

## Why we Oppose the “Enhanced Qualification Program” Amendment

### ***Naming an amendment that reduces safety an “Enhanced Qualification Program” is dangerous and disingenuous to the American flying public.***

In response to the Colgan Air Flight 3407 crash of 2009, Congress changed a host of laws in 2010 to improve safety, pilot qualifications, and training via the Airline Safety and Federal Aviation Administration Extension Act. The law brought sweeping reforms to Part 121 airline operations and resulted in the safest decade ever in U.S. commercial aviation history. Despite those safety successes, the airline industry and its associations attempted once again, via the FAA Reauthorization Act of 2018, to reduce the Airline Transport Pilot (ATP) Certificate standards. Congress and the FAA refused to compromise safety in 2018, and the public was rewarded with five more years of the safest commercial flying in the world. Once again, there is pressure to reduce these standards through the “Enhanced Qualification Program” (EQP) Amendment to the FAA Reauthorization Bills of 2023. We ***strongly*** oppose reducing the current standards that have kept this nation free from major accidents in the past 13 years.

#### **Issues within the EQP amendment:**

- TEQP would reduce by ***250 hours*** the actual flight experience requirements for a Restricted Air Transport Pilot (R-ATP) certificate after completion of an air carrier-developed training course.
- The EQP proposal does not provide the necessary details required to evaluate the training program. This ambiguity appears intentional, disingenuous, and dangerous.
- If this legislation is passed, a pilot could be flying passengers under Federal Aviation Regulation (FAR) Part 121 operations with as few as 500 hours of actual flight experience. This reduction in experience returns pilot qualifications back to unacceptable pre-2010 levels.
- EQP will not bring commercial airline flights back to rural communities. Regional and major airlines are choosing to fly more profitable routes and larger markets.
- EQP does not address the root cause of the barriers to entry for additional pilot production, which are cost, access, and pay for aspiring future pilots.
- EQP does not address the growing demand for pilots, as most FAR Guidance in Part 141 (which governs Flight Schools) and Part 61 (which governs Pilot Certification) depends on flight training students transitioning to instructor roles within their flight schools to achieve the total number of hours required for certification. Introducing shortcuts to the R-ATP will likely reduce the number of instructors available to train students, which would actually slow the training pipeline.
- EQP does not address the FAA’s regulatory backlog. This amendment will add additional strains on an already overly stretched regulatory body.
- The FAA already rejected outright a similar proposal by Republic Airways for its Lift Academy – an EQP training program – due to safety deficiencies. In its decision, the FAA declared that “the relief requested is not in the public interest and would adversely affect safety.”
- The Airline Safety and Federal Aviation Administration Extension Act of 2010 ***already gives the FAA discretion*** to allow specific academic training courses to be credited toward the minimum 1,500 flight hours, provided such courses would enhance safety more than requiring the pilot to comply fully with the flight hour requirement. The FAA already has the discretion to reduce these hours but has denied carriers this request.

To add insult to injury, the authors have incorrectly named this amendment “Enhanced Pilot Qualifications.” This false equivalence is not only dangerous; it could ultimately become deadly. Safety must remain the highest priority and should never be compromised. The safest component in any commercial airline operation is a **well-trained, experienced, and professional pilot**.

The Allied Pilots Association supports reducing the barriers to entry for aspiring pilots. However, EQP will not meet that aim. Therefore, we vehemently oppose EQP and any amendment that lowers standards and compromises safety.

**For questions or additional information please email [GAC-Chairman@alliedpilots.org](mailto:GAC-Chairman@alliedpilots.org)**