

## MU-2 training changes ahead

by Matt Thurber

The FAA received a fair number of comprehensive comments during the 30-day comment period for the proposed special regulations (SFAR) that will mandate type-specific training in the Mitsubishi MU-2. The comment period ended October 30, and 72 comments reside in the agency's docket. Although commercial MU-2 operators have already had to comply with the new MU-2 training program (a point that was reemphasized in FAA Notice N8000.348, effective Dec. 29, 2006), Part 91 operators won't have to comply until 180 days after the SFAR becomes final.

Most of the comments came from MU-2 operators, including many companies with MU-2 fleets. One universal question was why the MU-2 needs a special training regulation when airplane types with worse safety records aren't being singled out the way the MU-2 is.

The FAA has never commented on why the MU-2 is getting training SFAR attention when aircraft that crash at a higher rate are not, but two letters from congressman Tom Tancredo (R-Colo.) might have put some political pressure on the agency. The first letter asked FAA Administrator Marion Blakey to ground the MU-2 and the second, to President Bush, requested the immediate replacement of Blakey and NTSB chairman Mark Rosenker.

Mitsubishi has for many years asked the FAA to impose a type-rating requirement on the MU-2, but the new SFAR will be more stringent as it mandates recurrent training in addition to initial training. Type ratings don't carry a requirement for recurrent training.

When the SFAR takes effect, 180 days after that no one will be permitted to fly an MU-2 as an instructor, pilot-in-command or sole manipulator of the controls unless he has received a specific number of hours of initial/transition, requalification, recurrent and/or differences training per Mitsubishi's formal training program (part number YET 05301). The SFAR also requires pilots to obtain annual recurrent training in special emphasis items and pass a final phase check annually.

The FAA did note that pilots who receive training in accordance with the Mitsubishi program will receive credit for that training if it was done before the SFAR takes effect. The FAA issued a supplemental NPRM on January 3 that modifies pilot experience requirements. Any pilot with fewer than 50 hours of MU-2 time in the past two years would need initial/transition training, instead of zero hours. Pilots with 50 or more hours in the past 24 months qualify for requalification training instead of any amount of documented MU-2 time in the past 24 months. Pilots who have

not completed initial/transition, requalification or recurrent training in 12 or more months would have to complete requalification training.

Many commenters expressed concern that MU-2 training organizations won't have enough time to train everyone within the 180 days allowed for compliance. Because the FAA is allowing credit for training before the rule takes effect, that might not be a problem. MU-2 training organizations have been using the new program since the middle of last year. Many commenters, however, recommended changing the compliance time to one year instead of six months.

Like many commenters, Ron Northern of Northern Jet Sales of Murfreesboro, Tenn., has no problem with the training requirement. "I am happy to see that there is new training on the horizon and feel that [these] items, if incorporated, will improve the safety performance of a great aircraft. It is unfortunate we cannot give more pilots the 'judgment' skills they need to fly safely."

Northern also wondered why the FAA is specifying hours requirements instead of training to proficiency.

Of more concern, he added, is that pilots will be training in the MU-2 and flying dangerous maneuvers such as single-engine missed approaches. "I am fully aware that on a perfect day, a perfectly flown [single-engine] missed approach can be performed successfully." But encouraging pilots to perform the maneuver in the airplane, he added, promotes the impression that safe single-engine missed approaches can be executed routinely.

MU-2 owner Alan Kozarsky, who has more than 350 hours in type, summarized a common opinion about the MU-2 and mandatory training: "Unfortunately, the SFAR-compliant checklist and SFAR-compliant program will not stop pilots from flying into thunderstorms, will not prevent CFIT accidents and likely will not stop pilots from overly aggressive low-level maneuvering under stressful conditions. It will not teach judgment."

The requirement for a functioning autopilot isn't popular. Richard Schwartz, an MU-2 pilot since 1983, doesn't understand why the SFAR requires a working autopilot but makes no mention of the pilot having to use it.

Former FAA safety inspector John Keller, who has led MU-2 accident investigation teams, recommends that two pilots should be allowed in cases where the autopilot is not working. Keller also warns that the biennial flight review in the MU-2 should not cover pilots who fly other airplane types because "habits learned and practiced on the MU-2B

may have a detrimental effect on the handling of abnormal or emergency conditions on one of the other multiengine airplanes."

David Slivka, president of Anaconda Aviation and the MU-2 Aircraft Owners and Pilots Association, had more to say about the autopilot issue. "VFR operations should be permitted when an autopilot is inoperative," he wrote. "IFR above FL180 should be permitted in VFR conditions with an autopilot inoperative to provide for the greatest safety level available to the MU-2's capabilities. The MU-2 can overfly a lot of dangerous weather and terrain features by allowing it to operate in the flight levels and thus increase safety."

More important, Slivka wrote, is the problem of dwindling parts stocks for fixing the MU-2's Bendix M4 autopilot. "Reports indicate that the inventory of replacement parts such as overhauled servos (including clutches), computer boards and other components is in short supply or may not be available. Honeywell is not supporting the M4 autopilot to any meaningful degree as evidenced by the closure of its Fort Lauderdale overhaul/repair facility. The consequences of requiring a functioning autopilot dramatically outweigh the benefits; the requirement is economically unjustifiable and the proposal should be eliminated from the SFAR."

The MU-2 owners association's comments included this about sole manipulation of the controls: "The SFAR must be modified to permit manipulation of the controls during training. Since training in many cases includes becoming qualified, such necessary training would be impossible. The proposal begs the question of how a pilot would be able to get necessary initial or re-qualification training as stipulated elsewhere in the proposed SFAR."

Many commenters wanted to know how to handle a maintenance test flight on which technicians might have to manipulate the controls or a sales demo flight to a pilot without MU-2 experience.

Richard Janitell, an owner with 2,400 hours in MU-2s, wrote, "The cost of complying with all of the past restrictions and changes has been financially devastating. Now if all of the new proposed rules and training restrictions are adopted, I will have to sell my aircraft."

Other aviation associations weighed in on the MU-2 training SFAR. NBAA commented, "The FAA should consider allowing operation of the airplane with an inoperative autopilot for a short period of time. Allowing operators time to schedule autopilot repairs at approved facilities while continuing to operate the airplane for a short period of time would reduce the total burden proposed for operators of MU-2B airplanes." The NBAA also suggested a longer compliance time to allow operators "a realistic opportunity to comply with these requirements." □



Many commenters pointed out that no amount of training requirements will improve pilots' judgment.

### SFAR Requirements:

The new rule includes the following changes for operators:

- **Instructors**—must have logged 2,000 hours total, 800 PIC multiengine, 300 PIC MU-2, 50 MU-2 in the past 12 months.
- **Designated pilot examiners/check airmen**—100 hours in type and meet SFAR training and currency.
- **Landing currency**—all MU-2 pilots must perform 90-day landings in an MU-2.
- **Biennial flight review**—all MU-2 pilots must complete in an MU-2.
- **Operating requirements**—no single-pilot IFR or night VFR without operating autopilot; current AFM and FAA-approved Mitsubishi checklist available and accessible during flight.