



FAR 117 *FastRead*

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One of the biggest changes to reserve life per Part 117 is going to be after a trip has concluded. According to Part 117, rest begins when a pilot is released from duty, and this release occurs when the plane blocks in at the end of the Flight Duty Period (FDP). Though legally you will be released from your FDP, per our collective bargaining agreement (CBA) you will still be required to contact Crew Scheduling within 15 minutes to be formally released. Once released from your flight duty period immediately upon blocking in, just like a line holder, a reserve is entitled to a 10-hour rest period before reporting for another FDP or Reserve Availability Period (RAP). This prevents Scheduling from assigning you additional flying once you have blocked in on your final flight. However, this does not prevent them from assigning you a deadhead to stage a pilot for another overnight. Deadheading prior to flying is part of the FDP while deadheading that is not followed by flying is not part of the FDP.

A few examples:

1. You depart ROC for PHL on the last scheduled leg of your pairing. While enroute, Scheduling ACARS you requesting that you call them upon reaching PHL. After you block-in in PHL, your FDP has concluded you are not legally able to accept additional flying and you require 10 hours of rest prior to commencing your next FDP or RAP.
2. Your last two flights for the day are a ROC turn out of PHL. After departing PHL on the first leg, Scheduling sends you a message via ACARS with an additional flying assignment (a DCA turn) to begin after you arrive back in PHL. Assuming you are fit to fly and have not exceeded any other limitations, this is legal, as you never went to rest and you are in your FDP when the flying assignment was given.
3. You arrive in PHL after the last leg of your pairing. After deplaning, you contact Scheduling to get released, and they opt to put you on a 60-minute airport call out. Soon afterwards, they call to let you know of a deadhead to an overnight, or a taxi reposition from A-2 to the F-Terminal. This is legal because you are not operating an aircraft with the intention of flight, and the deadhead and taxi reposition are therefore not considered part of your FDP.

A second potential change to reserve life under Part 117 would be having a reserve day split. This is not to be confused with a Split Duty Period (a flight duty period that has a scheduled break in duty that is less than a required rest period). Rather, potentially being released early in the day, being put on a 10-hour rest period and then having to operate a flight later that day. This is legal, although it may not be prudent and is most certainly fatiguing in nature. Prior to every leg, you should still do a self-assessment to determine whether you are fit for duty. If you feel it not to be within the best interest of safety then by all means call out fatigued.

The following are a few condensed definitions and rules that apply to reserves along with Tables A & B (for the rest of this discussion, "certificate holder" means the Company):

Airport/standby reserve: A defined duty period during which a flightcrew member is required by a certificate holder to be at an airport for a possible assignment. (This applies to our ready reserves.) For airport/standby reserve, all time spent in a reserve status is part of the flightcrew member's FDP.

Short-call reserve: A period of time in which a flightcrew member is assigned to a RAP (essentially, all of our regular reserves). This RAP may not exceed 14 hours.

Long-call reserve: Prior to beginning the rest period required by § 117.25, the flightcrew member is notified by the certificate holder to report for a flight duty period following the completion of the rest period. (We don't have any dedicated long-call reserves; however, the closest thing we could consider would be a line holder with a relief line and LC days).

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. (What we refer to here as "times.")

Example:

A reserve pilot is assigned by Crew Scheduling to begin his next RAP at 0430 the following day, but is not assigned a trip at that time. The reserve pilot must be off duty by 1830 because the RAP may not exceed 14 hours.

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. 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. Examples of tasks that are

part of the FDP include deadhead transportation, training conducted in an aircraft or flight simulator and airport/standby reserve, if the above tasks occur before a flight segment or between flight segments without an intervening required rest period.

Once a Trip Has Been Assigned

For an unaugmented operation (all AWAC operations), the total number of hours a flightcrew member may spend in a flight duty period and a reserve availability period may not exceed the lesser of the maximum applicable flight duty period in Table B of this part plus 4 hours, or 16 hours, as measured from the beginning of the reserve availability period.

Examples:

You receive 04:30 times, and Crew Scheduling calls you at 06:45 for a 08:45 show time with 2 legs. Consulting Table B would yield a maximum FDP of 14 hours. Now, find the most restrictive end time: 14 hours (Table B) + 4 hours = 18 hours. This exceeds 16 hours and doesn't work. In this case, 16 hours would be the longest you could work and starting at your RAP of 04:30 would give you a finish time of no later than 20:30. Remember, this is Part 117 legal though not ARW CBA contractually compliant - look at the Hours of Service section in your contract.

Using the same times but an earlier show, let's say 04:45 with 2 legs would look something like this: 10 hours (Table B) + 4 = 14 hours. This is more restrictive than 16 hours (maximum duty day), so 14 hours from the start of your RAP of 04:30 would yield a finish time no later than 18:30.

Flight Extensions

The pilot in command (PIC) and the certificate holder may extend the maximum flight duty period permitted in Tables B or C of this part up to 2 hours. The PIC and the certificate holder may also extend the maximum combined flight duty period and reserve availability period limits specified in § 117.21(c)(3) and (4) of this part up to 2 hours.

After consulting with the rest of the crew, the PIC is NOT REQUIRED to accept the extension. This is again going to be predicated upon determining if it's going to be safe to do so and everyone is still fit for duty.

Cumulative Duty Limitations

Gone are the old limitations (8 in 24, 30 in 7, 100 hours per calendar month, 1000 hours per

calendar year). Part 117 limitations are based on a sliding window and are much more dynamic:

- 100 hours in any 672 consecutive hours, or
- 1,000 hours in any 365 consecutive calendar day period.

Also, no certificate holder may schedule and no flightcrew member may accept an assignment if the flightcrew member's total FDP will exceed:

- 60 flight duty period hours in any 168 consecutive hours, or
- 190 flight duty period hours in any 672 consecutive hours.

Correction

In the last issue of the FAR 117 *FastRead*, we unfortunately made an error in one of the examples. For the second example in which the crew was still at the hotel but not able to receive rest prior to their FDP we gave the following explanation:

You are shifted into short-call reserve. Your new report is at 0700. Using the chart, we find that the max duty day for 4 legs starting at 0430 (original report) is 10 hours. If we add 4 hours to that, it is less than 16 hours, so we don't have to worry about that part of the rule. Just add the 10 hours to the 0700 show for a drop dead time of 1700

This is incorrect. The max FDP should be calculated based off of the new show time of 0700, not the original show time of 0430. This would give you a max FDP of 13 hours, which ends at 2000. The latest your FDP could go without an extension is 2000. With an extension, the latest you could go is 2030 because the FDP limit plus 4 hours is 17 hours, but you cannot ever exceed 16 hours. 0430 plus 16 hours is 2030.

Many thanks to Charlie Mader for catching this error. We apologize for any confusion it may have caused. If you have questions about any of the information provided in these FAR 117 *FastRead* or about the new rules in general, please email us at ARW117Questions@alpa.org.