

No. 82-10 (Federal Register, 1982, Vol. 47, No. 131, pp. 29782-29785), to solicit comments and suggestions from the public to aid the FAA in deciding what action, including research, should be taken regarding the Age 60 rule. The ANPRM was withdrawn, however, because of a number of comments indicating continued need for the regulation.

A second study, "The Influence of Total Flight Time, Recent Flight Time and Age on Pilot Accident Rate" was conducted for the FAA by Richard Golaszewski of Acumenics Research and Technology (June 30, 1983). That report concluded that accident rates for experienced Class I and Class II pilots (primarily air transport and commercial pilots) increase sharply past the 60 year point. The study focused on the correlation between age and accident rates and did not discriminate between older pilots involved in accidents and those who were not.

The Golaszewski study utilized data from two sources: the FAA Medical History File (for flight hour exposure data), and the NTSB file of accident reports. A key assumption of the study is that the recent and total flight times reported in the two sources are equivalent. This assumption is untested; verification of this assumption would require database comparisons and linkages. There is an explicit disclaimer in the study that such verification was beyond the scope of the study.

Although both of these studies were aimed at questions surrounding pilot age and performance, neither one specifically and conclusively addresses the difficult issues involving specific linkages between age and performance. Furthermore, neither study addresses the contributing causes of accidents or relates causal factors to age-dependent factors. A consolidation of existing data sources could support analysis of the specific issue of the age 60 performance threshold. This would support the understanding of the relationship between accident rate and age with data that is not hampered with other confounding variables. It should be noted that this study is not intended to finally establish causal relationships between age and accident rates. The quality of the available data will not support such an investigation. However, reexamination and consolidation of the databases has potential to improve our understanding of important factors, as well as other variables which should be collected. Thus, the Contractor shall be expected to utilize improved statistical methodologies and address issues raised in prior studies.

A further application of the consolidated data would be to serve as the groundwork for the development of a methodology for assessing pilot performance based on factors other than (or in addition to) age. That is, a performance assessment approach that would quantify the physiological age of an individual (as opposed to chronological age) based on criteria directly related to the demands and requirements of the cockpit. The successful development of a reliable performance assessment methodology would open the door to the option of determining retirement age based on an individual, case-by-case basis. Finally, several forums on this subject have recommended initiation of a prospective study addressing the issue.