European Union Aviation Safety Agency

FAQ n.47639

FAQs:

ORO.FTL, Part-ORO, Air Operations, Regulations

Question:

Awake time CS FTL 1 225 (b)(2): Who is responsible for making sure that the 18h are not exceeded? The crew member or the operator? Can the operator fully transfer the responsibility to the crew member?

Answer:

The operator is only required to have established such procedures (control mechanisms) so as to prevent situations where the combination of standby and FDP would lead to more than 18 hours awake time.

18 hours awake time is mentioned in the context of the combination of other-standby prior to an FDP and the FDP itself. A simple mathematical equation between the sum of the standby time and FDP, on the one hand, and the time awake on the other, is not possible to do, because the start time of the awake period is an unknown value i.e. the operator may be unable to verify how long a crew member has been awake.

It is reasonable for the operator to expect crew members to manage their rest and sleep opportunities during pre-duty rest periods and while on standby in order to be able to perform FDP.

The procedure and expectation for the crew to rest appropriately during their standby should also be included when training crew on FTL and fatigue management.
The following are examples of what an operator should consider when designing procedures:

- the duties and rest periods prior to the scheduled standby;
- the time of the day in which the rest period prior to the scheduled standby occurs;
- a minimum of 8 hours' sleep opportunity before or within the scheduled standby, during which the crew member is not disturbed;
- the length of the standby and the subsequent FDP;
- the time for post flight duties and for travelling to the suitable accommodation if away from home base;
- provision of training and advice to crew members

The NAAs are responsible for verifying that the above procedures have been established and

are effective.

Last updated:

12/07/2018

Link:

https://www.easa.europa.eu/en/faq/47639