

Dear Mr ....., dear Mr .....,

Thank you for enquiry.

OPS 1.1105 paragraph 2 regulates the use of FDP extensions in non-augmented crew operations.

These extensions can be scheduled as long as an operator follows all the conditions listed in subparagraphs 2.1 to 2.7.

A crew member's roster must clearly show which rotations have been subjected to the planned FDP extension in order to allow crew members to verify that all applicable provisions have been correctly implemented. This means that rotations in non-augmented crew operations cannot be highlighted as 'extendable' in the future. They must have already been planned with extensions as the maximum basic daily FDP can only be extended to 14 hrs twice in any seven consecutive days.

In scheduling the abovementioned FDP extensions, operators must also take into account the provisions of OPS 1.1090 paragraph 3, in particular those responsibilities referred to in subparagraphs 3.2, 3.3, 3.5 and 3.6 addressing the type, allocation and combination of duty and rest periods.

Commander's discretion cannot always be due as it is only allowable in case of unforeseen circumstances. Also, the commander's discretion cannot be applied to its full extent in combination with an already extended FDP: for ex. in non-augmented crew operations an extended FDP of 14 hrs cannot be increased by 2 hrs commander's discretion.

In any case, only a comprehensive analysis of an operator's established FTL scheme and its rostering practices could give an indication whether the overall safety requirements of Subpart Q are met.

Please note that Subpart Q of EU-OPS falls under the competence of the European Commission, therefore this reply has been drafted in coordination with the services of DG MOVE, Air Safety Unit.

Kind regards,

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