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Subject: Response to ATSB safety recommendation
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ATSB SAFETY RECOMMENDATION

The Australian Transport Safety Bureau recommends that Angel Flight Australia takes action to enable it to consider the safety benefits of using commercial flights where they are available to transport its passengers.

ANGEL FLIGHT RESPONSE

Angel Flight has considered the recommendation carefully and has determined that it maintain its current policy of giving priority to using private flights where possible and to continue to use regular public transport flights when private flights are cancelled or unavailable, and for transfers between capital cities.

The reasons for our decisions are:

- Angel Flight rejects the claim in the ATSB report that, for Angel Flight passenger carrying flights, the “fatal accident rate was more than seven times higher per flight than other private flights” as invalid.

A valid analysis addressing passenger risks would require comparison of passenger carrying Angel Flights and other passenger carrying private flights. Since no such data are available for other private operations, the only reasonable comparison is between all Angel Flight operations and all other private operations. Even then, results must be treated cautiously because an unknown proportion of private operations involve circuit training and short local flying whereas all Angel Flight operations involve flights with an average sector length of 1.5 hours.

The analysis in Table B2 on page 69 shows that, when all Angel Flight sectors are included, the fatal accident rates are 0.5 and 0.2 per 10,000 flights for Angel Flight and other private flights respectively, and the difference is not significant. Furthermore, when all accidents are included, the rates are 1.1 and 1.5 per 10,000 flights for Angel Flight and other private flights respectively.

- Angel Flight rejects the claim in the ATSB report that “community service flights conducted on behalf of Angel Flight Australia (Angel Flight) had substantially more occurrences per flight than other private operations” as invalid.

ATSB has compared Angel Flight operations, approximately 95% of which operate to and from Class C and D airspace with other private operations where an unknown, but undoubtedly much lower, proportion of flights are in controlled airspace. Angel Flight has been unable to find any data that

would permit a valid comparison of similar operations for other private flights.

The ATSB report acknowledges, in the Safety Summary, that “The types of occurrences where flights organised by Angel Flight were statistically over-represented (as a rate per flight) compared to other private operations were consistent with these operational differences.” However, the report then immediately ignores the vastly different operating environments and claims that the difference “indicated an elevated and different risk profile in Angel Flight”.