

FIGHTING FATIGUE: ALPA'S IN FOR THE LONG HAUL

By Capt. Don Wykoff (Delta),
Chairman, ALPA Flight-Time/
Duty-Time Committee

Fatigue has shadowed airline pilots since before the Association was created in 1931; and events of the last several years have made it worse. Defying logic, no substantive changes have been made to the regulations that set our flight- and duty-time limits and our minimum rest in more than 50 years.

In October 2007, at the first Joint Scheduling Seminar hosted by ALPA's Collective Bargaining Committee and Flight Time/Duty Time Committee, ALPA's president, Capt. John Prater, announced creation of the ALPA Blue Ribbon Panel on Fatigue.

He charged our four-pilot panel (see box) to review the science and economics surrounding pilot fatigue as well as the regulations regarding flight- and duty-time limits and minimum-rest requirements in both Canada and the United States. We also were asked to recommend actions for ALPA to take to address this serious safety concern.

So what have we been up to?

Regarding safety and human performance issues, we've been reviewing the latest science on fatigue, determining the applicability of those findings to our operations, and developing education materials for distribution to pilots.

Similarly, on the industrial side, we've reviewed the U.S. and Canadian regulations and have been analyzing the implications and industrial effects of alternative, science-based regulatory schemes on current schedules. When we're done with that, we'll make our recommendations to ALPA, engage the appropriate stakeholders to make needed changes, and educate ALPA members to support the change.

As I write this, the FAA has invited all stakeholders to discuss fatigue in the air transportation industry at the FAA Fatigue Symposium scheduled to be held June 17-19 in Washington, D.C. The event will include other em-

ployee groups, not just airline pilots. ALPA will have a leadership role in breakout sessions for flight operations. The Association's goals will be to shape the argument and influence any outcomes, such as changes in regulations and adoption of fatigue risk management systems.

We'll keep you informed. 🌐

ALPA BLUE RIBBON PANEL ON FATIGUE

- Capt. Martin Gauthier (Air Transat), former member, ALPA Canada Board
- Capt. Rory Kay, ALPA Executive Air Safety Chairman, elect
- Capt. Jeff Kilmer (FedEx), chairman, ALPA Pilot Assistance Committee
- Capt. Andy Nordgren (American Eagle), member, ALPA Collective Bargaining Committee
- Capt. Don Wykoff (Delta), chairman, ALPA Flight-Time/Duty-Time Committee 🌐

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ULTRA-LONG-RANGE OPERATIONS

An important fatigue-related initiative is under way with ALPA's extensive involvement that we expect will have significant ramifications in our quest to develop more reasonable flight- and duty-time rules.

In 2006, the FAA finalized Operations Specification A332 for Delta Air Lines, which provided flight- and duty-time limits and minimum-rest requirements for Delta's ultra-long-range, or ULR, operations. ULR flights are, by definition, scheduled flights of more than 16 hours or duty days of more than 18 hours. Currently, FAA regulations are silent on how ULR operations should be conducted from the standpoint of flight- and duty-time limits and minimum-rest requirements.

An important provision incorporated in A332 outlines when flights approaching 16 hours must be flown under A332's provisions. If a flight segment that is scheduled for less than 16 hours actually per-



Delta's B-777 flights between New York and Mumbai, India, are *scheduled for 15:45 eastbound and 16 hours westbound, thus requiring special ops specs.*

forms more than 16 hours more than 10 percent of the time, A332 can be imposed on the airline. Because of this provision, Continental and American have flights that will likely become ULR flights covered by A332 in the upcoming fall and winter flying season.

Last year, the FAA advised the airlines' managements that they would be required to follow the same ops specs as those approved for Delta. But the airlines pushed back. They don't want to merely adopt what was developed for Delta; they want to amend A332 to fit their own operations. As a result, the

FAA began meeting earlier this year with the affected airlines' managements and pilot representatives to develop an ops spec for those ULR flights; those meetings are ongoing.

At a meeting in mid-April, we learned of a plan by the FAA to collect fatigue data from a representative sample of pilots engaged in international operations. The data collection is proposed to follow the activities of volunteer pilots on a 24/7 timetable over the course of a month to evaluate the effects of fatigue on all long-range international flying, including ULR flights. This data collection is a positive from the pilot perspective. We have long been saying that fatigue is an issue—now we have the opportunity to prove it via scientific study. Our representatives were briefed on May 1 by a fatigue science steering committee on the details of the data collection, which is scheduled to begin later this year.

This entire activity presents us with a genuine opportunity to influence the outcome of any changes to flight- and duty-time rules, whether accomplished by regulation or FAA guidance. However, it also poses a stiff challenge. You will be hearing a lot more about this activity during the coming months.—DW

FATIGUE: "A FULL-FLEDGED SAFETY ITEM"



Buried in the ALPA *Administrative Manual* (Section 110—Flight Time/Duty Time), found in the Administra-

tive section of the ALPA e-library at Crewroom.alpa.org, is the following position statement, adopted by the ALPA Board of Directors in 1968 and amended in 1978: "Pilot fatigue induced by long on-duty periods, unrealistic work-rest cycles, diurnal considerations, cockpit overloads, and other factors over which the pilot has no control shall be given the stature

of a full-fledged safety item, and solutions of the many facets of the fatigue problem be pursued diligently through government regulation, legislation, and contractual agreement."

We have been fighting onerous schedules and outdated flight- and duty-time regulations since ALPA was created in 1931, and the battle lines have shifted back and forth through the decades. The science of fatigue and sleep has evolved and so must our policies. Resolving these issues will require our collective effort and determination.—DW