



# FAR 117 *FastRead*

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## Part 117 Implementation - First Week Q&A

It's been a non-stop week...and it's only Monday! Thanks to all of the crews that have been flying this month; you've done a great job. The Company also did a good job handling all of the issues. Not only were there maintenance, weather, and ATC issues over the last several days, we have also been getting used to the new FAR 117 rules. Knowing how something is supposed to work and having it actually work that way are sometimes two different things, and right now, we're in a learning period with the application of this new rule. Our focus is on ensuring that our pilots understand the new rules and that Crew Scheduling is following them. To be successful, we need your feedback. If something doesn't feel right, let us know. There may be some parts of the new rules that are legal but just don't work realistically on the line. We need to know about these issues so we can track how often they happen and find out why they might not work. The following is a review of some of the more common questions that came up this week.

***Q: Can the Company extend my Flight Duty Period (FDP) period from Table B up to 30 minutes every day?***

A: Yes. The FAA has granted certificate holders freedom to extend the maximum FDP limits up to 30 minutes.

***Q. If the Company elects to utilize an extension, do they require crew approval beforehand?***

A: Whether an extension of up to 30 minutes requires crewmember consent has not yet been answered by the FAA. The question has been posed in writing to the FAA by ALPA and some carriers, and we await an answer. The carriers have argued that they need this to keep the operations running, and the pilots have stated that this blanket authority simply means that the Table B times are elongated by the 30 minutes. We await an FAA response. Until we receive the FAA interpretation on this question, we suggest that you accept the flying if you are fit to do so. We also ask you to email/call us and let us know it happened, and then file an ASAP on it so the FAA can see what is going on with their rules.

However, an extension over 30-minutes with expressed flight crew approval requires that the crew receive a 30 consecutive hour rest period to reset the Company's ability to again exercise this provision. Said differently, although a crew accepting a greater than 30-minute extension does not require a 30-hour rest

period immediately following the extension, they must receive the 30-hour rest period before they may accept another extension of greater than 30-minutes (Part 117.19, ALPA FTDT Q-24 / A-24).

Additionally, a split duty (CDO) assignment **cannot** utilize the 30-minute or the 2-hour extension provisions of Part 117.19 (ALPA FTDT Q 92 / A 92).

***Q: What if the crew determines one or both of the pilots is not fit to continue flying and to accept an extension (up to or greater than 30 minutes)—will the crew lose pay for any subsequent flight cancellation?***

A: No. It is required in the regulation that each pilot declares themselves fit for duty. If an extension is being requested of the crew, there is an operational reason for the Company to do so, which may result in an operational cancellation if the crew is unable to accept the extension. Therefore, the pilot(s) is pay protected for the original assignment.

***Q: How do I know when my FDP starts and ends?***

A: Part 117 Table B FDP. Please keep this table readily available and check it against your assigned flying for the day by noting your on-duty time and number of scheduled flight segments (legs). Keep in mind that the Crewtrack software used by the crew desk might not have an updated time for your new departure time when you have delays. It is better to call the crew desk if you are going to time out rather than wait until you are boarding or taxiing out then, when Crewtrack has been updated, you have to go back to the gate and cancel.

Flight duty period (FDP) means: “[A] period that begins when a flightcrew member is required to report for duty with the intention of conducting a flight, a series of flights, or positioning or ferrying flights, and ends when the aircraft is parked after the last flight and there is no intention for further aircraft movement by the same flightcrew member. A flight duty period would include deadhead transportation before a flight segment without an intervening required rest period, training conducted in an aircraft, flight simulator or flight training device, and airport/standby reserve.”

***Q: Does the 15-minute duty off count as a part of my FDP?***

A: No. This is a contractual provision, and it is not recognized as part of the FDP by the FAA. Be certain to subtract 15 minutes from “scheduled duty” time at the end of every day when reviewing your schedule in CSS or on your printed schedule. The time in CSS reflects our 15-minute duty off provision from the CBA, while your FDP ends when the aircraft is parked and there’s no other intention of flight.

***Q: Are we supposed to be scheduled for 10 hours behind the door at the hotel?***

A: No. The minimum amount of time off between flight duty periods under 117 is 10 hours. Within these 10 hours, you must have an 8-hour uninterrupted sleep opportunity. The 10 hours of rest

starts at release from duty. At ARW, this will usually be after the 15-minute duty off period following block-in. However, if these events begin to encroach or impact the 8-hour sleep opportunity, it is your responsibility to ensure that you have received a sufficient sleep opportunity. The 10-hour rest period does not include the 45-minute or 30-minute (deadhead assignment) pre-flight show-time or any other required pre-release duty after block-in such as obligatory maintenance or other reports.

***From The ALPA FTDT Guide: Q-69. Does the travel time to and from the hotel count as part of the 10- hour rest period?***

**A-69:** Yes. However, if the travel time would prevent an 8-hour uninterrupted sleep opportunity, the flightcrew member must advise the carrier and ensure they get the required 8-hour sleep opportunity.

***Q: What if the location of my scheduled overnight (RON) changes and I end up somewhere else and scheduled for 10 hours off?***

A: The 10-hour rest period begins when all duty has concluded. Ordinarily this will be 15 minutes after block-in on your last leg. If the Company keeps you on duty past that time (i.e. in order to find and assign you to a hotel for rest) then you have not started the 10-hour rest period until you have been released from that duty.

***Q: If I'm assigned a ferry flight and have not or will not fly a revenue flight in the same FDP, does the ferry flight(s) fall under 117 rules?***

A: No. In this case, since the Part 91 ferry flight segment does not occur during the same FDP as a revenue flight, it would not be subject to the flight, duty, and rest provisions of part 117 (Federal Register, Vol 78. March 5, 2013/ Pg 14167). However, all flight time incurred on behalf of the certificate holder, including ferry flying, is required to be recorded against the pilot's cumulative flight time limits under 117.23(a). If any revenue flying occurs before or after a ferry flight (in the same FDP), then all duty counts toward the FDP.

***Q: What if my flight departs the gate (intent to fly) and we receive a lengthy ground stop; then, we end up having to return to the gate because some passengers want off. Eventually the ground stop is lifted, we board back up and proceed to our scheduled destination—what is our duty time?***

A: All time from the original taxi under the aircraft's own power to the destination is counted as duty time toward FDP (Reference ALPA FTDT Guide Q-46 / A-46).

***Q. Can a flightcrew be given 30 hours of rest and required to fly into or past the 7th consecutive day?***

A. While this would be legal under Part 117, it is not allowed under our contract, which requires a calendar day off in domicile in every consecutive 7 days.

We will continue to publish answers to questions as they are received. If you have any additional questions, please email us at [ARW117Questions@alpa.org](mailto:ARW117Questions@alpa.org). We will answer them on an individual basis, as well as compile the most frequently asked questions to send out to the pilot group via an ARW MEC FAR 117 *FastRead* and Facebook.