

**About the Commentary:** The Commentary addresses selected issues within the Code of Conduct to elaborate on their meaning, provide interpretive guidance, and suggest ways of adopting the Code of Conduct. It is intended primarily for implementers, policy administrators, aviation association management, and pilots who wish to explore the Code in greater depth, and will be updated from time to time. Please send your edits, errata, and comments to <[PEB@secureav.com](mailto:PEB@secureav.com)>.

## COMMENTARY ADDRESSING CODE OF CONDUCT MODEL, LENGTH, AND ORGANIZATION

### 1. Model

The Codes of Conduct (“Codes”) are *model* codes—not monolithic, mandatory, regulatory or otherwise proscriptive. As such, they are inherently flexible, aspirational recommendations and voluntary resources intended to be modified to suit the unique needs of each implementer. They simply offer a foundation for drafting and implementing diverse codes of conduct and associated guidance.

### 2. Length

#### *-Size*

No particular size is optimal for all users – one size doesn’t fit all. Some pilots may desire a substantive, robust reference document as a professional code or a resource from which to “open a conversation;” other pilots may desire a broad-based “vision of excellence” to assist in customizing a checklist, “best practices,” or personal minimums documents—and as such, length is not pivotal. Still other pilots may desire a one-page document (yes, we’ve responded to the mantra “if it’s not on a single page, I won’t read it”). A one-page model code is also available.<sup>1</sup>

#### *-Acronyms*

Abridged versions of the Codes containing acronyms and similar memory aids have been considered and found lacking. While there is clear evidence that acronyms can help people pass tests of memory, there is insufficient evidence that such aids add to the wisdom that underlies genuinely *ethical* practice. Good judgment requires more than mere memory.

Good judgment might sometimes be aided by good memory, and if a card or acronym could assure good judgments, supplying such aids would be a positive venture, Professor Bill Rhodes explained.

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<sup>1</sup> See, for example, the abridged *Aviators Model Code of Conduct* <<http://www.secureav.com/AMCC-v2-Abridged.doc>>, and the one-page version of the *Flight Instructors Model Code of Conduct* (linked from “Additional Resources” in that Code) <[www.secureav.com/FIMCC-Summary.doc](http://www.secureav.com/FIMCC-Summary.doc)>. As an historical note, the first version of the Aviators Model Code of Conduct was a single page document. That single-page version was criticized as failing to: (i) explain how pilots might implement the principles, and (ii) provide actionable examples of possible text (as a model) to facilitate expedited and well-considered content. Further general/introductory guidance on the Codes of Conduct is available at <<http://www.secureav.com/Comment-AMCC-Introduction.pdf>>.

My high school prohibited our possessing “Cliffs Notes” for a good reason, even if I did not appreciate it at the time.

In 20+ years of teaching professional ethics, I’ve seen such “aids” *circumvent* developing good judgment. Sometimes this resulted from a student’s thinking he could get by with the shallow appearance of ethical thought or trustworthy judgment. Most of the time, though, it was because the student simply misunderstood the nature of professional ethics and tried to substitute a memorizable checklist appropriate to a bureaucrat. When I saw evidence of that shallowness on exams, I typically took it as a sign of my own failure as an educator to convey the nuanced nature of making ethical judgments. I may as well have been teaching regulations.

Products are one thing; positive effects are another. One can endorse the use of memory aids or distillations by those whose judgment is already developed, or by those who are developing judgment under supervision. Indeed, the United States Marine Corps issues (or at least used to issue) a card to its members *after* they have completed rigorous indoctrination and training, thereby earning the right to carry the card and to reinforce identity and help avoid “occasions of sin.”

AMCC adopters and implementers are encouraged to develop their own acronyms or lists *after* they understand the AMCC’s concepts as a way of keeping them present to mind. Used as a shortcut, however, they may give the appearance of ethical development while actually undermining it, defeating their purpose and insulting genuine professionalism in the process. Dr. Rhodes concluded, “I regret to say that I’ve seen that happen--frequently. In short, the value or disvalue of such shortcuts depends on their use.”

### **3. Organization**

No particular organization of the Codes’ content is optimal for all users. Many formulations were considered—and rejected—including one interlineating the Codes’ principles and Sample Recommended Practices (SRPs). The interlineated version was found unworkable because (a) many of the SRPs were applicable to more than a single principle, (b) readers tended to compartmentalize and artificially limit the applicability of the SRPs to the adjacent provision, (c) the end-result was a highly unbalanced work product – both visually and substantively, (d) significant redundancy would be necessary to cure the imbalance (i.e., restating SRPs in multiple locations), and (e) from a pedagogical perspective, it was feared that the interlineations would not encourage the reader to think and grapple with the issues (and doing so are hallmarks of effective learning). Implementers are encouraged to experiment with, and adopt an organizational structure suitable for their unique requirements.

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