

more active air taxi operators through operations specifications. Similar, and more stringent operations specifications, which include appropriate sections of Federal Aviation Regulations, Part 121, have been applied to air taxi operators who operate segments of certificated air carriers' routes. It is our opinion that these air taxi operators have affirmative references to safety practices through their operations specifications despite the lack of specific references in their contractual agreements with carriers.

In recent years, we have sent special teams to review operating practices of air taxi operators when there was reason to believe that their operations were substandard. The procedures followed by these teams closely parallel those used when conducting special inspections on certificated air carriers holding Civil Aeronautics Board authority. Additionally, at least one region is applying the Systems Worthiness Analysis Program (SWAP) to some of the larger air taxi operators on a test basis. If this proves practical, we will institute it on a national basis.

I have noted your suggestion that we consider the use of personnel assigned to our Project 85. This is a test program implemented in two regions with a limited number of personnel. We do not feel it would be wise to divert the personnel in this program.

Your suggestion that we use air carrier inspectors to conduct surveillance of scheduled air taxi operators is one that we have considered in the past. As a matter of fact, our field air carrier people have participated in developing standards and requirements for the operations specifications of air taxi operators. Additionally, we have considered transferring the responsibility for policy guidance of air taxi operations from our General Aviation Operations Branch in Flight Standards Service to the Air Carrier Operations Branch. The reason we have not done this is primarily because of personnel shortages and ceiling limitations under which we currently are operating. This is not to say that our Air Carrier Operations Branch does not involve itself with problems relating to air taxi operations. It does, as the need arises.

With regard to your suggested industry programs, I believe we may be considerably further down the road than many people realize. For example, the National Air Taxi Conference (NATC), with the encouragement and participation of FAA, held an Air Taxi Seminar last November in West Palm Beach. Approximately one hundred persons, some from as far away as Massachusetts and California attended the one-day session which covered management practices, operating methods, regulations and related subjects. Three more seminars, sponsored by NATC are scheduled for this spring and early summer.

Also, it's worth noting that individual air carriers have made space available in their own training and management programs for air taxi operators. A number of major air carriers have participated in the programs presented at the NATC annual conventions. Recently we discussed with the Air Transport Association the possibility of participating in an industry program similar to that which you suggest. Their initial response was favorable and, in light of your suggestion, we will be pursuing it further.

Insofar as government action is concerned, we are well along with a program addressed to the scheduled air taxi operators, including not only those who carry mail, but also those who hold interline agreements or conduct regular or frequent "on demand" operations. In February of this year we asked our regions to place special emphasis on the surveillance of air taxi operators falling in any of these categories. As I mentioned earlier, many of our field offices already have issued operations specifications based on the local or regional operating conditions and environments. These operations specifications include such items as prescribed training programs, pilot-in-command requirements, proficiency checks and flight time limitations equal to or more restrictive than those imposed by the Post Office.

We agree that effort should be made to advise and counsel these operators in how better to perform common carriage operations, with emphasis on safety. Regrettably, our manpower situation does not permit us to devote as much effort to such a program as we would like. However, we shall continue working with AOA, NATC and other groups at seminars, annual conventions and wherever else we believe we can help them to help themselves make their operations safer.

We agree that the safety supervision of air taxi operators who engage primarily in air transportation (as opposed to those who hold an air taxi certificate as an adjunct to another primary aviation interest such as a flying school or fixed-base operation) should be air carrier oriented. Unfortunately, most air taxi operations are not located in the immediate vicinity of our air carrier offices. As a matter of