

WRITTEN SUBMISSION OF
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL
TO THE
SUBCOMMITTEE ON AVIATION
COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE
UNITED STATES HOUSE OF REPRESENTATIVES
WASHINGTON, DC

MAY 13, 2009

“THE ECONOMIC VIABILITY OF THE CIVIL RESERVE AIR FLEET
(CRAF) PROGRAM”

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The following statement relating to Civil Reserve Air Fleet (CRAF) operations is submitted on behalf of the 54,000 professional pilots who fly for 36 airlines and are represented by the Air Line Pilots Association (ALPA).

Our initial comment is that the people who planned and developed the CRAF concept should be commended for their foresight and ability to visualize potential problems. From the line pilot’s vantage point, the overall effort went amazingly well considering the scope of the action and the fact that Desert Shield was the first deployment of U.S. Forces that required CRAF Stage I and II. All told, the CRAF carriers flew 5,188 missions from the US and Europe to the Arabian Peninsula. The CRAF accounted for 21% of the missions, 64% of the passengers, and 27% of the cargo during deployment. During the redeployment, CRAF carriers carried 84% of the passengers and 40% of the cargo returning to the US.¹

The second activation of the CRAF was post-9/11 during the lead-up to Operation Iraqi Freedom. On February 8, 2003, the USTC Commander General John W. Handy called CRAF Stage I. At the time of activation, the Stage I fleet consisted of 31 wide-body cargo aircraft and 47 passenger aircraft from 22 various airlines. Only the passenger aircraft were activated. These aircraft, along with the CRAF volunteers already operating missions, were needed to close the forces necessary for the beginning of hostilities. From February 8 through June 2, CRAF carriers flew more than 1,625 missions, moving 254,143 troops around the world. The majority of those missions were to the Middle East²

This does not mean, however, that some problem areas do not continue to exist or that operational improvements are not necessary. Any initiative of this magnitude will surface requirements for change in both procedures and operational effectiveness. These must be evaluated on an individual basis and revised when needed.

¹ CRAF Study report Air Mobility Command, July 30, 2008. **Air Force Technical and Analytical Support (AFTAS)**

² CRAF Study report Air Mobility Command, July 30, 2008. **Air Force Technical and Analytical Support (AFTAS)**

As in the activation during Desert Shield and Desert Storm, the activation for Operation Iraqi Freedom (OIF) was successful but not without issues. During OIF, the preponderance of issues were operational delays at en route bases, refueling and offloading, and delays due to the non-receipt of diplomatic clearances. Carriers have requested additional involvement in pre-activation planning to work these issues. The main issue was the Tanker Airlift Control Center's (TACC's) ability to rapidly incorporate the added capability of activation, in this case 47 passenger aircraft.

Shortly after being advised of the CRAF activation, ALPA established a communications link with its pilot group at each affected airline. The purpose of this link was to provide members immediate access to the association's principal officers and staff. This action enabled our members to obtain advice on problems they were encountering and at the same time, alerted our offices in the Washington area of issues that may need either coordination with, or clarification from other involved agencies and associations in the Washington area. This communications channel was used extensively during the initial phases of CRAF activation and continues to provide our members needed support.

Our specific comments and recommendations relating to CRAF operations are:

1. Flight Time/Duty Time: Previously, the U.S. Air Force Military Airlift Command (MAC) now the Air Mobility Command (AMC) requested the FAA to grant an exemption, on a case-by-case basis, to CRAF carriers to extend the flight and duty limitations of Federal Aviation Regulation (FAR) Part 121 to 150 hours in 30 days and 330 hours in 90 days. Under the regulations, (14 CFR Part 121, Subpart S), a pilot is limited to either 100 hours flying or in the case of a crew of two pilots and one additional airmen 120 hours duty aloft in 30 consecutive days or 300 hours duty aloft during any 90 consecutive days.

In response to the MAC request, the FAA has granted specific relief to air carriers that allow crewmembers to fly or to perform duty aloft for 150 hours in 30 consecutive days. This deviation extends only to those flight crewmembers that are scheduled to serve on all-cargo flights conducted under Department of Defense contract in support of the Middle East crisis. The FAA did not feel it prudent to permit relief from the 300 hour requirement.

We do not feel that present circumstances, or any future Stage I activation, warrants such relief, and are strongly opposed to the granting of this deviation from 14 CFR Part 121, Subpart S. The biological/physiological differences between senior airline pilots who fly CRAF aircraft and pilots operating military transports are obvious. Civil flight crews operating to these relaxed standards may become subject to extreme levels of fatigue, and safety margins will be reduced to compromising levels.

The question of the sufficiency of airlift support must be applied not only to Steady-state peacetime CRAF participation but also to the industry's ability to support a range of DoD contingency operations that entail a surge in airlift demand. The overall sufficiency of U.S. aircraft capacity to meet DoD mobilization needs is not in question. U.S. passenger airlines and cargo integrators have inventories of overseas capable aircraft that are quite large relative to DoD's mobilization targets. The CRAF fleet in its entirety has adequate resources of both personnel and equipment which should be used to prevent one operator from requiring their crewmembers to exceed generally accepted safe operating practices and flight time restrictions. An equal distribution of the workload among activated carriers is essential. Such factors as availability of personnel and equipment on all operators who have CRAF contract obligations should be reviewed before any request for exemption

to FAR requirements in considered. Under no circumstances should the inability of a few operators to live up to their CRAF obligations be the basis for granting exemptions to minimum safety standards established through the FARs.

2. Availability of Emergency Equipment: Military crews operating in an area of possible chemical/biological warfare are provided the protective equipment needed to reduce the life threatening hazards associated with these elements. This equipment generally includes a gas mask, a charcoal undergarment, rubber gloves and some type of foot protection to reduce aircraft contamination. CRAF crews using the same airports were not provided any protective gear. While the military authorities may be able to determine when an attack using such weapons is possible, nothing is sure in such an environment and therefore crews should have the same protective equipment available. We recommend that a type of "fly-away kit" be assembled and maintained by the Air Force and placed at strategic staging locations within the United States. The kits could then be issued to CRAF aircraft as they depart for their area of operations whenever it may be. To store such equipment earmarked for CRAF crews at locations in the hostile area may reduce or complicate access by CRAF crews. Such equipment should accompany them wherever they are activated and be available on a world-wide basis.

3. Hazardous Material Carriage: Another of our concerns surrounding the CRAF program deals with the carriage of hazardous materials. When CRAF was activated, DOT Exemption (DOT-E 9232) was issued and resulted in the transportation of hazardous materials via aircraft. Under normal circumstances, such hazardous materials are prohibited from being carried onboard civil aircraft. The DOT Exemption, however, authorizes the carriage of items which are normally carried by the surface mode, e.g., motor vehicle. The carriage of some such substances on civil aircraft increases the potential for a major incident or accident to exist, and poses a risk and exposure to the flightcrews to hazardous materials which are not normally encountered during airline operations.

Although a major incident has not occurred, we would like to see this exemption removed at the earliest practical time. This then would require the carriage of normally prohibited hazardous materials either by military aircraft or aircraft under military contract, and not CRAF aircraft.

4. Load Coordination/Ground Time: At the onset of CRAF activation, some problems relating to load coordination were experienced. Load availability and the amount to be transported were issues for discussion and resulted in excessive ground time. This problem diminished as day-to-day experience was gained and does not appear to be a factor at this time.

5. Passenger Relief: We were advised that in some cases, troops that were aboard CRAF aircraft for extended periods of time were not permitted by local authorities at foreign refueling stops to depart the aircraft. In one case, local police kept a full load of troops on a B747 for approximately six hours while ground maintenance was being accomplished. Such a policy should be unacceptable and challenged by the State Department.

6. Ownership and Control: According to the U.S. Transportation Command, during a period of national mobilization CRAF could meet up to 90% of DOD's passenger and 35% of DOD's cargo requirements. Recognizing the critical nature of civil fleet support for U.S. national security needs, the Institute for Defense Analysis has put forth a series of incentive

and business practice recommendations to support an “assured supply model” for CRAF aircraft. ALPA believes that immediate and assured supply of civil aircraft in time of national challenge will best be guaranteed by carriers that are under the actual control of U.S. citizens. Accordingly, ALPA supports retaining or enhancing the laws that ensure that the ownership and control of U.S. air carriers eligible to participate in CRAF remain in the hands of U.S. citizens.

As a final comment, we again would like to salute the Air Mobility Command for the dedication and professionalism they demonstrated in making this CRAF activation work. The CRAF program is in good shape, but there are a number of issues that should be addressed to insure the safety of the program and to improve effectiveness and efficiency. As we stated earlier, however, there are always lessons to be learned from a program of this magnitude. Therefore, we strongly encourage the Department of Defense to convene a meeting of all parties involved in the CRAF activation and operations, for the purpose of exchanging views on how the concept can be improved. ALPA would be most willing to participate in such a meeting. Our role in such a meeting would be to share the information we have gained through the communications network set up to monitor CRAF operations conducted by operators whose pilots are represented by ALPA.

Thank you for the opportunity to submit our views and experience with the CRAF program.