

But this brings us to the proposition that at this point the Post Office Department, with the help of the FAA, is imposing a higher level of safety regulation on air-taxi operators carrying *mail* than the Government imposes on the same, or other, air-taxi operators who are carrying *passengers* for hire.

Three million passengers carried for hire by *scheduled* air-taxi operators in 1967 is not only a respectable number, involving a dollar volume many times that of the \$3,500,000 Post Office expenditure during the same year, but of much more significance from the standpoint of our present discussion, has involved a death and injury toll which cannot be viewed with anything approaching equanimity.

Preliminary figures indicate that there were some 84 deaths in air-taxi operations in 1967, of which 61 were passengers and 23 were crew. Figures for 1966 indicate a passenger fatality in air-taxi operations of 32, about one-half the level of 1967.

The area we are talking about is so new and so rapidly changing that comparative statistics are not worth much. However, the 1967 toll in absolute numbers is of sufficient magnitude to justify concern and affirmative action.

This rapid growth is being encouraged by the Federal Government, both by expanded authority through the Civil Aeronautics Board and the expanding contract operations of the Post Office Department. Then, too, the contracts between certificated carriers and air-taxi operators, as well as interline agreements between the two, would indicate a growing belief by at least some certificated airlines that the air-taxi operator fulfills a need. All in all, it can safely be assumed that the expansion is desirable and should be both encouraged and helped.

It is of concern to us that this record rate of growth, however desirable it may be, is being accompanied by a preoccupation with economic growth and very little, if any, attention is being paid to the safety obligation imposed by the equally rapid change in the role of this class of carrier. It seems clear that we cannot wait six months to a year for the evolution of a more modern regulatory scheme through the upgrading of Part 135.

In recent months, as the FAA has observed appreciable laxity in operating techniques of certificated carriers, it has acted promptly and sent teams in to review practices and to force an upgrading of them. We are of the view that the technique could be used in the area under discussion, although admittedly the *assignment* would be radically different, as will be developed later.

In this connection, it might be observed that air-taxi operators, including scheduled air-taxi operators, are conceived of organizationally within the FAA as being essentially a part of general aviation. This was once true and may still be true for the bulk of air-taxi operators, but it is by no means true for scheduled air-taxi operators or those under contract with the Post Office Department. This would suggest that not only should these carriers be classified as air carriers, but should be treated as such both within the structure of FAA and, in the longer pull, from the standpoint of safety requirements.

Another analogy of possible use in FAA consideration of this problem is its Project 85 which, as recently as in September, 1967, was set up on a test basis to encourage accident prevention in general aviation. The essence of this proposal, as we read it, is to upgrade the operations involved not by surveillance but by helping and by teaching. It is suggested that if Project 85 were narrowed down so as initially to make its principles specifically (and solely) applicable to scheduled air-taxi operators and air-taxi operators under contract to the Post Office Department, the possibility for success of the venture would be substantially enhanced. Experience with this more limited group could provide valuable information as a prelude to expansion to other general aviation areas later, as resources permit.

It is also suggested that personnel presently assigned as air carrier inspectors (whose job it is, basically, to monitor highly sophisticated and, it can be assumed, highly effective operations related to safety) could effectively be utilized in implementing such a program. Certainly, 165 scheduled air-taxi operators and 35 or more air-taxi operators under contract with the Post Office Department (most of whom are within the 165) would be a manageable number for intensive effort, where 90,000 members of the general aviation fraternity might not be.

Summing all this up, the Board is of the view that concerted and speedy action by both industry and government is required to adequately cope with the situation described. A suggested program follows: