

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 6 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:

I. BY THE INDUSTRY

A. Organized groups of scheduled air-taxi operators are urged to devote their energies to the safety of their operations to an extent more reasonably related to the amount presently being expended for the enhancement of their economic opportunities. For example, it would not seem either beyond the capabilities of these organizations or adverse to the intelligent self-interest of their members were they to institute programs devised to give expert guidance to operators in setting up operating rules and establishing desirable operating practices in areas involving safety (a large portion of accidents in this field are attributable to deficiencies in operations; that is, inadequate maintenance, inadequate training, and so forth).

B. Scheduled airlines are urged to take affirmative action commensurate with their responsibility for the safety of passengers being carried by scheduled air-taxi operators pursuant to interline agreements or specific contracts for the operation of route segments. Here, if the carriers are unwilling, for whatever reason, to assume affirmative responsibility for safe operations of air-taxi operators with whom they have either interline agreements or specific contracts to operate route segments, serious consideration should be given to having the CAB condition its approval of any such contractual arrangements on the existence of contractual undertakings by each air-taxi operator to comply with a set of safety rules comparable or at least equal to the then contractual arrangements between the Post Office and its airmail carriers.