

SUBMISSION OF ATP USA, INC.
TO THE
NATIONAL TRANSPORTATION SAFETY BOARD

ACCIDENT
MARCH 24, 2014
BRUNSWICK, GEORGIA
ERA14FA168

Submitted in accordance with 49 CFR 845.27, ATP USA, Inc., a designated Party to the National Transportation Safety Board (NTSB) investigation of the accident.

Parties to the investigation include the Federal Aviation Administration (FAA), ATP USA, Inc. (ATP), Lycoming, and Piper Aircraft. The intent of this submission is to highlight areas that ATP believes the NTSB should consider in its final report on this accident. ATP appreciates the opportunity to submit these comments.

AIRCRAFT INFORMATION

The right vacuum pump was installed on the aircraft on January 24, 2014, with a recorded Hobbs time of 2,225.8 hours and S/N 155135.

TEST AND RESEARCH

The right engine vacuum pump had accumulated 64.8 total hours since overhaul. Another pilot's maintenance report revealed that this vacuum pump was noted as inoperative and the accident pilots were notified. The flight was operated in accordance with FAR 91.213(d). No flight limitations existed, for the airplane, for an inoperative vacuum pump beyond those prescribed by applicable FARs and the Pilot's Operating Handbook.

ORGANIZATIONAL AND MANAGEMENT INFORMATION

At the time of the accident, the operator of the accident airplane, ATP USA, Inc. conducted flight training with 38 training centers located in 18 states, and operated a fleet of 266 aircraft. The fleet consisted of various airplanes, including 104 Piper PA-44 airplanes. The accident pilots were currently flying out of the Jacksonville, Florida, base. ATP also had six maintenance centers and utilized contract maintenance providers located within the United States, of which, one of those maintenance centers was located in Jacksonville, Florida. The corporate headquarters was also located in Jacksonville, Florida.

ADDITIONAL INFORMATION

Flight School Standard Operating Procedures

Standard operating procedures and limitations include:

All flights will be planned utilizing crew concept standard operating procedures and calls. The left-seat pilot is referred to as the Pilot Flying (PF); the right-seat pilot is referred to as the Pilot Monitoring (PM)...

...The PF will conduct each flight under FAR §91.3(a) and FAR §61.51(e)(1)(i) and will be listed as the pilot on the IFR flight plan, indicating that he or she is pilot in command.

...The PM will monitor the PF and perform duties required of the safety pilot as well as supporting duties for crew concept standards and calls. However, the PF will continue to have ultimate responsibility for the flight.

Both pilots in the accident aircraft were trained in and agreed to operate using the above procedures.

Piper Aircraft PA-44-180 Airplane Maintenance Manual

With regard to scheduled vacuum pump maintenance, Chapter 05-20-00 3.36, Note 7 of the Piper Aircraft PA-44-180 Airplane Maintenance Manual (P/N 761-664 Rev. April 15, 2012) directs that the vacuum pump be “Replace[d] or overhaul[ed] [...] at engine overhaul.”

At the time of the accident, the flight school and their pilots utilized CFR Part 91.205 to determine if an airplane may be operated with inoperative equipment.

FACTUAL REPORT FORM ADDITIONAL INFORMATION

On the Factual Report form, Air Carrier Operating Certificate is not applicable. ATP USA, Inc. does not operate as a Part 141 Pilot School.

Landing Gear Type: Retractable - Tricycle				
Amateur Built Acft? No	Number of Seats: 4	Certified Max Gross Wt. 4400 LBS	Number of Engines: 2	
Engine Type: Reciprocating	Engine Manufacturer: LYCOMING	Model/Series: O-360-E1A6D	Rated Power: 180 HP	
- Aircraft Inspection Information				
Type of Last Inspection 100 Hour	Date of Last Inspection 03/2014	Time Since Last Inspection 18.7 Hours	Airframe Total Time 6645.6 Hours	
- Emergency Locator Transmitter (ELT) Information				
ELT Installed?/Type Yes / C91-A	ELT Operated? No	ELT Aided in Locating Accident Site?		
Owner/Operator Information				
Registered Aircraft Owner ATP AIRCRAFT 2 LLC	Street Address			
	City WILMINGTON	State DE	Zip Code 198081645	
Operator of Aircraft ATP USA, Inc.	Street Address			
	City Atlanta	State GA	Zip Code 30336	
Operator Does Business As:		Operator Designator Code:		
- Type of U.S. Certificate(s) Held:				
Air Carrier Operating Certificate(s): Pilot School (141) Delete - ATP USA does not operate under a 141 Pilot School certificate				
Operating Certificate:		Operator Certificate:		
Regulation Flight Conducted Under: Part 91: General Aviation				
Type of Flight Operation Conducted: Instructional				
FACTUAL REPORT - AVIATION				
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