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May 14, 1994

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Mark Gerchick
FAA/Office of the Chief Counsel
Attn: Rules Docket (AGC-200)
Room 915G, Docket No. 28154
800 Independence Avenue S.W.
Washington, D.C. 20591

29571 /QA

Dear Mr. Gerchick:

It is my understanding that you are currently accepting comments regarding the aggressive efforts by the Professional Pilot Foundation (PPF) to extend the retirement age of commercial airline pilots beyond the age of 60. My comments about the NPRM are laid out in the letter I have attached to this cover letter. I have attached 3 copies of the letter because I understand that you want these comments in triplicate. I hope that you will carefully consider the points regarding this volatile issue I have raised. Thank you for your time.

Sincerely

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Dear Mr. Gerchick:

I am strongly opposed to the efforts of the Professional Pilot Foundation (PPF) to increase the commercial pilot retirement age beyond age 60. Apparently, their lobbying efforts have convinced many mid level bureaucrats in Washington that their opinions represent those of the vast majority of airline pilots. That is simply not true! In fact, the majority (85% by poll) of pilots at American Airlines, where I fly DC-10's, feel that the age 60 rule should stay the way it is! Why?

The following is a short list of reasons why it is imperative that we maintain the age 60 retirement requirement:

- Not all people age alike. I would guess that roughly 40 - 50% of the pilots I have worked with over the years are youthful both physically and mentally as they retire. The problem is that so many more people are not. This difference in the way we all age is sometimes startling. Just last week I flew with a pilot who seemed like he was older than my dad who is 74. While on the trip, we ran across another pilot who was 3-4 months older than the gentleman I was with, but who seemed like he was 40 both physically and psychologically. To assume that a psychologist or physician, during a routine medical exam or pre-rehearsed checkride, can screen out those individuals who have aged rapidly from those who haven't is hokey.
- Many of those individuals who age faster develop communication problems with other crew members who are physically and mentally much younger. This in turn causes communication breakdowns in the cockpit and leads to human factor errors by the entire crew.
- Many of the older pilots never get up to speed with the new automated computer controlled flight management systems. The airline flight and training departments are aware of this, but routinely run older pilots through training curriculums on advanced aircraft and sign them off as proficient because they can pass a simulator check ride. But in reality many of these older pilots have only a rudimentary knowledge of how

the flight management systems operate. The dirty little secret is that all airline training departments rely heavily upon sharp co-pilots to carry older crew members work load with automated systems while they come up to speed on the systems. Systems that many older pilots never thoroughly understand. I am speaking of first hand observations, having witnessed this phenomenon numerous times ever since aircraft with automated cockpit systems showed up in the airline fleets.

- Older pilots cognitive and motor skills decay as they approach 60. More than once I have flown with pilots who were fighter pilots in some former life but as they approach retirement age can't seem to even fly a decent ILS let alone make a smooth landing after dark. **It's just a fact of life that our night vision decays as we age along with our coordination and motor skills!**

Furthermore, it has been my observation in over 18 years of flying as a professional aviator that a large majority of those pilots who desire to fly past 60 are those individuals whose personal lives are a mess. Many of these vocal members of the fly past 60 crowd are individuals who have blown out of two or three marriages and literally need to continue flying in order to financially support their personal excesses at the expense of others who don't share their psychological instabilities. Whenever I hear these individuals talk about flying past the age of 60 it troubles me. They are pushing to extend the retirement age and pushing the passenger safety envelope because of their own shattered personal lives.

Finally, it has recently, come to my attention that the British have raised their retirement age to 65, with the requirement that all pilots over 65 be accompanied in the cockpit by another pilot under the age of 60. My question is, if it's safe to fly past 65, why have the British required that another pilot under the age of 60 accompany the older pilot. Clearly it isn't safe, or they wouldn't require that the second pilot be under the age of 60! I hope that you will carefully consider this information whenever you hear the bleating ad nauseam attempts by members of the Professional Pilot Foundation to extend the airline pilot retirement age beyond the age of 60.

Sincerely,



Scott Robert Gibson
American Airlines