



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, S.W.
Nassif Building, Room PL-401
Washington, DC 20590-001

Re: Docket No. FAA-2004-19400, Commercial Aviation Safety Team Safety
Enhancements

FAA-2004-19400-2

The Air Line Pilots Association, International (ALPA), representing the interests of over 64,000 pilots flying for 43 airlines in the United States and Canada, has reviewed the referenced docket. ALPA supports the FAA and the recommendations of the National Civil Aviation Review Commission (NCARC) to voluntarily share safety information and protect this information from public release. ALPA agrees with the NCARC when it states in its publication, *A Consensus for Change*, December 1997, that they believe "the accident rate can be reduced, but this will take a comprehensive and concerted program by government and industry that will require new ways of doing business with each other and a greater emphasis on cooperation and collaboration." It further states, "FAA and the aviation industry must develop a strategic plan to improve safety, with specific priorities based on objective, quantitative analysis of safety information and data." Regarding safety risk management programs, the publication states, "This should include self-audit and self-disclosure programs within aviation companies, protecting and sharing safety information in non-punitive ways, and encouraging research to support these activities. Where possible, these programs should include the analysis of real flight and operational data. The aviation community must look deeper than accidents and incidents to identify latent and emerging problems and fix them before a mishap occurs."

ALPA is in full support of this docket, but we offer the following comments for improvement.

1. In the subheading **Description of the Proposed Safety Information To Be Protected**, we recommend adding the following sentence to the end of the first paragraph: *Its focus in the future will be on incident/precursor data to mitigate risks prior to fatal mishaps.*
2. In that same subheading, we recommend adding the following to the last paragraph: *and reducing future risk in civil aviation.*
3. In the subheading **Summary of the Safety Information To Be Protected**, #5, we may want to have language that refers to workgroups not only established by CAST,

but also associated with CAST, such as the VASIP data-sharing process. This process includes an issues-resolution section that uses the CAST process as well as calls for CAST JSAT and JSIT team members to participate. By including some language about this here, it ties the joint efforts together.

4. In the subheading **Summary of the Safety Information To Be Protected**, Section B., add after number 6: *7. All information related to changing risk, emerging threats, or accident precursors. Incident data (e.g., FOQA and ASAP) used as a diagnostic tool would be included.*

Sincerely,



Terry L. McVenes
Executive Air Safety Chairman

TLMc/kr