

Fatigue Risk Management Plan

Best Practices

Moving Forward

- Captain Don Wykoff, Chairman, Flight Time/Duty Time Committee, Air Line Pilots Association
- Jim Cacciaccarro, 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

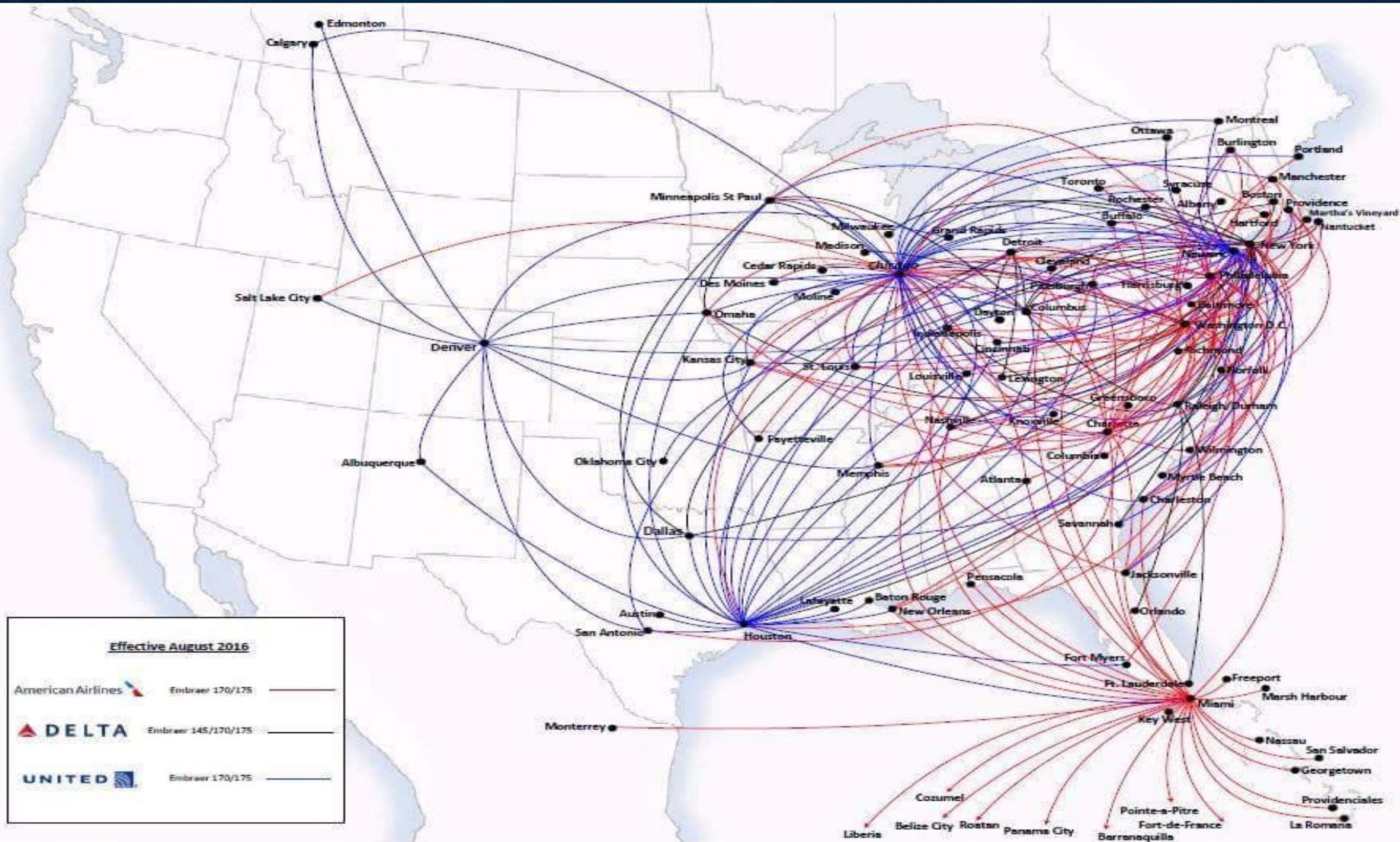


CHALLENGES AND SUCCESS IN FRMP REVISION



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RAH BACKGROUND



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

LOBBYING FOR CHANGE



- 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



U.S. Department
of Transportation
**Federal Aviation
Administration**

InFO

Information for Operators

InFO 10017
DATE: 8/19/10

Flight Standards Service
Washington, DC

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



QUESTIONS/FEEDBACK



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FATIGUE RISK MANAGEMENT PROGRAM (FRMP) MEMORANDUM OF UNDERSTANDING

BETWEEN REPUBLIC AIRLINES

and the

INTERNATIONAL BROTHERHOOD OF TEAMSTERS
LOCAL 357

Revision 5

July 1, 2016

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