

ALPA's Leaders Approve New Flight-Time, Duty-Time, And Minimum Rest Policy

ALPA's Executive Board unanimously approves new policy that incorporates current scientific understanding of fatigue and sleep

By Jan W. Steenblik, Technical Editor

A very few human beings on this planet—perhaps no more than half a dozen—do not sleep. The other seven billion of us literally cannot live without it. And sleep researchers have established without question that the only true antidote to fatigue—which increases the risk of accidents—is getting enough sleep.

On October 28, ALPA's Executive Board unanimously adopted new Association policy that incorporates scientific understanding of fatigue and sleep and spells out in specific detail what ALPA's experts on the subject know, from voluminous research and years of experience as line pilots, to be what pilots need.

Capt. Don Wykoff (Delta) is ALPA's executive administrator and chairman of the Association's Flight Time/Duty Time (FTDT) Committee. He also co-chaired the FAA's FTDT Aviation Rulemaking Committee (ARC) that, between mid-July and September 1, developed recommendations for the agency to use in developing proposed new FTDT rules. As one of the principal architects of the new ALPA policy, Wykoff walked the Executive Board through the science and logic behind the policy changes.

Wykoff emphasized that, despite the recent renewed

focus on pilot fatigue brought about by the NTSB investigation into the Colgan Air Flight 3407 crash on February 12 and FAA Administrator Randy Babbitt's creating the FTDT ARC as a result, the new ALPA policy "is *not* a product of the past 60 days—it's a product of 3 years of work through ICAO, IFALPA, and direction from our Board of Directors. It reflects current science and the need for increased pilot alertness and fatigue mitigation."

Wykoff and other ALPA leaders recognized the need to change the Association's FTDT policy to harmonize that policy with that of IFALPA and ICAO. Also, with the FAA putting FTDT reform on the fast track, with a notice of proposed rulemaking (NPRM) promised by the end of this year, ALPA's leaders needed to move deliberately but without delay to craft a policy that would be consistent with the Association's response to the NPRM.

The new policy deals with seven major areas—rest, duty, extension of duty, cumulative fatigue, augmentation, reserve, and fatigue risk management systems (FRMS).

Rest

Regarding rest, the new ALPA policy calls for at least 10 hours free of duty for domestic operations, based on an opportunity for 8 hours of sleep. Expanded rest—i.e., for "flag" (international) operations—should be at least 14 hours long to account for bedding down several time zones from home.

"The captain owns 8 hours behind the door," says Wykoff, "and reduction of minimum rest—i.e., he or she should have the authority to ensure that all members of the crew have the opportunity to get the rest they need."

Duty

The term "duty" encompasses the flight duty period
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(FDP) and can also include such activities as training, deadheading, and administrative tasks. FDP is defined as the time from sign-in to brakes set at the end of the last flight of the duty period.

Current Canadian aviation regulations limit flight duty periods to 14 hours (which can be extended to 17 hours); U.S. federal aviation regulations, to 16 hours. Both Transport Canada and the FAA set these limits without regard to (1) time of start or (2) number of flight segments—but ALPA's policy calls for a range from 9 to 13 hours, depending on both of these important factors. The shortest limits apply to flightcrew members who must report for duty during what sleep researchers call the "window of circadian low (WOCL)," the period between 2 and 6 a.m.

Flight time

Similarly, the voluminous body of research on fatigue supports increasing maximum flight time in a duty period for pilots whose report time is between 7 a.m. and 12:59 p.m. (home base or wherever they are acclimated), similar in fashion to why the FDP is longer in the daylight hours. Likewise, just as the FDP is shorter in the evening and early morning hours, the flight time should also be further restricted for those who report between 8 p.m. and 4:59 a.m. ALPA's policy incorporates both of those changes to the decades-old limit of 8 hours.

Extensions/reductions

Life in the real world must acknowledge extensions to FDP and reduced rest. The new ALPA policy says FDP may be extended by as much as 2 hours, while rest may be reduced by 1 hour. However, ALPA says extension/reduction can not occur on consecutive duty/rest periods, and can only occur twice in a 168-hour (7-day) rolling window. Moreover, the captain has control of extension/reduction.



Capt. Don Wykoff (Delta), ALPA's executive administrator and chairman of the Association's Flight Time/Duty Time Committee, gives the Committee's presentation.



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Cumulative fatigue

To minimize cumulative fatigue, ALPA's policy calls for limiting flight duty to 60 hours in any 168 consecutive hours (7 days) and 190 hours in any 672 consecutive hours (28 days). Overall duty should be limited to 65 and 200 hours, respectively, in those periods. Flight time should not exceed 100 hours in any 28-consecutive-calendar-day period and 1,000 hours in any 365 consecutive calendar days.

Augmentation

While ALPA policy emphasizes that the best way to deal with flight crew fatigue is to replace the flight crew with a fresh crew, this is not always possible, particularly on long-range international flights. Augmentation thus becomes the reasonable method to extend the FDP. ALPA's limit for maximum FDP on augmented flights ranges from 11:45 to 18 hours, based on a matrix that accounts for time of start, total number of pilots, and type and quality of the onboard rest facility.

Reserve

Pilots on reserve will be pleased to know that the ALPA policy includes clear definitions of long call, short call, reserve duty period, and reserve availability period (RAP), plus provisions—and limitations—for shifting RAPs. "The goal of the reserve section of the policy is to provide predictability and limits to protect rest and alertness while also providing operational flexibility," Wykoff explains. ALPA's new policy calls for limiting maximum flight reserve duty period (i.e., total of time available to be called plus actual FDP) to 13-16 hours, based on time of start of RAP (according to the time zone of home base or where the pilot is currently acclimated) and number of flight segments.

To view the entire new ALPA policy, visit ALPA's members-only website and use the drop-down Committees menu at the top of the page to select Flight Time/Duty Time. [➔](#)