

Amendment to Supporting Statement for Paperwork Reduction Act Submission

Justification for Generic Survey Approval

Safety will always be the first priority of the Federal Aviation Administration (FAA). In order to achieve the desired outcome of zero fatalities resulting from runway collisions, the FAA must expand its efforts to identify and respond to risks on the runway. While we have been analyzing runway incursion trends, some of the runway safety metrics are reaching low levels—for example, there were zero Category A incursions between two commercial jets the past two fiscal years—and we need new ways to measure the impact of runway safety initiatives. The lack of specific feedback on safety initiatives from the people for whom they were designed to support is not acceptable. We need the ability to gather feedback to identify risks, track progress, and implement proactive solutions.

The aviation environment is dynamic and constantly evolving. So are our customers' needs. However, in today's economic environment, it is essential to maximize cost/benefit ratios. Add to this complexity the fact that the relative proportions of runway incursion error types (that is, operational errors/deviations, pilot deviations, and vehicle/pedestrian deviations) have remained stable for the last four years. We not only need to decrease the proportions as the volume of air traffic is predicted to increase, we need to demonstrate cause and effect. Predicting today what educational products might be useful in two to three years so that we can develop surveys for approval now is likely to be a waste of resources.

Furthermore, the people who operate in the National Airspace System (NAS) are diverse (for example, air traffic controllers, pilots, and vehicle drivers). These customer groups require different safety products and would therefore require the development of unique, product-specific surveys to generate useful feedback. Also, aviation groups that would collaborate with us on initiatives, such as the Aircraft Owners and Pilots Association (AOPA) and the Air Line Pilots' Association (ALPA), would not apply resources to work on a product or survey that we are speculating will be constructive with the potential of never being distributed.

Finally, while runway safety training may seem an obvious course to teach today, this type of training is a relatively new concept and was not highlighted in the training curricula of previous decades. There is no question that human error is a certainty. What is questionable is what type of communication and coordination will help our customers (for example, commercial pilots, general aviation pilots, airline transport pilots, foreign pilots, student pilots, certified flight instructors, vehicle drivers, tug and tow operators, airport personnel) avoid making the errors that lead to runway incursions. We need to examine how much they know about ground operations. That knowledge will help us identify new elements of risk. It is our intent to positively influence our customers in runway safety knowledge, awareness, and execution. Therefore, we also need to clarify what motivates them to change or improve their behavior. This is the most effective way to backfill the training void, and feedback will help us to apply the right interventions.

Realistically, we know that once we determine a behavior that needs to be changed, and we establish and test our baseline, the results may disprove our findings. A new performance improvement concept would have to be developed and tested, which may lead our work down a different path than originally planned. While forecasting is useful, we do not believe that this strategy should be used when generating customer satisfaction surveys. To further reduce runway safety risk, the FAA needs to develop runway safety management strategies—and corresponding assessment surveys—based on real-time operational performance.

We are committed to preventing loss of life and aircraft collisions on the nation's runways. Historical collision trending indicates time is of the essence. Correctly focused efforts are crucial to timely success. Therefore, we request generic survey approval to forward this work in the most expeditious and cost-effective manner.