

UNITED AIRLINES, INC.
AGENCY INFORMATION COLLECTION ACTIVITIES VIS-À-VIS FOQA
COMMENTS

This report contains the comments from United Airlines as it pertains to Docket No. FAA-2019-0690 published by the Federal Aviation Administration (FAA) in the federal register on September 4, 2019. United Airlines has operated a Flight Operations Quality Assurance (FOQA) program since 1995 and supports the overarching value proposition referenced in the docket. However, United is submitting several comments. The feedback is not presented in any particular order of importance.

Necessity of collected information and its impact on FAA performance

Despite the primary value of a FOQA program benefiting an air carriers' Safety Management System (SMS), the data collected can support the FAA's oversight role. Reviewing aggregate FOQA data on a periodic basis permits the regulator important insight into operational trends that could validate safety risk management efforts and/or spawn hazard identification.

Estimated burden accuracy

The estimated time burden of 12.0 hours per year for existing programs is inaccurate. United estimates that current reporting expectations require resources tasked for approximately 30.0 hours annually.

Enhancing the quality, utility and clarity of information collected

United believes that iterative participation in a carrier's SMS is key to improving the quality, utility and clarity of information collected through FOQA. Safety assurance and safety risk management activities required by SMS leverage multiple data sources to drive operational decision-making. A participatory, non-punitive posture in a carrier's SMS would enable the FAA to improve operational oversight throughout the process/procedural lifecycle.

Burden reduction without compromising quality of collected information

Data collection should be accomplished via automated dashboards that are reviewed on air carrier property. Automating FOQA inputs and representing the data in a visual format greatly improves data processing efficiency and displays output information in an easily consumed, actionable way. Electronic dashboards also permit the implementation of controls that fosters a Just Culture.

United respectfully requests you consider the aforementioned points. Should you have any questions or require any additional information, we are available at your discretion.

10/4/2019

Sincerely,

A handwritten signature in blue ink, appearing to read "SM7".

Capt. Scott Mabrey
Sr. Manager – FOQA and FSAP
United Airlines – Aviation Safety