Role Recognition

BY WAYNE ROSENKRANS

U.S. operators conducting commuter and on-demand operations under Part 135 of U.S. Federal Aviation Regulations (FARs) in spring 2008 received guidance on notifying passengers about the unique role and limitations of cabin service employees/contractors not trained as flight attendants. In the context of a chartered Bombardier Challenger 600 takeoff overrun accident at Teterboro (New Jersey, U.S.; ASW, 3/07, p. 30, and ASW, 10/07, p. 38) — in which passengers assumed that a cabin aide, a customer service representative provided by the operator, was qualified to lead the evacuation — flight crews have been advised to update passenger safety briefings in line with their “statutory duty to provide service with the highest possible degree of safety in the public interest.”

Specifically, they are responsible for “clearly identifying to passengers those crewmembers who are safety-qualified and those who are not” and “accomplishing all functions relating to passenger safety when no safety-qualified flight attendant is on board,” said the U.S. Federal Aviation Administration (FAA). “Operators should ensure that passengers are aware that non-safety personnel are not trained or qualified to act in a safety-related capacity,” the FAA said.

If no flight attendant is carried, the flight crew must clarify during the required safety briefing of passengers and cabin aide(s) that they — not cabin aides — will perform all safety functions during normal flight operations and in case of emergency. The guidance was aimed at directors of operations, chief pilots, trainers, flight attendants, pilots and anyone employed to provide cabin services during Part 135 operations. These personnel “should insist that operating manuals, training programs and operational control procedures ensure that no ambiguity exists during Part 135 operations” about the safety qualifications of people who interact with passengers anytime during a flight.

“U.S. air carriers periodically use persons in the cabins of [their] aircraft for the purpose of conducting certain passenger service activities such as serving beverages, conducting customer relations or acting as translators,” the FAA said. “These persons are not assigned to flights to perform safety duties, and can be considered ‘non-safety personnel.’” A cabin aide generally is not trained or qualified to perform cabin safety duties and is not equivalent to an airline flight attendant.

The FARs do not prohibit either commuter/on-demand operators or airlines operating under Part 121 from assigning non-safety personnel to flights. Among the FAA’s safety concerns, however, is the possibility that such non-safety personnel — if not properly instructed by the operator — might interfere with flight attendants or other crewmembers. “Additionally, passengers could mistakenly consider [one of] these persons as a crewmember if not advised otherwise,” the FAA said.

Operators using cabin aides for operations under an air carrier certificate will be expected to limit each cabin aide’s scope of in-flight activities to passenger service. “They are a different type of cabin personnel and are not … responsible for cabin safety,” the FAA said.

Another safety implication of this status is that pilots and flight attendants must treat cabin aides as passengers even if the operator has designated them as crewmembers. “[Cabin aides]
must receive a pre-takeoff briefing, they must be seated in a passenger seat for movement on the surface, takeoff and landing, and they must stow their carry-on baggage,” the FAA said, citing examples of the expected practices. “They must also comply with the seat belt requirements and crewmember instructions. They may not conduct any activities during movement on the surface.”

If an operator designates cabin aides as crewmembers on flights, the cabin aide’s duties and responsibilities must be included in the air carrier’s general operations manual, the FAA said. Training for this crewmember also should be specified in this manual, a practice that addresses the problem of cabin aides being unaware that their training and qualifications generally are not equivalent to the safety training of flight attendants.

“These individuals should receive enough instruction so that they know what activities they may perform and equipment they may or may not operate so as not to interfere with flight attendants or other crewmembers,” the FAA said. “If they operate cabin safety equipment, they must carry applicable parts of the operations manual, which should provide enough information to ensure that they understand their duties and procedures [to prevent interference].”

The Teterboro accident report cited problems generated by the cabin aide’s unfamiliarity with emergency door operation and related procedures. The FAA’s response provides specific examples of what a cabin aide should not be expected to do, and how operators should influence the expectations of passengers when a cabin aide is aboard the aircraft.

“The activities assigned to these individuals should be clearly distinguishable to passengers from the duties assigned to other crewmembers,” the FAA said. “They should not be permitted to operate any equipment or systems for which specific training is required by [the FARs] (e.g., electrical galley equipment, heating and ventilation controls for the cabin, and the public address system, except to perform language translator duties for passenger briefings). Additionally, these persons should not be permitted to conduct any portion of a required safety briefing or demonstration (e.g., use of seat belts, location of the emergency exits, use of oxygen, etc.).”

Proactive communication can prevent confusion, overcome passengers’ erroneous assumptions and save time during an emergency. “Operators should employ methods to ensure that passengers do not mistake non-safety personnel as flight attendants or other crewmembers, and to identify crewmembers that are responsible for safety-related tasks,” the FAA said.

Notes


2. The FAA said, regarding this accident, that the flight crew and passengers had assumed incorrectly that an employee had been trained as a flight attendant — as required for airplanes seating 20 or more passengers — but actually this “person provided as a cabin aide to perform passenger-service functions was inadequately trained in safety-related functions, such as opening the cabin door to evacuate passengers. ... Such a person might be mistaken by passengers as a fully qualified flight attendant.”