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May 8, 2009

REFERENCE:

Notice of Proposed Rule Making, Docket FAA-2006-0677

The following three questions are submitted by UPS Airlines:

Question I

In section Ill, B. Need for Safety Improvements and FAA Actions, background information for this proposed rule states:

"As part of the regulatory review, the FAA evaluated its experience with the Advanced Qualification Program (AQP) currently in place at many part 121 *air carriers. AQP is an alternative method using advanced simulation equipment and objective performance standards for training and testing crewmembers. The FAA's review of AQP revealed the need to improve the traditional qualification and training programs conducted under subparts N,* O, *and P"*

Referring to Table I A, the proposed rule also states: *"Programmed hours consist of baseline and minimum hour requirements. The FAA bases the proposed baseline and minimum program training hours on national norms, FAA handbooks, traditional and A QP training programs, and problems routinely encountered by POl. "*

AQP methodology is a proven method of designing and developing qualification programs. A central process of an AQP is the Instructional System Design methodology. Table I A (Appendix Q) specifies both baseline and minimum programmed hours for each training category. Since AQP requires the application of the Instructional System Design methodology to analyze job tasks and training requirements, can you describe the Instructional System Design methodology used to determine these baseline and minimum hours found in Table I A?

The knowledge of the ISD methodology employed would help a carrier better evaluate the potential variations expected from baseline and minimum hours required as related to

the carrier's individual operations, objective performance standards, and crewmember composition.

Question 2 (related to question 1 above)

Table 2A (Appendix Q) specifies required subjects by training category. What methodology or Instructional System design process (task analysis) was used to determine the required subjects within each training category?

Question 3

Previous seat dependant training guidance (FAA Order 8400.10, 8900.1 and HBAT 9513) has stated that operators shall "identify and document" those seat dependent tasks specific to their aircraft and operation when a qualified crewmember is assigned to perform duties in another position. HBAT 95-13 also describes a process that the operator shall use to "Determine the level of training and currency that will ensure operational safety as determined by the degree of required skill and knowledge." The bulletin also states (7,b) s that when "Specific differences arise between the operator and its POI concerning a particular task, the operator may consider conducting simulator sessions with a representative number of crewmembers to determine if those crewmembers are able to safely conduct the flight operation from a cockpit duty station which they do not normally occupy."

Other guidance in Order 8900.1 refers to an example of required seat dependent task training as "tasks related to the SIC position, such as checklist flow, and paperwork such as flight logs and weight and balance"

Our question has two parts:

a. What methodology or ISD process was used to determine that seat dependant knowledge and skills training must be accomplished through a Line Oriented Flight Training scenario (LOFT)? This requirement appears to go far beyond any specific and limited seat dependent knowledge and skills a carrier may identify as unique to their aircraft and operation.

b. Why does Seat Dependent Task Training require at least one LOFT scenario when seat dependent tasks are task specific and not line oriented?

Sincerely,

Michael Tarsa
MD-11 Flight Training Supervisor