



AIR LINE PILOTS ASSOCIATION INTERNATIONAL

THE WORLD'S LARGEST PILOTS UNION • WWW.ALPA.ORG

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January 15, 2013

Dear Representative:

On behalf of 51,000 professional airline pilots represented by the Air Line Pilots Association, International (ALPA), I write in support of HR 182, the Safe Skies Act of 2013. This legislation will ensure that all commercial pilots are afforded sufficient rest and will improve aviation safety.

In 2010, Congress appropriately recognized the effect of pilot fatigue on airline safety and directed the Federal Aviation Administration (FAA) to issue science-based flight-and-duty time limitation rules and minimum rest requirements for airline pilots. Per that Congressional mandate, the Federal Aviation Administration (FAA) released final regulations (FAR 117) to address pilot fatigue for passenger airlines on December 21, 2011. Unfortunately, these rules excluded cargo airline operations from mandatory compliance. ALPA supports the fundamentals of these regulations; however, FAR 117 clearly does not meet the One Level of Safety standard that we have advocated for decades. While the new FAA flight and duty time rules are a significant improvement over the antiquated rules established up to five decades ago, by excluding cargo operations, overall aviation safety is at risk.

Fatigue affects individuals the same way and all pilots and airline operations should be treated equally regardless of payload or flight mission. National Transportation Safety Board Chairman Deborah Hersman expressed disappointment about the exclusion of cargo operations, saying "A tired pilot is a tired pilot, whether there are 10 paying customers on board or 100, whether the payload is passengers or pallets."

HR 182 directs the FAA to apply the flight, duty and rest requirements (FAR 117) to all-cargo operations in the same manner as they apply to passenger operations. Cargo pilots fly the same routes, in the same airspace, and into the same airports as passenger airlines. Moreover, cargo operations often take place at night or early morning for express delivery of packages, increasing pilot fatigue as proven by modern science.

Pilot fatigue is not dependent on the type of operation—it is a universal problem. There is simply no reason for all-cargo carriers to operate under a different standard of safety.

All airline passengers, and all airline pilots, deserve one level of safety. We urge you to cosponsor HR 182.

Sincerely,

Lee Moak
President