Federal Aviation Administration

National Part 139 Cert Alert

Date: 2/25/2020

To: All Title 14 CFR Part 139 Airport Operators

Subject: Required Training for Vehicle Operators Prior to Accessing the Movement Area

Point of Contact: Freddie James, AAS-300, 202-267-8792
Email: Freddie.James@faa.gov

1. Purpose. This CertAlert reiterates the importance of training all personnel with access to movement areas and clarifies the airport vehicle operator training requirements already identified in 14 Code of Federal Regulations (CFR) Part 139, Certification of Airports; Advisory Circular (AC) 150/5210-20, Ground Vehicle Operations to include Taxiing or Towing an Aircraft on Airports; and AC 00-65, Towbar and Towbarless Movement of Aircraft.

The Federal Aviation Administration (FAA) reminds Airport Operating Certificate (AOC) holders to ensure Aircraft Brake Ride Operators (Cockpit Observers), Tug Operators, and Taxi-Qualified Mechanics receive the required vehicle operator training before accessing the airport movement area.

Vehicle operator training for access to the movement area remains a “best practice” for non-certificated airport operators.

2. Background. A recent regional surveillance inspection of an airport’s driver training program revealed Aircraft Brake Ride Operators (Cockpit Observers), Tug Operators, and Taxi-Qualified Mechanics were not consistently receiving training prior to operating in the airport movement areas. Initial and annual recurrent training of any vehicle operator requiring access to the movement areas is mandatory at certificated airports in accordance with CFR Part 139.329. We stress the importance of following the existing guidance documents cited below to help ensure training consistency for Aircraft Brake Ride Operators (Cockpit Observers), Tug Operators, and Taxi-Qualified Mechanics across the National Airspace System:
a. **AC 150/5210-20.** Paragraph 1.1 states, “Airport operators are ultimately responsible for establishing procedures and policies for vehicle access and operation on the movement and safety areas of the airport. Aircraft can also act as vehicles. When an aircraft is not intended for flight, anyone (except pilots) taxiiing or towing an aircraft needs vehicle training to access the movement and safety areas of the airport”. **The airport operator is accountable for the training and actions of all airfield vehicle operators approved to operate on the airport.**

b. **AC 00-65.** Paragraph 7 outlines the procedures and guidelines for training Aircraft Brake Ride Operators (Cockpit Observers), Tug Operators, and Taxi-Qualified Mechanics. Specifically, “Flight deck/cockpit observer duties include looking outside the cockpit and warning the tow vehicle operator of possible safety issues.” In addition, the Aircraft Brake Ride Operator (Cockpit Observers) may be the primary person communicating with the ground operations (control tower and/or ramp control), so it is critical to ensure that individual is trained.

3. **Recommendations.** Airport operators should:
   a. Review their movement area access requirements to ensure training requirements are identified for Aircraft Brake Ride Operators (Cockpit Observers), Tug Operators, and Taxi-Qualified Mechanics;
   b. Ensure the training materials cover all the elements emphasized in this CertAlert; and
   c. Fully document training.

---

Anthony Butters, Acting Manager
Airport Safety and Operations Division, AAS-300

2/25/2020