Fatigue Risk Management Plan
Best Practices
Moving Forward

- Captain Don Wykoff, Chairman, Flight Time/Duty Time Committee, Air Line Pilots Association
- Jim Cacciacarro, Manager, Flight Operations Fatigue Risk Management United Airlines
- Captain Jim Mangie, Director, Delta Air Lines Pilot Fatigue Program
- Patrick Holyfield, IBT Local 357 Safety Chairman
RAH BACKGROUND

- Bases: MCI, ORD, IND, CMH, PIT, PHL, EWR, LGA, DCA, MIA
- Most routes east of DEN. Large percentage of flying through East Coast, presenting operational challenges.
FRMP BACKGROUND

- Company and Operational - pay protection and no affect on attendance policy
- Personal - no pay protection and subject to attendance policy
- No process for resolution of disagreements
- Varying level of pilot distrust for program. Anecdotal feedback from Union
NEED FOR NEW PROGRAM

- “Disincentives” leading to pilots operating aircraft in a fatigued state
- Union stance that fatigue the greatest safety risk to airline
- Cleveland incident in 2007, fatigue a contributing factor
NEED FOR NEW PROGRAM

- Management/Leadership desire for change
- ASAP & FOQA in good shape, FRMP the outlier
- Pilot Group’s perception that the program is no good
  - Belief most reports coded as Personal
LOBBYING FOR CHANGE

- Unofficial process of Chief Pilot relief
  - Varied response between certificates

- Discussions with management in Safety Department and Senior Leadership

- Trusting relationship between Union and Leadership
  - Open and frank discussion

- Main barrier to change was the potential for program abuse
One particular pilot as the outlier

Hard sell that through Union intervention, abuse could be curtailed

October 2015 CBA- references to Personal Fatigue of “environmental nature”
FATIGUE SURVEY

- Company created with input from Union
- Confirmed anecdotal assertions from Union
- Some shocking feedback and admissions from pilot group
- Confirmed need for a new program
FRMP DESIGN PROCESS

- Industry research, identification of best practices
- Safety Committee Chairman networking with peers
- SCC and three Union Fatigue Representatives created Memorandum of Understanding
- Back and forth with Company, finally coming to mutually agreeable document
FAA APPROVAL

Review Process:
AFS-200 will review the content of the air carrier's draft FRMP to ensure the plan addresses each element required for the FRMP to be acceptable. The air carrier may elect to incorporate more information in its FRMP than currently outlined in the FRMP elements; however, this information must not conflict with the required FRMP elements.

This guidance was followed in the development process but we were still denied by AFS-200 until we removed the sections that were outside of the required FRMP elements.

InFO 10017 provides guidance for developing an FRMP

http://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info

An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.

Subject: Fatigue Risk Management Plans (FRMP) for Part 121 Air Carriers – Part Two
MOU IMPROVEMENTS

- New Root Causes- “Personal No Fault”, “Personal at Fault”
  - Events in control and not in control of pilot
- Personal No Fault pay protected and no attendance policy implication
- Pay protected immediately after call
- Separation of Fatigue related occurrences from Bonus programs
MOU IMPROVEMENTS

- Creation of Fatigue Executive Review Team
- Creation of Fatigue Action Review Team
- Created structured process for intervention and usage of Professional Standards Committee
- Reporting timeline increased. Addition of 48 hours from release into a day off
MOU IMPROVEMENTS

- Union notification of Fatigue call off
- Ability of submitter to appeal ruling within 14 days
- FRMP coverage of ANY duty, not just flight
- Ability to report safety concerns via Fatigue program, similar to ASAP
- References to FAA part 117 and new IBT CBA
Fatigue Executive Review Team

- Replaces informal appeal process to Chief Pilot
- Safety Committee Chairman, Director of Safety, Chief Pilot
- All Personal At Fault reports forwarded from FMRT
- Pay implications and occurrence/attendance policy application
- De-identified information with goal of eliminating bias
Primarily vehicle for combatting program abuse

**FERT Options:**
- PSC Involvement
- Submitter referral to EAP
- Training in rest management/fatigue prevention
- Coaching/counseling in use of FRMP
- Resubmission of report with additional information
- Further action at the discretion of SCC
- No action

**FMRT provided results**
- May issue recommendation if disagreement
RESOLUTION OF DISPUTES

- FMRT disagreement is forwarded to Safety Committee Chairman and Director of Safety

- Further disagreement escalates to Vice President of Safety
OUTREACH TO PILOT GROUP

- Duty Pilot
  - Reminder to complete report within timeline
  - Answer questions and provide feedback
  - Company request to reach out to pilot in cases of perspective fatigue

- Social Media

- Company Memo program (Comply365)

- Plans to hold Crew Room visits

- Whiteboard Video
THE FUTURE

- Sleep study
- Monthly conference calls
- Fatigue Modeling Software
- Second Fatigue survey in early 2017
  - Feedback from pilot group positive
    - Optimistic that new program is effective
  - Operational impact on fatigue call rate thus far
If you have questions or would like more information, email us: frmp@local357.org