

International Operations:

Flying Safely and Securely

by James Wynbrandt



The global market takes operators beyond national borders...and preparation is key

The 43rd NBAA International Operators Conference (IOC) united a world of international operations expertise as hundreds of corporate pilots,

service providers, safety experts and government agency officials gathered in San Diego, Calif., from March 21 to 24 for four days of presentations, panels

and ancillary learning opportunities focused on “ensuring international operators fly safely, securely and legally,” in the words of IOC Committee

chairman Greg Hanlon of DuPont. The terrorist attacks in Brussels and President Obama’s visit to Havana, both of which occurred during the gathering, underscored and informed the discussions of the tumultuous, ever changing world that global operators navigate.

Complying with the myriad

Incapacitated (or Worse) Abroad

One of the most critical items of preparedness for operators going to a foreign place repeatedly, emphasized IOC guest speaker Philip Skotte, U.S. State Department director of citizen services and crisis management, is to “reach out to that embassy ahead of time and establish contact face to face.” Echoing the rationale for business aviation itself, Skotte said that while e-mail is good, there’s nothing like shaking hands and getting to know somebody personally.

Skotte’s appearance at IOC (the first by a State Department official), was orchestrated to hammer home the importance of that advice, his invitation prompted by the death subsequent to last year’s conference of a U.S. pilot during a trip to Malaysia. The aircraft’s first officer and the company’s head of security provided an account of the tragedy to illuminate the many issues that arise and must be dealt with in such an unanticipated situation, as well as the benefits of prior embassy contact. (The presenters requested anonymity for themselves and their employer.)

The first officer found the body of the pilot, a male in his early 40s who previously appeared healthy, in the pilot’s hotel room after he failed to appear for the mid-afternoon crew call (just before 7 a.m. at company headquarters in the U.S.). The first officer recounted contending with controlling access to the hotel room as curious staff members tried pushing their way in; dealing with the emotional state of other crewmembers; and trying to explain to the growing number of authorities “with more and more bars on their sleeves” what the aircraft and its occupants were doing in Malaysia. Even with the translation help of the local flight handler, “Nobody understood corporate aviation; they all kept referring to the flight operation as ‘a vacation holiday,’” he said.

Fortunately, the company’s security chief had established contact with the

embassy when it began operations in the region a few years prior, letting embassy staff know “the nature of our business, our aircraft, and how frequently we would be there,” and revisiting the embassy on subsequent trips. When representatives arrived at the hotel, “the embassy already knew who we were and why we were there, and I think that helped facilitate their rapid response,” the security chief said.

In the immediate aftermath, the cause of death was indeterminate, and no one knew if others in the group were at risk of an infectious agent, or whether the aircraft would be quarantined. Meanwhile, company headquarters rushed to contact next of kin before they learned of the death from other channels, and arrange return of the passengers and crew, among the many other sudden demands the tragedy created. It took more than two months to identify the rare medical condition that felled the pilot, and repatriation of the remains was “lengthy and complex.” The presenters urged operators to prepare and have a plan in place for such an unexpected tragedy, with prior embassy contact a key component.

Despite the uncertain and sometimes dangerous world operators confront, whether the concern is infectious disease or terrorism, “There’s no need to panic,” said Matt Burdette of UnitedHealthcare Global Risk. “That’s not to say these aren’t serious concerns, but get solid information and avoid the hysteria. A lot of times, just practicing basic precautionary measures will forestall the most obvious threats.”

But be ready just in case. “You need to be thinking ahead,” Burdette urged. “Have you made a plan for when it occurs, and do you know your points of contact? Do you know what hotel you will go to in Brussels when this happens?”

—J.W.

rules of international operations may be particularly challenging for U.S. pilots, suggested John Harpool of AEG Fuels, moderator of a session called Expectations, Rules & Regulations for International Operations. “The grass gets no greener or easier than [flying] in the U.S., where we enjoy relatively unfettered operations,” Harpool said, contrasting that with the stricter regulations on private operators that prevail outside U.S. borders, “where we begin to feel discomfort.” Even U.S. Part 135 operators, which conform to Operations Specification (OpSpec) procedures similar to flight frameworks applied to both commercial and general aviation globally, can find rules confusing and sometimes conflicting. The sheer number of different sets of regulations, typically varying from country to country, compounds the challenges, said Guy Gribble of training provider International Flight Resources, while addressing the topic of sanctioned countries and hazardous airspace.

“There’s no single source document that says, ‘Do this, don’t do this.’ You need to have a proactive self-investment in this kind of trip planning,” Gribble said.

Moreover, with constant revisions and changes, what’s right today may be wrong tomorrow, said Adam Hartley of Universal Weather and Aviation, talking about the regulatory guides his company periodically disseminates. “It’s old as soon as I publish it,” he said. “I encourage you to do feasibility and requirement checks trip-by-trip.”



Global Security

IOC Security Panel presentations drew on headlines and major security concerns to limit the threats associated with international operations and offer mitigation strategies and tactics. An address by Philip Skotte, U.S. State Department director of citizen services and crisis management, marked the first appearance at IOC by an official from State, and came on the morning of the terrorist attacks in Brussels. Skotte explained U.S. embassy and consulate support capabilities and limitations through the lens of the tragedy in Belgium and how it would be responding and assisting affected citizens. Skotte urged attendees to “do three things to be prepared, and prevent something bad from happening: Get informed, get enrolled [in the Step program], and be insured [for medevac services].”

Skotte encouraged using the Department’s website in trip planning, citing its travel warnings on trouble spots, updated every six months, and travel alerts, spotlighting quickly developing danger areas. The Smart Traveler Enrollment Program (Step) provides a link to the Department in times of emergency, Skotte said, but “Facebook and other social media are better” for contacting loved

ones in a crisis. “Come up with a communication plan before your leave,” he advised.

(Greg Kulis, a pilot with L Brands, noted during his portion of the security presentation that Step enrollment is now “part of our dispatching process for every member of the crew,” adding, “I advocate for automatic enrollment when you dispatch international trips.”)

In recommending medevac insurance, Skotte noted that evacuation from West Africa to the U.S. during the Ebola crisis last year cost between \$150,000 and \$200,000, “so medical insurance is important.”

Data is another critical security arena. Competitors have always posed the threat of corporate espionage, and that threat is further complicated in today’s environment by rogue hackers (such as those who spilled Sony’s secrets) and “advanced, persistent threats” aimed at accessing and controlling computer systems (typically government-sponsored attacks), said John Zban, CIO of Satcom Direct, in his presentation on aircraft network security and compliance. Meanwhile, the aircraft is often the weak point in corporate security frameworks. “The airplane has been put aside,” said Zban. “IT people don’t want to talk about it, and flight departments want to leave it as is.”

Among the sources of potential onboard data breaches: “Forced routing” requires communications and Internet traffic to be routed through specific networks, depending on the location of the aircraft. When flying over areas where communication security is of particular concern, “Limit confidential

information sent, received or discussed electronically,” Zban said. He advised consulting the aircraft’s network service provider, who can offer encryption options and provide notification of in-flight changes in Internet traffic routing. For absolute protection, “Pull the circuit breaker” on cabin Wi-Fi and connectivity equipment, Zban recommended. “No connection, no risk.”



Onboard Medical Issues

Given the ailments that plague the general population, facing an onboard medical emergency is a question of when, not if, suggested Paulo Alves, MD, MedAire’s global medical director for aviation health. In the session How Will You Manage a Medical Emergency? Alves noted, “The reality today is that having some chronic disease or illness that’s under control is the new normal.”

Moreover, the length of a flight is proportional to the chance of a medical problem en route, putting those on long-haul international flights at greatest risk of an emergency. Forty percent of emergencies occur on flights longer than six hours; 22 percent occur in the first three hours, and 38 percent on flights between three and six hours, according to MedAire.

Though passengers are most often affected, the pilot, cabin crew or unidentified crewmember were affected in 26 percent of all

medical emergencies, Alves said, citing data from the files of MedLink, the company's in-flight consultation service that assists flight crews in medical emergencies. The three most common in-flight medical issues, gastrointestinal (22 percent), neurological (16 percent) and ear/nose/throat (13 percent) problems, comprise more than half of all MedLink's in-flight emergencies. Other common problems include respiratory, infection, injury, allergy and cardiovascular events. Most of these emergencies (56 percent) are resolved in flight, but 15 percent require activation of ground resources upon arrival, with 4 percent of flights diverted to deal with the medical issue. Patients require transfer to hospitals in 2.1 percent of cases, and expire in 0.6 percent of the emergencies.



Regulatory Update

EASA Air Ops for non-commercial complex (NCC) airplanes takes effect on August 26. The rule affects EASA-registered aircraft, but if the parent company of an N-registered aircraft has relocated to an EASA state, for tax inversion reasons, for example, the aircraft will have to be in compliance. "Get your legal team to start figuring it out," advised Chris Duffek, a JP Morgan Chase pilot, in the Hot Topics: Europe presentation.

EU-ETS, the European Union's plan to tax emissions of turbine aircraft operating to, from or within the EU, is an issue again. "If you stopped worrying

about it in 2012, it's coming back. It can affect the way you operate, [and] it can affect your bottom line," said Hartley of Universal Weather and Aviation. Since 2012 private operators have been exempt from payments, though they must have monitoring procedures and calculate and report emissions. The EU has been holding off on full EU-ETS implementation while ICAO tries to craft a global system, to be in place by 2020, but if the EU feels that's not feasible, "the exemptions will go away on January 1 next year," Hartley said.

Meanwhile, the interpretation of EU importation rules, under which some Part 91 operators were charged an import tax for aircraft flown to Europe during normal operations, appears finally settled: "If you're not operating flights for remuneration, you are there under a temporary mission," Hartley summarized. Carrying brochures and other business-related materials is also recognized as a part of the private business aviation mission.

In the U.S., preparation for the Jan. 1, 2020 ADS-B mandate appears lagging, said Carey Miller of Universal Avionics during the Avionics: Mandates, Datalink and Navigation session. "There are only 990 working days until then," Miller said, encouraging operators to take action. "Avionics manufacturers are offering incentives to equip today, avionics facilities have capacity today, engineering firms can get the approvals today."

He noted RVSM requirements affected only 6,500 corporate aircraft, but the ADS-B mandate affects about 18,500, and math dictates that the longer operators wait, the greater the chance of their being without ADS-B and grounded come the first day of the next decade.

Regional Reviews

The annual Regional Reviews cover regulatory, operational, cultural and other key issues affecting operations in eight geographic areas girdling the globe. Following the convention introduced in last year's regional reports, a round-the-world flight route linked the reviews, serving as a framework for the presentations.

Cuba: Interest and arrivals in Cuba from U.S. operators only grow, and the country appears more accessible by the day. "People say, 'Let's go to Cuba before the Americans arrive,'" said Paul Aranha of Caribbean flight-planning service Trans Island Airways. "They've already been there in droves." He spoke via video from the Bahamas, where duty had temporarily marooned him.

Among the signs of eased GA operations: A Temporary Sojourn License from the U.S. Commerce Department is no longer required for U.S. aircraft flying to Cuba. Twelve categories of U.S. citizen are approved for travel to the island. Overflight and landing permits, routinely granted, are both required in Cuban airspace. For landing permission, the operator must provide the purpose of the passengers' trip, itinerary and whereabouts of accommodations. In a region of the hemisphere already known for operating on decelerated "island time," Aranha advised to "add an extra hour to Cuba" for operational activities. Looking ahead, with the Presidential visit to Havana under way as he spoke, Aranha had no predictions on eased access but simply noted events are "changing rapidly."

India: The circumnavigation began in New Delhi (VDIP) during the regional review of India & the Middle East. The nation presents many of the most challenging operational issues faced by operators around the globe; the same cautions and advisories necessary here can be applied to many other extreme environments, and GA flight crews that can operate in India (+5.5 GMT) can likely succeed anywhere, reported John Tuten, chief pilot for Honeywell.

From Tuten's windshield, monsoon weather is complemented by persistent 2 km visibility in smoke and fog. The closest alternate airport may be well over 100 nm distant, and the next another 100 nm beyond that, so carry extra fuel, he advised. Almost all Part 91 operations are "restricted" rather than the "normal" category of commercial operations, which requires raising approach minimums, whose values aren't provided on charts and must be calculated for each approach. Bring a tow bar.

Make sure everything that will be needed while on the ground is removed from the aircraft. As is the case in a number of other countries, once passengers and crew have disembarked, the aircraft is sealed and off limits until departure. Prior access requires submitting a request to the airport authority and airport police, who will schedule a time to escort and observe the representative during the retrieval process, and then reseal the aircraft.

Russell Bunker of trip services provider Universal Weather and Aviation reminded operators that aircraft entering India's airspace for overflight or landing from a "prior reference" country (Pakistan, China, North Korea, Somalia, Sudan, Iran and Iraq) require extra time for processing permits, up to nine working days for permission to land at a civilian airport. If departing Mumbai, pilots must go to the tower to file flight plans. "You'll be questioned, the handler yelled at, then you'll be allowed to go," Tuten said.



U.S. Customs Policy and Procedures

Eric Rodriguez, general aviation program manager at U.S. Customs & Border Protection (CBP), who's credited with spearheading efforts to create GA-oriented security policies and procedures for business aviation operations, provided an update on the agency's three top initiatives: publishing a CBP General Aviation Operators' Guide; simplifying the Border Overflight Exemption process; and developing

an APIS Single Syntax system for GA. Rodriguez cited last year's formation of the CBP GA Working Group as a milestone on moving these programs forward.

Replacing the obsolete Private Flyers' Guide, the Operators' Guide will contain all CBP processing requirements and policies. The agency envisions "an electronic document you can pull up on your phone or device," Rodriguez said, easily referenced by agents and customers on a ramp for consultation, for example.

The current Overflight Exemption Program permits general aviation aircraft crossing the southern U.S. border to overfly CBP-designated processing airports and fly to any airport where standard CBP services are available. But the exemption filing process is inefficient. The new initiative

Disease Concerns

"Disinsection" has become a worldwide issue, Rich Nath of World Fuel said during the Southeast Asia Regional Review, with some countries requiring aircraft to undergo the procedure upon entry. "It's a way of getting rid of hitchhiker insect species—malaria, Zika—and trying to keep the ecosystem safe," he said. Australia and New Zealand have instituted disinsection programs. EPA rules prevent the sale of disinsection aerosols in the mainland U.S. but they are obtainable in Canada, Hawaii and in the Pacific region.

In her portion of Europe's Regional Review, Jeppesen's Nancy Pierce reported Italy also has a disinsection program. Subject aircraft must give 48 hours' notice of arrival. The disinsection process typically takes less than three hours, Pierce said (30 minutes to spray, an hour to remain sealed and an hour or more to air out the cabin). The cost for disinsecting a Global recently was about \$500 dollars. The paperwork required for the process includes recording the serial numbers of the disinsection aerosol cans.

—J.W.

South America: The South America Regional Review focused on Brazil, explained session moderator Phil Tyler of flight planning service AvPlan Trip Support, because it's one of the most complex regions in South America procedurally; it's among the most frequent destinations on the continent; and Rio's Olympics officials expect at least 1,000 business aircraft.

Picking up the round-the-world route for its transatlantic leg from Dakar, Senegal (GOOY), to Recife (SBRF), Antonio Savio, pilot for Brazil-based Lider Aviação, reminded pilots of the violent thunderstorms and other weather hazards associated with the Inter-tropical Convergence Zone in the equatorial region. Flights from North America should consider the longer coastal route, he advised, rather than the more direct flight path over the Amazon, which provides few options for handling unplanned events. An emergency locator transmitter or a jungle survival kit is required for Amazon overflights.

Brazil has Byzantine permitting processes, customs and immigration rules and airport fee schedules, as Cynthia de Oliveria from Lider Aviação's flight planning department highlighted. Airport fees are high, calculated by individual airport administrators factoring in time on ground, origin of the flight and destination.

During Olympic events, airspace around stadiums and other sports facilities will have exclusion "zones," four- and seven-nm-diameter concentric circles of prohibited red and restricted yellow areas extending to FL195. Some airports in Rio and other cities hosting competitions are within restricted areas, and GA aircraft operating within them may require aircraft security inspections or checks. De Oliveria said zone rules were developed for regulating airline operations, and "discussions about the applicability of these measures to general aviation" continue.

A new Temporary Admission Term (Teat) limit imposed by Customs at some airports in Brazil, Manaus among them, requires aircraft to leave the country by an assigned date or face a fine up to 10 percent of the aircraft's value. The Teat document is available only in Portuguese. Awareness of the exit date is especially important for affected operations "if it's necessary to change the schedule of the flight," because the exit date can be overlooked in the process, de Oliveria said.

The Zika virus—the mosquito-borne disease linked in Brazil to an outbreak of microcephaly among babies born to infected mothers—is also a concern of visitors, and AvPlan's David Kang differentiated Zika's "myth and reality" during his portion of the South America overview. Kang noted the Olympics are staged in July, Brazil's driest month, when the mosquito population is low, "so it's not a huge threat" to visitors. If contracted, "it's just a bad flu for most people," he said. "The risk is to pregnant females. It is not Ebola, it is not West Nile Virus, it is not smallpox; it can be managed."

If Venezuela lies along the route to or from Brazil—or anywhere else—avoid it, Kang advised. Overflight permits can't be secured in advance and "they have a tendency to make up unpaid fees" for previous services, he said, and prohibit overflight until immediate payment is arranged.

International Operations

Hong Kong: Parking restrictions and a new slot allocation system in Hong Kong are impeding business aviation operations, Bjorn Knudsen of M&N Aviation reported during the China, Russia and “The Stans” regional review. In March, slot allocation was ceded to an automated computer system that favored larger-capacity aircraft. As a result, “we’ve had some corporate operators stuck for two days trying to get a departure slot,” Knudsen said. It’s also important to cancel unwanted slots. “Supposedly they will put you on a ‘bad’ list if you don’t,” he said, and possibly bar offenders from the airport.

aims to use APIS (Advanced Passenger Information Service) information to automatically provide over-flight exemptions. This effort will mark the debut of the Trusted Operator program, in which CBP will factor an operator’s past compliance with APIS accuracy in granting such exemptions, which Rodriguez called a “paradigm shift” in processing policy.

The Single Syntax system is a planned dedicated GA operators’ APIS system, allowing for processing procedures different from those applied to Part 121 operators. Single syntax refers to having a single “point of reference” such as an aircraft tail number, rather than the ever changing flight numbers, that an aircraft would be assigned. The current initiative will evaluate the benefits and efficiencies of such a dedicated APIS system. Rodriguez emphasized that all these efforts to ease processing requirements depend on the accuracy of the passenger data operators submit to CBP. “If you want us to use APIS, the APIS must be good,” he said.

For procedural breaches, the agency has pursued an educational rather than punitive approach, Rodriguez noted. Since 2009, while processing some 150,000 inbound flights annually, CBP has levied just 42 penalties. “We’re not out to raise revenue for the government,” he said, “we’re out to raise compliance higher.” □

Africa: Africa’s vastness, lack of infrastructure, incessant conflicts and welter of differing regulations make it a particularly challenging operating environment, both in the air and on the ground, on airport and off. But Mark McIntyre, chief pilot at Mente, who has extensive operational experience in Africa, recommends crewmembers who operate anywhere around the globe create a personal safety kit. His includes a portable smoke hood that provides 20 minutes of breathing time (“We’ve all seen hotel fires in Dubai”); a headlamp (“You don’t want to have to hold a flashlight”); and a charging brick to keep personal devices powered (“In a siege like the hotel in Mumbai, you could end up hiding in the hotel room”). He also disseminated an aircraft emergency departure checklist, for times when you absolutely, positively have to depart ASAP, and advised developing a checklist of minimum items required from preflight to departure. “We can get airborne in a Global in five minutes,” he said. “If we ever need to do it, we have a safe way we think will work.”

Universal Checklist



Whether the operational environment is benign or challenging, the presentations revealed that common oversights often trip up international operators, and simple checklist items for avoiding them include the following:

- ✓ Make sure the expiration date for passports is beyond any limits imposed by the countries you plan to visit and passports have the requisite number of empty pages that may also be mandated.
- ✓ Check to confirm that the information on passengers’ passports matches the information submitted on customs and other forms.
- ✓ Account for holidays when calculating time required for getting permits and for the impact on the availability of services during your mission.
- ✓ Check to confirm the flight plan in the FMS matches the clearance you received.