World Atlantic Airlines

DEPARTMENT OF TRANSPORTATION
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DOCKET OPERATIONS

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Federal Aviation Administration
Office of Chief Counsel
800 Independent Avenue, SW
Washington, DC 20591

Subject: Petition for Exemption

Reference: 14 CFR 121.434 ©(1)(ii) "Operating Experience, Operating Cycles and Consolidation of Knowledge and Skills".

Dear Sir or Madam:

In accordance with provisions of Title 14, Code of Federal Regulations (14 CFR) 11.25, Caribbean Sun Airlines dba World Atlantic Airlines (2WAA) petitions for exemption from FAR 121.434 (c)(1)(ii) of Title 14, Code of Federal Regulations. The exemption would allow 2WAA to substitute a qualified and authorized check Airman in place of an FAA Inspector to observe a qualifying Pilot in Command (PIC), while the PIC is performing assigned duties during at least one flight leg, that includes a takeoff and landing, when completing initial or upgrade training as specified in 14 CFR 121.434(c)(1)(ii). We respectfully request that the FAA process this Exemption immediately.

Section of the FAR Affected.

The applicable Federal Aviation Regulation 121.434 (c)(1)(ii) concerning "Operating Experience, Operating Cycles and Consolidation of Knowledge and Skills" states:

> In addition, if a qualifying Pilot in Command is completing initial or upgrade training specified in 14 CFR 121.434, be observed in the performance of prescribed duties by an FAA Inspector during at least one flight leg which includes a takeoff and landing.

Background.

The original intent of 14 CFR 121.434 (c)(1)(ii) was to validate the training a pilot received in a visual (Level A) simulator. Since that rule was adopted, improvements in technology have provided the aviation industry decades of experience in flight simulation. 14 CFR part 121 Airlines have successfully trained thousands of pilots using highly sophisticated flight simulation equipment which has made the current rule relatively obsolete in its current format. Notwithstanding the above, the FAA has the authority to observe any pilot at any time and frequently exercises this authority.

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In the current climate, as the Airline Industry recovers from the global pandemic, Air Carriers, in addition to experiencing an increased level of retirements, are continuing to hire additional pilots. This has created the need to qualify new PICs. This in turn requires the scheduling of an FAA Inspector to observe a flight leg. The telecommuting, due to the pandemic along with reduction of labor resources at the Certificate Management Offices have significantly reduced the timely availability of Inspectors while the volume of training has increased dramatically. Therefore, the ability to provide a resource to complete the number of required inspections has been unnecessarily difficult.

The economic impact to the airline can be significant as well when an FAA Inspector is not available. The delay of completing PIC qualification makes the pilot unavailable to the airline for normal operations. Additionally, the FAA loses the labor resource of an Inspector for 1-2 days when provide an evaluation on a line flight. With CMO staffing reduced this requirement further impedes their progress on other matters. By allowing a company Check Pilot who is highly qualified on the aircraft at issue, and approved by the FAA for that duty, to complete the observation a greater level of scrutiny and thoroughness is provided for the qualifying Pilot.

The applicable Regulations and Relief Sought.

2 WAA seeks exemption from 14 CFR 121.434 (c)(1)(ii) "Operating Experience, Operating Cycles, and Consolidation of Knowledge and Skills" in those circumstances when an FAA Inspector is unavailable to observe a qualifying PIC during any of the scheduled Operating Experience (OE) flights to include international flights when appropriate.

Granting this Exemption Would be in the Public Interest.

Granting this exemption would:

1) Allow the FAA greater flexibility and better use of its Inspectors by focusing on higher priority safety functions.
2) Allow for the use of highly qualified pilots immediately after completing operating experience.
3) Allow significantly increased use of qualified pilots and improve 2WAA's ability to provide dependable on time air service to the public.
4) Reduce the unnecessary cost of wages and lost productivity for those pilots awaiting FAA observation.

Granting the Exemption Would Not Adversely Affect Safety.

Safety will not be Adversely Affected because:

1) By approving this petition for exemption, the FAA retains the right to observe any pilot at any time.
2) The company Check Pilot would be used only to fulfill the requirement of 14 CFR 121.434 (c)(1)(ii) when an FAA Inspector is not available.
3) The authorized Check Pilot will be highly trained and experienced in the particular airplane type and will be approved by the FAA.

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A Summary of this Petition that the FAA Could Publish in the Federal Register

Petitioner:	Caribbean Sun Airlines dba World Atlantic Airlines
Affected Regulations:	14 CFR 121.434 (c)(1)(ii) "Operating Experience, Operating Cycles, and Consolidation of Knowledge and Skills"
Summary of Relief Sought:	Caribbean Sun Airlines dba World Atlantic Airlines petitions for an Exemption from FAR 121.434 (c)(1)(ii) of Title 14, Code of Federal Regulations. The Exemption would allow Caribbean Sun Airlines dba World Atlantic Airlines to substitute a qualified and authorized Check Pilot or Aircrew Proficiency Designee (APD) in place of an FAA Inspector to observe a qualifying Pilot in Command (PIC) while the PIC is performing prescribed duties during at least one flight leg that includes a takeoff and a landing. Granting this Exemption is in the public interest as it maintains an equivalent level of safety.

Conclusion:

For the foregoing reasons, we respectfully request an Exemption from the requirements of FAR 121.434 (c)(1)(ii) "Operating Experience, Operating Cycles, and Consolidation of Knowledge and Skills".

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