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1625 Massachusetts Avenue, N.W. • Washington, D.C. 20036 • 202-797-4033 • FAX 202-797-4030

All Airline Pilots Are Human When It Comes to Fatigue

Safe Skies Act Will Promote One Level of Safety Across U.S. Airlines

Passenger and all-cargo airline pilots share one constant: the pilot is always human. Fatigue affects all humans in the same way. Compelling science and common sense make clear that all those who depend on air transportation in the United States will benefit from a standard set of regulations that equally protect all airline pilots from fatigue, regardless of what they fly in their aircraft. However, the FAA's 2011 science-based flight- and duty-time regulations (FAR 117) apply only to passenger pilots, *excluding pilots who fly only cargo*.

The United States has the most developed air freight system in the world, and cargo-only flights make up almost 10 percent of domestic air carrier operations. Cargo pilots fly the same types of aircraft, on the same routes, through the same airspace, and into the same airports, as pilots who fly passengers. Leaving pilots who fly only cargo out of FAR 117 is a serious safety concern and affects everyone who relies on safe air transportation. *Congress should pass H.R. 182 and extend the FAR 117 fatigue rules to **all** pilots.*

- **Current Rules Fail to Protect All-Cargo Pilots**

Current fatigue rules that apply to all-cargo flight operations were developed more than 50 years ago. These fatigue regulations are outdated and not science-based.

- **Cargo Pilots Frequently Fly All Night, Increasing Fatigue Risk**

Many cargo pilots begin their work at night in the 9 p.m. range. Under existing rules they could still be sharing the same airspace with the passenger carriers at 1 p.m. the next day. Fatigue science clearly shows that time awake greatly affects performance. The new FAR 117 rules use this science to tailor duty lengths to the time of day a pilot starts work. Despite this, current rules for cargo pilots allow for **16 hours of duty**, regardless of the time a pilot reports for work. Cargo pilots, who fly through the human performance low period of 2–6 a.m., greatly need the protections of FAR 117.

If covered by FAR 117, cargo carriers will still be allowed to continue night operations, and normal night flights will not be disrupted. These flights would just be operating under FAA-determined safety standards.

- **There Is No Standard for Rest Facilities on Cargo Aircraft**

There are currently no rules governing the **quality** of rest facilities on cargo aircraft, and therefore rest facilities vary widely among air carriers. FAR 117 corrects this deficiency and should be applied to all cargo carriers.

Furthermore, exempting cargo carriers from FAR 117 creates an unlevel playing field by penalizing the carriers that do the right thing and provide fatigue mitigations for their pilots. Some carriers have spent millions of dollars to build sleep facilities, and others have done nothing. Standardized rest facilities provided by FAR 117 are needed for cargo pilots.

- **All-Cargo Airlines' Scheduling, Work Hours, and Work Rules Vary Widely**

The nature of the air cargo industry can cause long duty days with relatively fewer flight hours. Hours flown is a poor metric for fatigue assessment, as the science says "time since awake" is as critical for performance as the total time on task.

- **Statistics Show Fatigue Is a Factor in Airline Accidents**

While all-cargo airlines have reduced their overall **accident rate, the rate for these operations is four to eight times higher than for passenger airlines**, according to information released at the National Transportation Safety Board's Cargo Airline Safety Forum held in 2004.

- **Safety Should Come Before Economics in Combating Pilot Fatigue**

The FAA has acknowledged that cargo pilots were excluded from the rule only because an economic analysis placed a lower dollar figure on the lives of a cargo pilot crew than on the amount of money it would cost a cargo shipping company to ensure the safest possible operations.

Given that cargo planes share the same airports and airspace as passenger planes, this sense of priority not only puts cargo flights at risk, it threatens the travelers and crews aboard passenger flights as well as the communities that surround airports and lie below major flyways.

The Safe Skies Act of 2013 (H.R. 182) requires the Department of Transportation to ensure that the FAA's science-based flight- and duty-time regulations and minimum-rest requirements apply to every airline pilot, regardless of whether he or she flies passengers or cargo. Achieving one level of safety across the U.S. air transportation system would benefit all of us. To cosponsor the Safe Skies Act of 2013, contact Chris Berardini in Rep. Grimm's office at Chris.Berardini@mail.house.gov or Mark Copeland in Rep. Bishop's office at Mark.Copeland@mail.house.gov.

For more information, contact the Air Line Pilots Association, Int'l, at 202-797-4033, or visit ALPA on the web at www.alpa.org.