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**T**here are no regulations in place with the FAA for Part 91 (Private Aircraft) or Part 135 Operations, (Charter / Air-Taxi) requiring an *emergency trained* flight attendant on any business aircraft with 19 or fewer seats. So, my question is, "Who made up that number" (Rhetorical question!) and why are 20 people's lives more important?

We all are aware of the Montrose, Colorado and Teterboro, New Jersey accidents where the "acting" flight attendants were not trained in corporate specific emergency equipment and evacuation procedures. In what industry where you have people's lives in your hands do you introduce into that environment an untrained / unskilled person? No where that I know of !

I think it is apparent by all that I have written or been interviewed where I stand as a professional on this topic. How can you *not* have an emergency procedures trained person in the back? I also cannot understand why the over wing exits on the Gulfstream 550 per the manufacturing and the FAA is different. The rule basically states that if you carry 10 or more people on the G-550 you must have a *non-flying* emergency egress procedures trained person in the cabin to evacuate the passengers and crew if need be. Again, the question I professionally pose is: " Why are 9 people's lives less valuable in the event of an aircraft emergency? The cost of emergency procedures training is a mere pittance in the overall operating cost of an aircraft. I am not talking about "Service Training" but emergency procedures training including evacuation training for private aircraft, not commercial equipment.

Lets talk costs! When the passengers are late, and the APU is running for two to three hours, that is probably the cost of an annual recurrent training for one crew member. When people order catering and then show up late and state that they chose to stop off and have dinner before departure, the APU was running costing a great deal of money, and the cost of the catering for 10 people for a nice 5 course meal is now useless at a ballpark cost of about \$1,800.00. Now add that figure to the cost of fuel with the APU running. Now the cost could total more than that of initial emergency training for a crew member. Think how often this scenario occurs? Trust me, quite often . . . .

Since SMS is basically a tool box for safety systems implementation and safety assurance, how can a flight department justify an untrained person in the back of the aircraft calling her or him a cabin server, or list them as a passenger so as to not have to pay for emergency procedures training and pay them a lesser daily rate than a professional cor-

porate flight attendant? I have 2 words, Teterboro and Montrose. This is baffling to me.

Many months ago I requested that an aviation insurer (ANYONE) contact me to discuss the fact that the risks and costs of injury and death are substantially mitigated with an emergency procedures trained third crew member and possibly lower the insurance rates of a flight department's equipment coverage, etc. when there is an egress trained person in the back. Not one person responded.

ICAO defines safety as the state in which the possibility of harm to persons or of property damage is reduced to, and maintained at or below, an acceptable level through a continuing process identification and safety risk management.

So, would you put a non-typed rated or non-trained pilot in the flight deck? No! Why would you put a person in the back of a multi-million dollar aircraft with NO training? And, most likely, the perception of the passengers is that this person is there to save their lives like they expect of airline flight attendants.

Dick Ebersol's son is dead and so is the "acting" flight attendant from Montrose, Colorado. I am sure that the price tag of the accident was high, much higher than the cost of an initial emergency training and recurrent training on a yearly basis. It is a shame that it all comes down to dollar \$ and that in my opinion with all of these new acronyms for safety "SMS" and "IS-BAO" is a smoke screen where it is applicable to flight attendant training and passenger safety!

I welcome anyone's input and thoughts, and in particular the aircraft insurance companies. I would also love to hear from Argus, Avsource, Wyvern and any other IS-BAO auditor on the subject of crew member and passenger emergency procedures training.

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