

Implementing safety-first solutions to the growing pilot shortage is a top priority for regional airlines.

- Regional airlines operate 42% of the flights. The majority (64%) of the nation's airports are too small to support air service by larger airlines -- regional airlines provide the only source of scheduled passenger air service here.
- A large percentage of airline pilots face mandatory retirement at age 65 (14 C.F.R. §121.383) in the coming years with various industry studies forecasting that 35% or more of the pilot workforce at the major airlines will retire by 2026. At the same time, there are fewer pilots in the pipeline.
- FAA's civil airmen data shows between 1990 and 2017 FAA issued 52% fewer total pilot certificates. The hireable pool of pilots declined by 21% -- a rate of 992 fewer pilots per month. Air Transport Pilot (ATP) Certificates decreased by 52% since 1990 despite a 2013 regulatory change newly requiring First Officers to hold them. FAA issued 53% fewer ATP certificates in 2016 than in 2017.
- Regional airlines are the career entry point for pilots and today's shortage has already caused the U.S. regional industry to contract -- notably, during a period of economic expansion. Communities have been hit hard. Since 2013, 252 airports lost at least 10%, 174 airports lost at least 20%, 107 airports lost at least 33%, 65 airports lost at least 50%, 26 airports lost at least 75% and 20 airports lost all of their service.
- The University of North Dakota forecasts a shortage of 3,000 pilots by 2020 and 14,000 pilots by 2026. At 10 pilots per regional aircraft, the shortage would mean 300 aircraft parked by 2020 and 1,400 aircraft parked by 2026. RAA member airlines' total fleet equals about 2,000 aircraft.
- In 2013, FAA implemented the new First Officer Qualifications (FOQ) Rule, which was prompted by Congress through the Airline Safety and FAA Extension Act of 2010 (P.L. 111-216 §217), requiring all part 121 pilots to hold an Air Transport Pilot Certificate (ATP), with a prerequisite of 1,500 hours, or a Restricted ATP (R-ATP), with portions of the prerequisite hours offset by structured training credit. The Rule increased the time and cost associated with pilot training.
- When the ATP certificate was formerly required for a Captain upgrade, pilots typically gained the prerequisite flight experience as first officers in commercial operations. Requiring 1,500 hours before career entry also changed the nature of the experience gained. Today, pilots gain the hours through unsupervised flying, typically outside of controlled airspace, in noncomplex aircraft, in fair weather, and with no additional training required during that time. This introduced a lapse of time between a pilot's foundational training and career entry, and performance in initial training has deteriorated as a result.
- Empirical data shows qualified pilots now have substantially higher flight time than before yet perform significantly worse in initial training. Flight time was inversely proportionate to pilots' success in training, with low time pilots doing significantly better than higher time pilots. If this seems counter-intuitive, consider that these candidates replaced some of the unsupervised flight hours described above with structured training.

- R-ATP pathways are underutilized, with only three approved at present despite their proven safety advantages and benefit to increasing the pilot supply.
- Regional pilot compensation has increased significantly and continues to climb (average entry level RAA First Officer total compensation is approximately \$60,000). Total compensation for first year, first officers climbed more than 150% between 2014 and 2016 but recruiting success fell from 79% in 2014 to 65% in 2016. Market responses cannot resolve the issue unless the underlying policy problem of career path accessibility, is addressed.
- Costs associated with accumulating flight time, combined with a pilot's education and training, can exceed \$200,000. This amounts greatly exceeds caps on student loans and is unattainable for most Americans. As a result, becoming a pilot is a financial impossibility for many.
- To help students manage the costs of pursuing a flight training degree, student loan standards and caps should be adjusted, loan forgiveness programs for aviators should be established, GI bill funding should be protected, and tax incentives for employer-based program repayment programs should be created.
- Under substantial FAA oversight, air carriers could develop – and pay for – additional R-ATP pathways to help reduce the financial burden of pilot training while enhancing safety over other qualification methods. These additional pathways could only be approved in instances where they enhance safety over other qualification methods.
- RAA agrees with the Flight Safety Foundation's March 2018 call to action: *“With the perspective of more than 70 years spent focused on aviation safety–related research, education and advocacy, Flight Safety Foundation believes that a pragmatic, data-driven approach to pilot training is essential to the continued improvement of the industry's safety performance. The industry needs to embrace, and national civil aviation authorities need to have the flexibility to adopt, competency- or evidence-based training methods that target real-world risk and ensure a progressive and satisfactory performance standard. It cannot be assumed that critical skills and knowledge will be obtained only through hours in the air.”*