APA ALLIED PILOTS ASSOCIATION

Why We Oppose the "Let Experienced Pilots Fly Act of 2023"

Raising the retirement age would provide little to no benefit to overall workforce strength. It would worsen the existing training backlog and provide only limited productivity from 65+ pilots due to ICAO rules prohibiting these pilots from flying outside the United States. Disability rates also increase significantly for 65+ pilots.

Should the U.S. raise its mandatory retirement age, an airline pilot 65 or older would be restricted from any international flying due to the International Civil Aviation Organization (ICAO) mandate that pilots may not serve past their 65th birthday. As many pilots approaching retirement age are also the most senior, and the most senior pilots typically fly wide-body aircraft on international routes, this restriction would require retraining these pilots onto narrow-body aircraft. These additional training events would compound the existing training backlog, which resulted from mass early retirements during the COVID-19 pandemic and the subsequent hiring boom as demand returned. Note that the restriction on international flying even applies to Canada or Mexico, destinations largely served by narrow-body aircraft, further limiting age 65+ pilot productivity. Even if ICAO changed their age standard, that rule-making process would take several years, during which time the training backlog and hiring trends will have resolved the current, temporary U.S. pilot shortfall. Finally, as an additional productivity consideration, current pilot workforce trends indicate a sharp, linear increase in the rate of absences for medical reasons beginning at age 55.

Raising the retirement age would introduce additional risk to a system already under stress due to age-related cognitive decline and potential for incapacitation.

Cognitive performance declines throughout every person's life, negatively affecting reaction time, spatial orientation, and problem-solving ability. A mandatory retirement age in principle acts as a barrier to mitigate the risk that these symptoms of decline in pilots could become a threat to flight safety. While there is no inflection point in any of these metrics at age 65, the two years from 65 to 67 still represent an increase in risk for little return in pilot productivity. The European Union Aviation Safety Agency (EASA) recommended keeping the current retirement age because it found pilots older than 65 would create a burden due to additional required risk-mitigation measures and tests. Additionally, the risk of pilot incapacitation from an age-related condition such as heart attack and stroke also increases with age. Several recent incidents at airports around the country point to the stress on our commercial aviation sector and suggest that adding even marginal risk into our system would be unwise.

Current pilot flight time, duty time, and rest rules (FAR 117) are science-based for a pilot group with a maximum age of 65.

The flight time, duty time, and rest rules in Part 117 of the Federal Aviation Regulations – as with many aviation rules – are "written in blood," based on lessons learned from past fatal accidents. FAR 117 was written using multiple studies to determine safe maximum duty times with respect to likelihood of fatigue, none of which included data from pilots older than 65. Without further research toward updating FAR 117 rules to accommodate an increased retirement age, we would be "flying blind" and introducing added risk to the system. Additionally, according to the EASA, allowing pilots older than 65 years in multi-pilot commercial air transport (CAT) operations would require additional risk-mitigation measures such as specific tests to support the aeromedical decision on the individual applicant's fitness to fly.

Raising the retirement age would have little to no effect on air service to rural communities, which is driven primarily by economic factors.

While the current shortfall in pilot staffing no doubt plays a role in the reduction of service to some communities, the primary factor at play is economics, and the airlines themselves say so. "You can't afford to be flying people someplace where it costs you more to fly them than you're getting paid for it," Nick Calio, president and CEO of Airlines for America, said in September 2022 during a CBS News town hall. Relics of a non-viable business model, the 50-seater regional jets that have historically served the smallest communities are unpopular with passengers and airlines alike and are being permanently parked. Congress may look at expanding the Essential Air Service program to return service to some markets. However, pilot staffing cannot and will not drive the economic calculus employed in route planning. To wit, even if airlines had more pilots, they would likely use them to add capacity to their most profitable routes. Blaming the lack of air service to rural communities on a pilot shortage is misleading and harmful, as it distracts and deters small community leaders from addressing alternative access concepts.

For questions or additional information please email GAC-Chairman@alliedpilots.org