1. CAR 135.505 is intended to address safety risks associated with pilot experience. Do you think it is effective at doing this in its current form? Why or why not?

- **35%** YES
  - “It ensures time is spent between company pilots to standardize operations”

- **38%** PARTIALLY
  - “The intention of the rule is good, however the application is flawed”

- **23%** NO
  - “The rule is too generic to cover all Part 135 operations and does not accommodate the variety of pilots in this sector”

2. What problems, if any, do you face implementing the CAR 135.505 requirements in your organisation?

- **Problems 69%**
- **No problems 31%**

  - **COST**
  - **AVAILABILITY OF TIME, CONDITIONS OR SUPERVISING PILOT**
  - **PASSenger PERCEPTIONS**

  - “ONE SIZE DOES NOT FIT ALL”
3. How much does it cost your operation to meet the requirements of CAR 135.505 per pilot?

Average = $8,700

4. Do you require some pilots to do more than what is prescribed in Part 135 when determining their fitness for the pilot-in-command role? Why/why not?

- 66% say YES
  “The existing standards aren’t high enough for most pilots”

- 34% say NO
  “The pilot should be ready after completing the type rating, crew checks, and 135.505 consolidated time”

5. If you mentioned additional pilot-in-command training requirements in Question 4, are these specified in your training programme required under CAR 135.553?

- Yes 69%
- No 31%
6. In your experience, is time-on-type a good proxy for determining operating experience or competence? Why/why not?

24% YES
“The operating experience on-type is simply establishing a safe baseline of operating disciplines, knowledge of systems, and handling skills”

39% PARTIALLY
“Time-on-type is important for less experienced pilots, but becomes less important as the pilot gains experience”

36% NO
“Some pilots gain competency faster than others - time is subjective”

7. What are the different skills, experience and behaviours you think a competent pilot should demonstrate during their CAR 135.505 hours?

Personal skills and behaviours such as...
- honesty, integrity, humility, rationality, discipline, responsibility, enjoys flying

Aviation skills such as...
- systems knowledge, safety focus, weather appreciation, threat identification, technical knowledge, regulatory knowledge

Professional skills and behaviours such as...
- safety conscious, customer focused, problem solver, calm under pressure, conservative, critical thinker

8. How would you rate the importance of the skills, experience and behaviours you identified in Question 7?

Most said they are all "very important"
9. Do you have any comments on why you chose those ratings in Question 8?

"Most accidents are human error - decision quality is very important"

"One error could be fatal"

10. Do you have any other comments about CAR 135.505 not covered by the previous questions?

"If the pilot is given a good type rating, appropriate amount of supervised flying and continued supervision by senior people this would reduce the requirements of the current rule"

"Consistent auditing of the requirements by the CAA is very important"

"Leave the 135.505 requirements as they are currently"

"Companies pay lip service to this CAR and they need to understand that it is and can be a vital tool in setting the operational standard of a professional company"

"This Rule has not worked for Part 135 operations - it may be a good Rule for airline IFR operations. General aviation operators find mentoring and supervision deliver better safety outcomes"

The full summary of survey responses is available on the CAA website.