Part 117 at Southwest Airlines
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- Trip and Line construction buffers
- Contractual Buffers on Pilot transactions
- Crew Management System CSS/CWA
- SkySolver-real time alerting and problem solution tool
- Part 117 Report
- ACARS messages
- CMO issues
  - FDP extensions
  - Unforeseen and within Southwest’s control
  - Part 121 fuel planning requirements and foreseen circumstances
  - Part 117 reporting
- Part 117 during severe IROPS
Part 117 Limits

117.5 Fitness for Duty

- Each Pilot must report for any flight duty period (FDP) rested and prepared to perform his assigned duties. Southwest Airlines must not assign and no Pilot may accept assignment to an FDP if the Pilot has reported for an FDP too fatigued to safely perform his assigned duties. Southwest Airlines must not permit a Pilot to continue an FDP if the Pilot has reported himself too fatigued to continue the assigned FDP.
Trip and Line Construction Buffers

- Table A less 25 minutes
- Table B less 60 minutes for AM trips
- Table B less 120 minutes for PM trips
- 11:30 planned minimum rest between duty periods and between trips.
- Max of three WOCL incursions per trip
- Max of 95 hours of planned block per line
Contractual Buffers on Pilot Transactions

• Define what a Pilot can schedule.
  • Table A less 30 minutes
  • Table B less 90 minutes
  • 55 FDP hours in 168
  • 182 FDP hours in 672
  • 98:30 in block time in 672
  • 998 in block time in 365
  • 11 hours of rest between FDPs
  • 31 hours of rest in 168.
Crew Management System CSS/CWA

Real time operational updates for the entire day.
SkySolver

- Alerting and solutions for the most restrictive of the CBA or FARs.
Part 117 Block and FDP Limitations Report

- Presented to the Crew prior to departure.

<table>
<thead>
<tr>
<th>Captain:</th>
<th>First Officer:</th>
</tr>
</thead>
</table>

Is your Takeoff time limited by MTO or LWU for this Leg?

**Crew Max Taxi Out (MTO) - Block Time Limitation (Out to OFF):**

<table>
<thead>
<tr>
<th>Limit</th>
<th>Reason</th>
<th>Limiting Crewmember</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>CA/FO</td>
</tr>
</tbody>
</table>

Maximum taxi time to ensure block in at destination is within flight time limitations.

Amount of Taxi time available prior to takeoff: 06:31 Table A CA/FO

**Crew Latest Wheels Up (LWU) - Limited by Flight Duty Period (FDP):**

<table>
<thead>
<tr>
<th>Limit</th>
<th>Reason</th>
<th>Limiting Crewmember</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>CA/FO</td>
</tr>
</tbody>
</table>

Latest wheels up time to ensure block in at destination is within FDP limitations.

Without FDP Extension, you must Takeoff by:
- 1431 C Table B CA/FO
- 2031 Z

With FDP Extension, you must Takeoff by:
- *PIC concurrence required
- 1531 C CBA Duty FO
- 2131 Z
### Part 117 Block and FDP Limitations Report

- The Crew is within one hour of a limit

<table>
<thead>
<tr>
<th>Part 117 block/FDP Limits for Flight 667 DAL - MCI on 12/21/2016 as of 02/18/2016 16:17Z</th>
</tr>
</thead>
<tbody>
<tr>
<td>Captain:</td>
</tr>
<tr>
<td>First Officer:</td>
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<tr>
<td>Is your Takeoff time limited by MTO or LWU for this Leg?</td>
</tr>
<tr>
<td>Crew Max Taxi Out (MTO) - Block Time Limitation (Out to OFF): Limit</td>
</tr>
<tr>
<td>Maximum taxi time to ensure block in at destination is within flight time limitations</td>
</tr>
<tr>
<td>Amount of Taxi time available prior to takeoff: 07:46</td>
</tr>
<tr>
<td>Crew Latest Wheels Up (LWU) - Limited by Flight Duty Period (FDP): Limit</td>
</tr>
<tr>
<td>Latest wheels up time to ensure block in at destination is within FDP limitations</td>
</tr>
<tr>
<td>Without FDP Extension, you must Takeoff by: 1546 C</td>
</tr>
<tr>
<td>2146 Z</td>
</tr>
<tr>
<td>With FDP Extension, you must Takeoff by: * PIC concurrence required</td>
</tr>
<tr>
<td>1716 C</td>
</tr>
<tr>
<td>2316 Z</td>
</tr>
</tbody>
</table>
ACARS messages

ACARS-PIC concurrence with FDP extensions

ACARS FDP EXT MSG
E91065
WITH MAX EXT AVAIL
LATEST OFF TIME: 2035Z
LATEST IN TIME: 2130Z
PROJ EXT 0:05 / AVAIL
2:00
PIC ACCEPT OR REJECT?

DATALINK
<ACCEPT

<RETURN

DATALINK
REJECT>
ACARS messages

ACARS MSG DISPLAY
CREW SCHED MSG
THE PILOT:
E12345
IS APPROACHING A DUTY
OR FLIGHT TIME LIMIT. IF
YOU ARE UNABLE TO TAKE
OFF BY 1035Z
CONTACT YOUR DISPATCHER.

RETURN TO
< REC MSGS PRINT >
MSG FROM CREW SCHEDULE
CMO interpretations

• Pre-takeoff extensions cannot subsequently exceed two hours after takeoff.
  • Minimize the number of pre-takeoff extensions.
    • If it’s more than 30 minutes to the new ETD and Crew Scheduling can replace the Crew, they will.
    • If it’s less than 30 minutes to the new ETD, the extension is allowed to proceed.

• If an extension is projected to be 60 minutes or more, Crew Scheduling will work with Dispatch to ensure the flight will terminate within the two hour extension.
CMO interpretations

• Unforeseen circumstances and within the Carrier’s control.
  • Most circumstances such as weather, ATC, ramp congestion and upline delays are now deemed “foreseen”.
  • Pre-takeoff extensions have been recently deemed within our control as well. “You can bring the flight back to the gate and replace the Crew.”

• Post takeoff flight time exceedances and FDP extensions are frequently deemed foreseen circumstances if the Dispatch Release contained contingency and holding fuel. “You knew you were going to have to hold over BWI.”
CMO issues

• In 2019 our POI has generated:
  • One LOI
  • 17 Corrective Action Letters
  • Two General Letters
  • 30 RFIs
  • 42 emails requesting additional info
Part 117 during severe IROPS

Between Planning Buffers, CBA buffers, real time updates, systems, info shared with Crews and lots of proactive coordination with Dispatch, Part 117 is generally manageable.