

Tired of Fatigue

By Capt. Duane Woerth, ALPA President



"I'd be very pleased to work with you on pilot fatigue issues to see if we can't get someone to take a good, long look at that. Pilot fatigue is, in my opinion, more dangerous to any passenger than age is."—Sen. Ted Stevens (R-Alaska)

These powerful words came in response to a key part of testimony on the Age 60 Rule that I recently delivered to a Senate committee. Whatever your opinion on Age 60, we all know what a toll fatigue is taking on our profession. Here is what I said that prompted Sen. Stevens' commitment to ALPA:

"No safety rule is isolated from the rest of the real-world operating environment we face," I testified. "Bone-crushing pilot fatigue, and the mental errors it leads to, is still one of the largest threats to aviation safety. Sixteen-hour domestic duty days—even longer with more transpacific international operations—are facts of life for airline pilots. Irregular shifts, all-night operations, and significant circadian rhythm challenges all contribute to pilot fatigue.

"With all the contractual work rule concessions that have occurred since 9/11, a higher percentage of pilots are flying more hours and working more days with longer duty periods than at any other time in recent history. No matter what this committee or the Senate may decide to do with the Age 60 Rule, the current flight and duty time rules affecting pilot fatigue need to be enhanced, not weakened."

The pay and productivity hits of the last few years mean that our members are working at or near regulatory limits. The new contracts force pilots to work more days per month to reach their contractual hours, which increases fatigue, decreases quality of life, and contributes to stress.

Meanwhile, in an effort to slash costs further, airlines are continuing to reduce pilot staffing and are pushing the FAA to change its approach to flight and duty time limits so their pilots can fly more than we think is safe and healthy. Some airlines are even looking to increase flight time limits to enable domestic two-member crew coast-to-coast turns, West Coast-to-Hawaii turns, and some East Coast-to-Europe turns. Not only will this increase fatigue even further, it also will cost pilot jobs.

ALPA is gearing up to deal with this critical issue. We need to do everything we can to address fatigue in order to improve quality of life, protect jobs, and—above all—guarantee safety. Our approach must focus on three levels: pressuring Congress and the FAA to put more appropriate flight and duty time regulations in place, improv-



ing limits and scheduling procedures as part of our contracts, and forcing managements to live up to the agreements they have signed.

This month, I will focus on regulatory change. In my next column, I will lay out some ways we will force managements to be more accountable for the agreements they have signed. Here are the key recommendations that we have formally submitted to the FAA in a petition for rulemaking:

- **Maximum domestic, unaugmented-crew duty day of 12 hours.** Currently, no maximum is specified. As a result,

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16 hours is the *de facto* limit because of the requirement for a look-back rest of 8 hours.

- **Minimum rest of 10 hours, preferably at a hotel.** With the current 8-hour reduced rest, a pilot may get as little as 5 hours of sleep, once travel to and from a hotel, meals, and physiological needs are factored in.
- **Address circadian rhythm issues.** Back-side-of-the-clock operations pose significant fatigue issues. To address them, we could reduce duty times, limit takeoffs and landings, and credit deadhead time as duty time. Right now, a crew can deadhead from Chicago to Hawaii and then be assigned duty to fly the aircraft back to Chicago with no rest. That must change.

ALPA also submitted the above recommendations to the FAA long ago, but the FAA failed to address our issues. Over the years, the FAA has taken many half-hearted steps to paper over flight and duty time issues, including publishing a notice of proposed rulemaking in 1995, a notice that remains in limbo. Numerous FAA Aviation Rulemaking Advisory Committee working groups have worked on the issue and have concluded without resolution.

Now is the time to take this issue to a higher level, and that means Congress. I will soon follow up with key members of Congress to make sure that they know how tired we are of being tired.