

ALPA and A4A Flight-Time/Duty-Time Seminar

**Fatigue Management:
Best Practices and Lessons Learned**

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535 Herndon Parkway
Herndon, VA 20170



**Air Line Pilots
Association, Int'l**



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Extensions: For Something That Happens so Little, Why the Big Fuss?

- **DISCLAIMER: THE FOLLOWING MEMO WENT OUT TO A REGIONAL PILOT GROUP WITHIN THE LAST YEAR. THE ACTUAL MEMO HAS BEEN DEIDENTIFIED IN THE INTEREST OF GENERATING DISCUSSION.**



All,

To Extend or Not Extend.....

So, we have been operating in the world of FAR 117 now for over 3 years and it has been a fairly smooth transition from the ole 121 days (reduced rest nights of 8 hrs., no behind the door rules and no restrictions on duty periods, just to name a few!). I think we can all say that some goodness came out of the new regulation with additional minimum rest requirements, a scientific method behind acceptable total flight hours and duty hours per day based on circadian rhythm studies. The whole purpose of 117 was to address fatigue and “fit for duty” time. While these changes indeed were positive for the pilot and the industry, it still has some provisions that, if not evaluated properly and smartly, can create operational difficulties that effect passengers, our peers, our company, performance and relationships with our major partners. I’m talking about flight duty periods (FDP) and the extensions associated with them.



So, what is the purpose of an extension? Simple...sometimes things happen in the operation that push our days longer than anticipated. Sometimes the drivers can be weather, ATC reroutes, ground delays, maintenance issues or some of our peers feeling ill. Prior to FAR 117 being published, the FAR 121 days never allowed both crew and company to ensure that they were fit for duty and not fatigued once we approached the end of a long day. Part 121 just had a maximum day that was “legal” to operate within (16 hours total!). The only way for a pilot to even consider not capable of the 16-hour day was calling out fatigued



With the enactment of FAR 117, the FAA determined, based on report time and number of legs operated in a day, what the scientific data showed was an acceptable number of hours of duty BUT it also determined that we could operate longer, as long as we were all in agreement (both company and crew) that the additional time was within the pilot's capability based on how they felt to continue operating. I.e. an Extension.



So, you may be asking yourself, why are we mentioning this? It's simple... we just wanted to bring some awareness to the acceptance rate of our extensions and some of the feedback from the pilots that we're getting. With a 117 regulation that all airlines have to comply with you would think that rate wise we would all be the same. But contrary, if we looked at the rates of the "X" Carriers and "Legacy Partner", we seem to have a totally different idea on what an extension is for. Take a look at the table below and the decline rates.

| | |
|-----------|-------------|
| Airline A | 4 % decline |
| Airline B | 5 % |
| Airline C | 10 % |
| Airline D | 10 % |
| Airline E | 15 % |
| Airline F | 50 % |



As you can tell, we seem to have the largest gap between all of the other carriers. So, the real question is why? When comparing schedules, work rules, demographics and aircraft, we are operating in a very similar manner as our competition. We do know that there are times when a crewmember won't extend for various reasons other than fit for duty issues/fatigue. The question is why?



This leads me to my final point. In the spirit of data collection, we must figure out why our carrier seems to be trailing the other carriers when it comes down to acceptance of extensions. With that said, I'm asking all crewmembers to please fill out the "117 Non-Concurrence form" anytime you decline an extension request. You can find the link to this form on the Flight Ops Home page on the right side "Quick Links". This form was originally put on our page as a way to collect data on any extension refusal and unfortunately hasn't been used much. As was stated when 117 was rolled out, any time an extension is refused, the form must be filled out to get paid



Thanks for listening and helping our airline get the data to make a difference for our carrier, our partners, our peers but most importantly, our customers. I can't always guarantee that extensions will get treated the same in the future but this will be a good start.

