

Question: EU OPS 1.1105 paragraph 2 – “Extensions”.

Operators are allowed to plan two “one extra hour” extensions beyond the Maximum daily duty period (FDP).

FIT CISL believes that “extensions” are to be used only when there is no other way to roster crew activities within the maximum daily FDP. Some Operators assumes that a 14 hours twice a week FDP is due regardless of the kind of operation crews are involved in.

In addition, some rotations appear to be “stretched” just for Operators’ opportunity to complete network flights with less personnel than actually needed and required as [EUOPS 1.175 para g (1)]:

“The operator must satisfy the Authority that:

- 1. its organisation and management are suitable and properly matched to the scale and scope of the operation...”*

Moreover, according to EASA APPENDIX 1 TO OPINION 04/2012 chapter 6.3, “extensions” appear specifically referred to particular networks and flight patterns, where specific destinations as Canary Islands or Middle East from European metropolitan areas are impossible to reach from geographically opposite positioned Countries (UK vs Middle East).

FIT CISL understands and believes that “extension” in FDP has to be used only in some particular cases as for connecting particular far away destinations, or when aircraft is not equipped with rest facilities for in flight crew relief.

If a series of flights can be done within the maximum daily FDP, as for an “out – in” Home Base rotation, EUOPS 1.1105 paragraph 1 time limit must be applied and Operator must relief crew from exceeding the Maximum Daily Flight Duty Period.

FIT CISL believes that Subpart Q FTL is a SAFETY tool which grants passengers from crew fatigue. Some Operators refers to “extension” just as a rostering opportunity, where one extra Flight Duty Period hour is always due on a twice a week basis.

FIT CISL kindly requests to check the attached rotations for eventual illegal planning criteria:

Case 1: *(All times local – Crew Home Base VCE – Operator Home Bases FCO and VCE - Start of FDP in accordance of Operator Operation Manual – Post Flight Time assigned by Operator = 30 minutes)*

START OF FDP	FLIGHT	FROM	TO	DAY	DEP	ARR	FLT TIME	FDP	REST
06.25	1468	VCE	FCO	1	07.25	08.30	1.05		
	188	FCO	VIE	1	09.55	11.35	1.40		
	189	VIE	FCO	1	12.20	13.55	1.35		
	1391	FCO	GOA	1	17.20	18.30	1.10	12.05	22.30
17.30	D/H1390	GOA	FCO	2	18.15	19.15	0		
	1321	FCO	BLQ	2	21.25	22.30	1.05	5.00	11.40
10.40	1314	BLQ	FCO	3	11.25	12.25	1.00		
	404	FCO	FRA	3	15.55	18.00	2.05		
	407	FRA	FCO	3	18.45	20.40	1.55		
	1473	FCO	VCE	3	21.40	22.50	1.10	12.10	

In this rotation, DAY 1 has a scheduled daily FDP of 12 hours and 05 minutes Vs the 12.00 hours FTL of EUOPS 1.1105 – 1. Please notice that 3 hours and 25 minutes transit is scheduled at one of the Operator Home bases.

DAY 2 duty ends at 2300 local time (within the local night); 11hrs and 40 minutes rest period appears below the 12 hours for a proper pre duty rest on a extended FDP (10 + 2).

Operator believes that the increased pre duty rest requirements can be overruled with an increased post flight rest, as for subpara 2.6 of EUOPS 1.1105. In this case the requirement is fulfilled (4 hrs extra) since rotation ends at the end of the second extension on a 3 days roster e no other immediate duty is scheduled.

DAY 3 has a 3 hours and a half transit at one the Operator Home bases for a 12hrs and 10 minutes scheduled FDP.

FIT CISL believes that the crew could be either relieved or scheluded for other early arriving flights to remain within FTL on both day 1 and 3.

Furthermore, we believe that PRE duty rest is the key factor for safety in public transport operation. Allowing a “formal” extra 4 hours “after flight” rest at the end of the rotation, reduces day 3 last leg passenger safety margins against crew fatigue.

Case 2: (all times local – Crew Home Base LIN)

START OF FDP	FLIGHT	FROM	TO	DAY	DEP	ARR	FLT TIME	FDP	REST
08.05	170	LIN	AMS	1	09.05	11.05	2.00		
	171	AMS	LIN	1	12.15	13.55	1.40		
	7052	LIN	LCY	1	15.55	16.55	2.00		
	7053	LCY	LIN	1	17.25	20.25	2.00	12.20	

On this single day rotation, crew has a 2 hours transit at Home base.

FIT CISL believes that this FDP is “creative” and that 2 different crews have to be employed for this series of flights since relief in this case it is not only possible, at Operator Home base, but it is also due.

Extension appears to be applied just for Operator’s economical convenience and not as the passenger’ safety feature the Regulation is aiming for.

We’re looking forward to receiving Your opinion on this Operator’s rostering criteria soon.