

## Pilot Fatigue

Pilot fatigue has been a major safety issue for ALPA since it was founded in 1931 and it has been particularly onerous during the difficult years since 9/11.

The financial crisis in the airline industry has brought bankruptcies and concessionary contracts which have resulted in pilots being required to fly up to the legal limits without receiving adequate rest. We receive daily reports of scheduling that causes pilots to be virtual “zombies.” The domestic flight and duty rules were last amended in 1985 with the promise that the FAA would revisit these rules in two years. Twenty-five years later we are still waiting to review them.

The current rules for International and Supplemental Operations were promulgated in 1954 when the DC-3 aircraft was state-of-the-art. At that time, it was not uncommon to carry a radio operator and mechanic on the aircraft. Today, the Airbus 380 airplane carries 600+ passengers 8,200 miles at a speed of 560 miles per hour. Times and equipment have changed but the flight and duty time rules have not. They were not designed to address our modern environment and equipment.

Since 1989, the Safety Board has issued more than 70 fatigue-related safety recommendations which were the result of major accident investigations, special investigations, or safety studies that identified operator fatigue as a factor. This includes more than 15 significant accident reports or studies concerning aviation operations conducted under Parts 91, 121 and 135. Pilot fatigue has been on the Safety Board’s list of Most Wanted Transportation Safety Improvements since the list’s inception in 1990.

There is universal agreement that there is an urgent need for modern flight time regulations and the FAA needs to take immediate action to revise the current rules. Further delay in issuing proposed new rules is simply unacceptable.

This brings us to “what should a modern flight time regulation prescribe?” There are three basic principles for a new rule. One, it must be based on science. This is mandated by ICAO in their new standard which the US is obligated to follow. Two, it must apply equally to all operations: domestic, international and supplemental. There is no basis for any “carveouts” for air cargo or charter operations. Three, it must include the ability for air carriers to transition to a Fatigue Risk Management System, or FRMS.