

Loadmaster Certification Working Group  
(LCWG)  
Recommendation Report Briefing to the  
Aviation Rulemaking Advisory Committee

**Mark Phaneuf**  
Working Group Chair

June 21, 2018

# LCWG MEMBERS

- Mark Phaneuf, LCWG Chair – Air Line Pilots Association, International (ALPA)
- Martin McKinney, LCWG Vice Chair – United Parcel Service (UPS) Airlines
- Stephen Banks – National Cargo Group, Inc. d/b/a National Airlines
- Steve Brewer – Kalitta Air
- Richard Brose – FedEx
- Lawrence Fine – Atlas Air
- Erik Kaupa – Professional Loadmaster Association
- Peter Mejia – Northern Air Cargo
- Darrin Noe – The Boeing Co.
- Jeff Olver – Alaska Airlines, Inc.
- George Paul – National Air Carrier Association (NACA)
- Yvette Rose – Cargo Airline Association (CAA)

## FAA

- Stephen W. Grotta, FAA Aircraft Maintenance Division (AFS-300) Cargo Focus Team (CFT)
- Julia Greenway, FAA Office of Rulemaking (ARM)
- Jose Castedo, FAA Office of Aviation Policy and Plans (APO)
- Paul Greer, FAA Office of the Chief Counsel (AGC)

## ADVISORY and SUPPORT STAFF

Sandra L. Lamparello, PAI Consulting, Inc.

# SUMMARY OF TASKING

- Provide advice and recommendations to the ARAC on whether safety would be enhanced if persons engaged in the loading and supervision of the loading of **special cargo**, to include the preparation and accuracy of **special cargo load plans**, be certificated. If the Working Group recommends certification of these persons, it should also provide recommendations regarding which specific operations should require the use of these certificated persons. Additionally, it should also recommend appropriate knowledge, experience, and skill requirements for the issuance of the certificates and appropriate privileges and limitations.
- Determine the effect of its recommendations on impacted parties.
- Develop a report containing recommendations based upon its analysis and findings. The report should document both majority and dissenting positions on its recommendations and findings and the rationale for each position. Any disagreements should be documented, including the rationale for each position and the reasons for the disagreement.

# SCHEDULE

- Tasking Assigned – May 12, 2016

- TELCON Meetings:

- TELCON 1 – October 11, 2016
- TELCON 2 – December 13, 2016
- TELCON 3 – January 10, 2017
- TELCON 4 – March 14, 2017
- TELCON 5 – April 11, 2017
- TELCON 6 – May 1, 2017
- TELCON 7 – June 5 & 13, 2017
- TELCON 8 – July 11, 2017
- TELCON 9 – September 11, 2017
- TELCON 10 – October 10, 2017
- TELCON 11 – November 20, 2017
- TELCON 12 – December 12, 2017
- TELCON 13 – January 3, 2018
- TELCON 14 – February, 13, 2018
- TELCON 15 – March 6, 2018
- TELCON 16 – March 20, 2018

- FACE-TO-FACE Meetings:

- Meeting 1 – August 30-31, 2016
- Meeting 2 – November 9-10, 2016
- Meeting 3 – February 7-8, 2017
- Meeting 4 – May 9-10, 2017
- Meeting 5 – August 15-16, 2017
- Meeting 6 – October 24-25, 2017
- Meeting 7 – January 16-17, 2018
- Meeting 8 – April 9-10, 2018

# RECOMMENDATION

- By general consensus, the LCWG recommends the FAA require air carriers conducting special cargo operations under 14 CFR part 121 to have an FAA-Approved Special Cargo Program
- Special cargo is currently defined by FAA as: “cargo that requires special handling and securing/restraining procedures within the limitations specified in the Airplane Flight Manual (AFM) or Weight and Balance Manual (WBM) approved by the Type Certificate (TC) or Supplemental Type Certificate (STC).”
- The working group strongly feels the implementation of a comprehensive and approved program provides the best framework to enhance safety and allows the flexibility necessary to accommodate various air carrier’s operations.

# FAA-Approved Special Cargo Program

- Those intending to transport special cargo would submit a comprehensive Special Cargo Program to the FAA for approval
- This Program would:
  - Identify specific training required to ensure compliance with Airplane Flight Manuals (AFM) applicable to the design approval holder (DAH) limitations and Weight and Balance Manuals (WBM)
  - Set forth requirements for the knowledge, abilities, and skills required for the special cargo analysis function (SCAF) in support of a specific air carrier's special cargo operations

# FAA-Approved Special Cargo Program, CONT.

- The FAA would review and approve the Special Cargo Program using both the air carrier's principal operations inspector (POI) and principal maintenance inspector (PMI), with approval by one or the other, thus providing the agency with broader oversight and knowledge of the carrier's special cargo operations
- Continuous improvement and oversight of the air carrier by the FAA could be accomplished through the air carrier's Safety Management Systems (SMS) program.

# DISSENT

- The dissenting position preferred the certification of individuals be accomplished using the regulatory provisions under 14 CFR part 65, similar to the certification of Repairman, and creating a subpart G. This position states the Repairman Subpart G option “. . . creates a certification for personnel responsible for the loading, restraint, and documentation of special cargo loads on transport-category airplanes”
- The dissenting position believes a 14 CFR part 65 certification would provide for a standardized minimum level of skill, knowledge, and experience for air carrier employees and/or those contracted to the air carrier
- During face-to-face meetings, the group respectfully acknowledged and discussed the dissenting position



# RECOMMENDATION RATIONALE

- The FAA-Approved Special Cargo Program would cover a broader scope of individuals across air carrier's operations
- The program would ensure air carriers are providing general awareness for most individuals and function-specific training for individuals who would handle special cargo
- Contractors and ground handling companies which are common in the industry would also be covered under the program
- This option is based on an existing program model used to mitigate the risks associated with the transport of dangerous goods/hazardous materials and is a familiar framework for the FAA and air carriers

# Summary

- The LCWG believes, as outlined in the report, our recommendation for adoption of the FAA-Approved Special Cargo Program will enhance safety for the persons engaged in the loading and supervision of the loading of special cargo.
- It will improve the preparation and accuracy of special cargo load plans and provide both air carriers and the FAA with the flexibility to address a wide range of operations while enabling more effective FAA oversight.
- The LCWG also believes its recommendation best incorporates the elements of the safety management system (SMS) philosophy by providing air carriers with a more effective means to use ongoing training data to continually improve their programs.