologies that enhance safety should be a bedrock principle for government and industry alike.

As Congress debates the FAA reauthorization this year, the Senate Commerce Committee remains at an impasse over issues related to the regulations that govern how future pilots are trained and how they accrue the necessary experience to become an airline pilot. However, to date, the current debate has focused primarily on whether to maintain the 1,500-hour rule implemented in 2012. From our perspective, the 1,500-hour rule and its various provisions are a good thing. Policymakers must continue to ensure advances in training technology improve the safety and quality of future commercial pilots, so that the 1,500 hours are used toward the best training outcomes.

Since the tragic crash of Colgan Air Flight 3407 almost 15 years ago, there have been significant advances in technology that are incorporated into a pilot's training upon an airline hiring them, but these technologies have not improved the 1,500-hour path to becoming an airline pilot.

Modern, state-of-the-art flight simulators accurately recreate the experience of flight operations in a fully immersive experience, forcing pilots to encounter aircraft malfunctions, including rare events like rapid decompressions, emergency descents, high-speed rejected takeoffs, dual engine failures, severe icing conditions, flight control malfunctions and full stalls, all without placing any lives in danger. Simulators also present the opportunity to incorporate actual accident and incident scenarios into mainline training. Furthermore, the newest simulators are much less expensive to purchase and operate, lowering barriers to entry into the profession, and opening up high quality training to a wider group of aspiring pilots. Incorporating this type of realistic training and experience in a structured and controlled way will add to the existing margin of safety in commercial operations. Despite these benefits, regulations today only permit a small fraction of an ATP candidate's experience to be in these types of advanced simulators.

Simulators also present the opportunity to incorporate actual accident and incident scenarios into training. For example, we believe all pilots should be required to fly scenarios similar to those resulting in the Colgan accident, not just once but dozens of times, and to show appropriate response actions for that aircraft in the simulator before being granted an ATP certificate. They should experience the factors that led to that tragedy and successfully recover, so that such an accident can never happen again. There should be a continuous feedback loop so that as new errors, whether they be mechanical, environmental or pilot-induced, from FAA and NTSB investigations and recommendations, are rapidly incorporated back into training. For example, if such scenario-based simulator training was a routine part of gaining the 1,500 hours required for the ATP, we could now require updated training on the kinds of scenarios that have led to the recent rash of runway incursion near-misses. Like training for an athletic endeavor, a high volume of repetitions of high-quality exercises improves performance and "muscle memory". Requiring the repeated practice of the prevention of and recovery from myriad real-world accident scenarios in full-motion flight simulators will make better pilots.

As pilot training technology evolves, it is the responsibility of the FAA and policy makers to evolve with it. Today, simulators are used worldwide for training by most commercial airlines and are approved by global aviation regulators. Pilot training and simulation technology advances have prompted the U.S. Air Force to more than triple the amount of simulator training for its new pilots. Policymakers and the FAA hold military pilot training and fight experience in such high regard that a pilot leaving the military for an airline pilot job needs only 750 hours of total military time instead of the 1,500 hours required for an Air Transport Pilot certificate. In effect, credit is given for the superior training provided by the military, which includes significant emphasis on simulator training.

Modern training systems keep performance data to allow better evaluation of a pilot's performance, and scenarios can be repeated until the skills have been mastered. Evaluation of performance data is not feasible for the vast majority of the unstructured 1,500 hours of aeronautical experience gained in aircraft under today's regulatory framework, particularly when much of that time can be attained without the presence of a qualified instructor.

Advanced simulators produce safer pilots without compromise. This training, especially when conducted as part of an FAA-approved syllabus, prepares pilots in a controlled and structured way, above and beyond "accumulation of flight hours" and cannot be ignored.

We must continue our work to move the ball forward on aviation safety, and advanced simulator training should be a critical component of those efforts.

The flying public expects and deserves experienced pilots trained with the most advanced tools available. Their safety should be in the hands of pilots who have benefited from the extensive use of advanced simulators.

Thank you for your consideration of our views and we stand ready to work collaboratively to move forward on aviation safety.

Sincerely,

Randy Babbit
Former Administrator
Federal Aviation Administration
Former President
Airline Pilots Association, International

Marion Blakey
Former Administrator
Federal Aviation Administration
Former Chair
National Transportation Safety Board

Steve Dickson
Former Administrator
Federal Aviation Administration

Dan Elwell
Former Acting Administrator
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Jane Garvey
Former Administrator
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Michael Huerta
Former Administrator
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Allan McArtor
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Lee Moak
Former President
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Billy Nolen
Former Acting Administrator
Federal Aviation Administration

CC: Senate Majority Leader Charles E. Schumer, Senate Minority Leader Mitch McConnell, Speaker of the House Kevin McCarthy, House Democratic Leader Hakeem Jeffries