

Statement of Robin Wilkening, MD, MPH
In Support of Senate Bill 361
March 13, 2001

Mr. Chairman and distinguished members of the committee: Thank you for allowing me the honor of speaking. My name is Dr. Robin Wilkening. I am a physician specialist in Occupational Medicine, an aviation safety researcher, and a frequent flyer. And I am here today to tell you that the Age 60 Rule is age discrimination in commercial aviation.

You will hear over and over that the Age 60 Rule is a necessary safety standard. Don't be deceived! The truth is, if the issue was *really* safety we wouldn't be having this discussion because there wouldn't be an Age 60 Rule. Time and again over-60 pilots have been shown to be *as safe as* their younger colleagues. The Age 60 Rule has *never* really been about safety.

The Age 60 Rule's conception followed the unethical professional coupling of the CEO of American Airlines and the first Administrator of the FAA, resulting in an economic windfall for the airline and a sweet post-retirement job for the Administrator. (16, 17, 18, 19) Even then the FAA knew, and I quote: "it was not yet possible to establish a retirement age for civil airline pilots based on scientifically determined facts." (1) Let me put to rest the concerns that have been raised regarding the health and fitness of our most experienced and skilled pilots.

Historically there have been three hypotheses of interest:

1. Pilots over age 60 might experience incapacitation.
2. Pilots over age 60 might experience undetected cognitive decline.
3. Medical testing may not identify pilots over age 60 who might be at risk for adverse health events.

Incapacitation

Sudden incapacitation due to cardiovascular disease was the stated reason, though not the real reason, that the actual age of 60 was chosen. Forty years ago, when ALPA still championed the rights of *all* pilots to remain employed, former ALPA president Clarence Sayen challenged FAA Administrator Elwood Quesada to justify his hasty decision to enact the Rule. Quesada responded with 41 highly questionable articles culled from the medical archives of the 1950's, the majority of these having been published decades earlier. In addition to being astonishingly

outdated, these articles described characteristics of the general population and not of airline pilots. (20) They are *not* the “fundamental, indisputable principles of medical science” (30) that current ALPA president, Duane Woerth, would have you believe. The original justification for the Rule implied, incorrectly, that the health characteristics of the general population of white males in the United States applied also to the population of air carrier pilots. Wrong then and wrong now! Airline pilots are still healthier and live longer than their counterparts in the general population the world over. (3, 4, 7, 12, 13, 14, 22)

Moreover, concern over pilot incapacitation causing a crash is simply unjustified. IATA data and simulator data show that the risk of incapacitation due to cardiovascular disease is only 1 event in more than 20 million flight hours. The calculated probability of a crash occurring as a result of incapacitation is 1 event in every 8.3 billion flight hours, or, stated another way, 1 episode every 400 years. (8) Furthermore, it is well established that in-flight incapacitation is a far lesser threat to safety than are mishaps due to inexperienced pilot error. (11)

The truth is, 40 years of medical scrutiny show no justification for the Age 60 Rule based on the fear that an airline pilot will become incapacitated, regardless of age.

Cognitive Performance

The normal, healthy aging process is accompanied by decreases in cognitive function over time in all population groups, though rarely manifest prior to 70. (25, 26) Airline pilots consistently demonstrate superior task performance when compared to age-matched non-pilots. (27) High levels of education and training – characteristics of commercial aviators – significantly enhance the retention of mental abilities. (25) Airline pilots are selected for good health at the start of their careers and are subjected to comprehensive medical examinations every 6 months thereafter. Illnesses that might lead to cognitive decline are detected and corrected, or the pilot is removed from the work force. (9) They are the most monitored and health-conscious of all professionals. Moreover, all airline pilots undergo mandatory simulator time that tests every conceivable routine and emergent situation. They are under the constant scrutiny of other pilots, flight attendants, mechanics, loadmasters, gate personnel and air traffic controllers during daily flight operations. They are subject to the two-communication rule at all times. There is simply no chance that cognitive decline will occur unnoticed. The truth is, 40 years of medical scrutiny

show no justification for the Age 60 Rule based on the fear that an airline pilot will have undetected cognitive impairment, *regardless of age*.

Identification of Pilots at Risk for Adverse Health Events

ALPA wants you to believe that "medical science has not developed a regimen of reliable tests that can be administered effectively to identify those aging pilots who are, or will become, incapacitated, or whose performance will decline to an unacceptable level." (30) I am forced to reveal that Captain Woerth is either sadly *uninformed*, or seeks deliberately to *misinform*. The truth is, sophisticated and readily available testing programs have been used by the FAA for more than 20 years to determine airline pilot fitness for duty. In addition to the diagnostic value of these ever-improving tests, they are widely accepted to have *predictive* value as well. (2, 6, 21) Moreover, age simply does not affect the manner in which disease manifests itself diagnostically. (28) The claim that these tests - both medical and psychological - fail the day a pilot turns 60 is simply wrong! Airline pilots under age 60 who have been removed from duty for myocardial infarction, coronary artery bypass surgery, valvular disease, alcoholism (some even after relapse), drug abuse, brain injury, psychiatric illnesses, and a long list of other life-threatening maladies, are routinely returned to flying upon passing one or more diagnostic tests, and have been for decades. (10, 22, 29) They are allowed to prove themselves fit. Without exception or justification, the FAA denies access to these same tests by pilots the day they turn 60. This unethical double standard in medical evaluations based on age alone is not defensible! The truth is, it's not a safety standard - it's age discrimination.

Flight Performance Data: the Greatest Significance to Public Safety

Most importantly, decades of actual flight performance data, the measure of greatest significance to public safety, show that for every age group, older pilots are as safe as younger. The FAA's 1993 Hilton Study demonstrated that there was simply no diminution in flight performance as pilots reached age 60, (15) a finding confirmed by 1999 FAA data showing no difference in accident risk comparing pilots aged 20-59. (5) FAA data analyzed independently and published in the Chicago Tribune in 1999 showed that air transport pilots over age 60 were as safe as their younger colleagues. (24) In attempting to counter the Tribune's findings the FAA deliberately excluded these over-60 pilots from their analysis. However, FAA data from 1988-

1997 released last year confirms yet again that pilots over 60 are as safe as younger pilots. (31)
How many times does this information need to be repeated before it's believed?

The increasingly traveled skies of our nation require the most experienced pilots in the cockpit, those that are now forced out of work by the Age 60 Rule. The FAA clings irrationally to the notion that the age of 60 is an appropriate single standard for the evaluation of older pilot fitness. If any one of you were to undergo cardiac surgery or bone marrow transplantation tomorrow you would naturally want your life in the hands of the most knowledgeable and skilled doctor, regardless of his or her age. When I fly - when my children fly - I want that very same level of professional ability and experience in the Captain. The archaic and discriminatory Age 60 Rule prohibits our most experienced pilots from performing the work they know and do better than anyone else in the business, thereby compromising your safety, my safety, and the safety of all passengers. Thank you.

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