



# FAR 117 *FastRead*

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Welcome to the first ARW MEC FAR 117 *FastRead*. With the new flight-time/duty-time (FTDT) regulations scheduled to go into effect on Saturday, Jan. 4, 2014, we wanted to break them down in an easy to digest format so that you can better understand these new regulations and remain in compliance. This week, we're going to provide an overview of the rule, and discuss some of the concepts and definitions contained within.

This rule, as you know, amends the FAA's existing flight, duty, and rest regulations applicable to certificate holders and flightcrew members operating under 14 CFR Part 121. It recognizes the universality of factors that lead to fatigue in most individuals and regulates these factors to ensure that flightcrew members in passenger operations do not accumulate dangerous amounts of fatigue.

Fatigue threatens aviation safety because it increases the risk of pilot error that could lead to an accident. The new requirements eliminate the current distinctions between domestic, flag and supplemental passenger operations. The rule provides different requirements based on the time of day, whether an individual is acclimated to a new time zone, and the likelihood of being able to sleep under different circumstances.

One of the regulatory concepts that this rule introduces is the restriction on flightcrew members' maximum Flight Duty Period (FDP). In creating a maximum FDP limit, the FAA addressed three conditions: First, flightcrew members' circadian rhythms were addressed because studies have shown that flightcrew members who fly during their window of circadian low (WOCL) can experience severe performance degradation. Second, the amount of time spent at work has been taken into consideration because longer shifts increase fatigue. Third, the number of flight segments in a duty period was taken into account because flying more segments requires more takeoffs and landings, which are both the most task-intensive and the most safety-critical stages of flight. To address these concerns, the FAA adopted a table limiting the maximum FDP based on the time of day and the number of segments flown during the FDP period - this is known as Table B. Actual time at the controls (flight time) is limited to 8 or 9 hours, depending on the time of day that the FDP commences - this is known as Table A.

**Important Concepts and Definitions**

*Fitness for Duty* - FAR 117 places a joint responsibility on the certificate holder and each flightcrew member. In order for the flightcrew member to report for an FDP properly rested, the certificate holder must provide the flightcrew member with a meaningful rest opportunity that will allow the flightcrew member to get the proper amount of sleep. Likewise, the flightcrew member bears the responsibility of actually sleeping during the rest opportunity provided by the certificate holder instead of using that time to do other things. The consequence of a flightcrew member reporting for duty without being properly rested is that he or she is prohibited from beginning or continuing an FDP until he or she is properly rested.

**Each flightcrew member must report for any flight duty period rested and prepared to perform his or her assigned duties. Both pilots will sign the dispatch release indicating their fitness for flight.**

*Flight Duty Period (FDP)* - A period that begins when a flightcrew member is required to report for duty with the intention of conducting a flight, a series of flights, or positioning or ferrying flights and ends when the aircraft is parked after the last flight and there is no intention for further aircraft movement by the same flightcrew member. A FDP includes the duties performed by the flightcrew member on behalf of the certificate holder that occur before a flight segment or between flight segments without a required intervening rest period.

*Rest Requirements* - Before a flightcrew member may accept any assignment to a FDP or reserve, he or she must have had a 10 consecutive-hour rest period, including a minimum 8 **uninterrupted** hours of sleep opportunity immediately preceding the FDP or reserve assignment. Before beginning any reserve or FDP assignment, the flightcrew member must have received a 30 consecutive hour rest within the past 168 consecutive hours that precedes the beginning of the FDP.

**It is up to the individual crew member to determine if they have received an 8 hour uninterrupted sleep opportunity.**

*Reserve Availability Period (RAP)* - A duty period during which a certificate holder requires a flightcrew member on short call reserve to be available to receive an assignment for a flight duty period.

*Lineholder* - A flightcrew member who has an assigned flight duty period and is not acting as a reserve flightcrew member.

**Lineholders are never converted to reserves; however under certain circumstances, their duty day may be determined by utilizing the Reserve Availability Period formula.**

*Acclimated* - A condition in which a flightcrew member has been in a theater for 72 hours or has been given at least 36 consecutive hours free from duty.

*Theater* - A geographical area where local time at the flightcrew member's flight duty period departure point and arrival point differ by more than 60 degrees longitude - the area between the East and West Coasts of the United States does not exceed 60° longitude.

**All of Air Wisconsin flying at the current time will be within one theatre, so you will always be acclimated.**

*Window of Circadian Low (WOCL)* - A period of maximum sleepiness that occurs between 0200 and 0559 during the physiological night.

## Discussion

Some of the new terminology of the FAR 117 rules has caused some confusion. One area of concern is when a lineholder is assigned to short-call. This does not mean the pilot is now a reserve.

In the old days, if you had an overnight in MKE and the next day the airplane was still in the hangar then Crew Scheduling would call you to adjust your check-in time and let you stay at the hotel longer. This is no longer the case. The only way they can call you now to change your check-in time (if you are not given 10 hours of rest) is to put you on short-call reserve. The reason for this is because FDP is based on scheduled report time and not actual report time. In order to change your check-in time, they put you on short-call reserve. They call you at 0600 to tell you your plane will not be ready till 1000. You are now on short-call reserve, and you fall under the short-call reserve requirements. This means that your FDP is not based solely on the table but it is now RAP+FDP limit (Table B + 4 hours or 16 hours whichever is less). So your RAP starts at 0600 when they called you to adjust your check-in time. If your FDP is supposed to be 10 hours then your RAP is going to be 14 hours (table B plus 4 hours). Say your FDP was 14 hours then your RAP would be 16 hours because that would be less than  $14+4=18$  hours.

If they called you the night before and you would have 10 hours of rest after this call and said the plane will not be ready tomorrow at 0600 and for you to show at 1000 then you would not be put on short call reserve. Your FDP would be based solely on Table B.

That's it for this first overview of the new flight and duty time regulations. We will continue to explore the concepts and other issues associated with the new rule each Monday throughout December. Below is a schedule of topics that will be covered:

- Dec 9 Cancellations, Extension, Reroutes, Junior Mans, and the FDP
- Dec 16 Reserves and the RAP
- Dec 23 CBA and FAR 117
- Dec 30 Cumulative Limits & Rest

It's imperative for you to understand how these rules work *before* they are implemented. Don't forget to download the ALPA FTDT Guide along with Tables A & B. The guide was updated recently to correct some information that was contained in the brochure's first edition. [Download the revised edition here.](#)

Also, to answer your questions, we'll be holding conference calls: Mark your calendar and plan to join members of your MEC and Scheduling Committee for the all-pilot calls on Dec. 15 and Jan. 2; both of these calls will be held from 2000 to 2100 Eastern time. To participate, dial **1-888-363-4734**, and enter **6975113** for the access code.

There will also be all-reserve pilot calls on Dec. 20 and Jan. 3, each from 2000 to 2100 Eastern time. Simply dial **1-888-363-4734**, and enter **6975113** for the access code to participate.

Lastly, if you haven't done so already, download the ALPA Part 117 app. It includes a tutorial that guides pilots through inputting flight times and calculating the length of a duty day. The app is available to both Android and iPhone/iPad users to help members determine their legality on a daily and monthly basis to be in compliance with FAR Part 117.

- Android users can [download the app here.](#)
- iPhone users can [download the app here.](#)