

Issues of policy, etc. Ontario Province AAO guide:

Background:

During the fire season in Alaska in 2004, there were separate occasions where Canadian CL-215 and CL-415 aircraft were dispatched to the state to assist with the firefighting effort. In these cases, the Canadian Government required that a Bird-dog (synonymous with our Aerial Supervision Module program) resource accompany these tankers on assignment. Because we (the U.S.) require that our own aerial supervision (ASM, lead plane or ATGS) resources supervise foreign airtankers on federal fires, there were many instances where the Bird-dogs sat idle while the CL's worked our fires, or worse the tankers were sent back to base because no US supervision was available for fuel cycle issues.

At the fall ASM meeting I was tasked with looking into, or inspecting, the training, qualification and operations protocol of the Canadian aerial supervision program. The idea being that we could change our policy to allow Canadian Air Attack Officers (Bird-dogs) to supervise air operations on U.S. Federal fires. There is some precedence for this in the Interagency Air Tactical Supervision Guide (NFES 1393) Chapter 4, section F-1 (b), which states that in the absence of a Federal ATGS, ASM or Lead plane, a Canadian AAO can supervise Canadian Airtankers. It does not state anything about a mix or aircraft, and does not include U.S. procured airtankers. The paragraph also states that deviations from this policy must be approved by the appropriate agency. This is what, I believe we are attempting to do at this time; come up with a protocol, in which we can, within certain parameters, allow the Canadian AAOs and Bird-dogs supervise not only their own tankers, but ours along with helicopters, etc. I must stress that this certification would not allow Canadian Bird-dogs to perform "lead", "chase" or "show-me" maneuvers with U.S. airtankers.

During the winter, I obtained a copy of the Ontario Province and British Columbia Air Attack Manuals. Other than a few regulatory and terminology differences, of which some are listed below, their operational procedures, tactics and strategy, and operational management system are very nearly identical to ours. I have not, at this time, had the opportunity to read any of the other province's guides, but they do have a national program much like ours, so other than administrative differences, I wouldn't imagine that there are any operational issues that might come up.

The Ontario AAO training program is very thorough; in fact much more so than our National ATGS system, in my opinion. It seems to be more like CDF's initial training system or the BLM's initial ASM training, with multiple stages including simulation requirements. Initial and subsequent check-rides are a requirement as well, for certification. The guide does not spell out Bird-dog flight training, or initial qualification standards.

There are three certifications for AAO's in Ontario (again it is not known if this is true for other provinces). "National" is the highest qualification. It requires two seasons of experience handling complex incidents to qualify for. A check-ride every three years is

required. (Provincial check-ride is also a separate qualification.) The second certification is “provincial”. This requires a check-ride each year until a National certification is achieved. It does not state that the Provincial AAO is limited to operations within the Province. But I assume that is the case. And finally, “alternate”. Again there is no definition, but I assume these individuals are not employed full time in the aviation branch. I take it much like our system where an engine Captain or Rec. Tech. may be qualified to fill in or take occasional assignments during periods of higher activity. These individuals must pass a check-ride each season to maintain qualification. All AAO’s are required to maintain a mission logbook to document missions and proficiency requirements. So, the system is already set up that would ensure that the most experienced AAO’s take these assignments. I would assume that we would not expect to see any individual with a qualification under “National” arrive at any of our bases.

These are some of the differences that jumped out at me while reading Ontario’s guide.

- A) Daylight rules: If I read this correctly, these rules always seem difficult to grasp for some reason, Ontario is apparently not restricted by the same rules as US resources. Specifically, it appears that they can drop after ½ hour after sunset.
- B) Flight and duty regulations: Bird-dog crews can fly 10 hours in any 24 hour period (total) and 8 (Bird-dog). What constitutes “Bird-dog”? Is it the same as our rules for 2 pilot operations?
- C) Terminology: “circuits”, “bomb-runs”, “hydro-lines”, etc.
- D) Fire Traffic Areas (FTA): much like we used to have before the change. They call them Airspace Control Zones.
- E) Fed. Aviation Regulations: Canada has a rule that essentially places a TFR automatically over any forest fire (below 3,000 AGL within 5 N.M.) as soon as it starts.

These clearly are not huge problems, and would simply need to be part of an in briefing of crews upon arrival. Issues on terminology differences should not be much of an issue either. We will need to come up with a standardized briefing package which can both be distributed to the Canadians beforehand, and be required before any tactical missions upon arrival. Many of the issues could be cleared up, and regulations assured in cases such as in question number 2, above. By having a U.S. aerial supervisor in an extended attack situation, FTA, TFR, or any other policy and regulatory issues would be assured.

Recommendations:

I think it is too late for the National Air Attack Working Group to attain any consensus on this issue for fire season 2005. So I suggest that we (BLM/AFS) provide an interim waiver for incidents on BLM lands in Alaska and Lower 48.

Many states and AFS already have adequate in-briefing packages for guest air crews, so it may only require a more formal review of policy issues than simply handing out the booklet.

Since Alaska will more than likely be the first area to utilize these individuals, it may be up to AFS and DOF air attack personnel to begin the briefing processes and evaluate performance for the rest of the country's benefit. It would also be beneficial to keep records of those individuals, and disseminate that information to Rusty Warbis, of who has received the initial briefing and qualification, so that in the event that the same individual pulls an assignment to another area, the process will not be held up.

There is a process in the works at this time to combine the leadplane operations guide (ILOG) aerial supervision guide (ASMOG) and interagency ATGS guide into one publication; Interagency Aerial Supervision Operations Guide. I believe when that happens, this (new) guide can be sent to the Provinces pre-season. This would cover all national (aerial supervision) policy issues, and at that time simply briefing on local differences and reviewing policy would be all that is necessary during subsequent seasons.

It will be incumbent on the Geographic Reps. and cadre to provide oversight and supervision during this phase. We need to brief and de-brief with all aviation and ground forces on the effectiveness and safety of these missions to ensure that what we are doing is adequate and appropriate.