

The Current Use of Controlled Rest

Our Panel

Doug Tweedlie - Air Canada

Brad Favors - Southwest Airlines

Stuart Beverage - Australian Pilot Association



Advocate

Cautious

Concerned

Committee.

FOR FURTHER INFORMATION CONTACT:
Dr. R. Curtis Graeber, Manager, Flight Deck Research Avionics/Flight Systems, Boeing Commercial Airplane Group, P.O. Box 3707, MS 33HH, Seattle, WA 98124-2207; telephone (206) 393-6688; fax (206) 477-0778.

SUPPLEMENTARY INFORMATION: The Federal Aviation Administration (FAA) established an Aviation Rulemaking Advisory Committee (56 FR 2190, January 22, 1991) which held its first meeting on May 23, 1991 (56 FR 20492, May 3, 1991). The Air Carrier Operations Subcommittee was established at that meeting to provide advice and recommendations to the Director, FAA Flight Standards Service, on air carrier operations, pertinent regulations, and associated advisory material. At its October 1, 1991, meeting (56 FR 46349, September 11, 1991), the subcommittee established the Controlled Rest on the Flight Deck Working Group.

Specifically, the working group's task is the following:

To determine the feasibility of preplanned rest in the cockpit during long-range flights and, if feasible, determine the criteria for the establishment of such rest periods.

The Controlled Rest on the Flight Deck Working Group will be comprised of experts from those organizations having an interest in the task assigned to it. A working group member need not necessarily be a representative of one of the organizations of the parent Air Carrier Operations Subcommittee or of

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Aviation Rulemaking Advisory Committee; Air Carrier Operations Subcommittee; Controlled Rest on the Flight Deck Working Group

AGENCY: Federal Aviation Administration (FAA), DOT.

ACTION: Notice of establishment of Controlled Rest on the Flight Deck Working Group.

Specifically, the working group's task is the following:

To determine the feasibility of preplanned rest in the cockpit during long-range flights and, if feasible, determine the criteria for the establishment of such rest periods.

A ALLIED PILOTS ASSOCIATION

P
A P.O. Box 5524 • ARLINGTON, TEXAS 76005-5524 • 214-984-3185
 January 13, 1993



Mr. Bill Edmunds, Chairman
 ARAC Air Carrier Operations Subcommittee
 c/o ALPA Safety Department
 1625 Massachusetts Ave. N.W.
 Washington, D.C. 20036

Dear Bill:

Approximately four weeks ago APA sent you a confidential working draft of the APA's Objections to the Proposed Controlled Rest Advisory Circular. We had previously submitted our preliminary objections in writing, and later verbalized the increasing breadth of our concerns at meetings of the Controlled Rest Working Group and the Air Carrier Operations Subcommittee.

Enclosed is a signed copy of APA's formal statement of objections to the proposed Advisory Circular. As you can see, it is far too comprehensive to be reduced to a single paragraph or even a page in a letter of transmittal. The statement of objections is 30 pages long and the appendices, containing related source documents contains an additional 100 pages.

Due to the extremely serious safety implications of the proposed procedure, APA has devoted considerable time and effort to create a complete statement of our objections. Pursuant to our request at the last meeting of the Air Carrier Operations Subcommittee (noted in the minutes of that meeting), it remains our request that the entire document be made a part of the record and be transmitted to the FAA with the proposed Controlled Rest Advisory Circular. As we discussed, to ease the Subcommittee's administrative burden APA will furnish signed copies directly to all ARAC members, to the Air Carrier Operations Subcommittee, and to the FAA, with a copy of this letter attached. We will also provide additional copies to other interested parties upon request.

Thank you for your attention to this matter. Your assistance in making APA's objections a part of the official record is appreciated.

Sincerely,

Capt. Brian A. Mayhew
 ARAC Representative For the APA

BAM/elc

cc: R. T. LaVoy/B. B. Bickhaus/M. P. Cronin/A. J. Broderick
 ARAC Members/Air Carrier Operations Subcommittee

Enclosure

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THE ALLIED PILOTS ASSOCIATION'S OBJECTIONS TO
 THE PROPOSED "CONTROLLED REST" ADVISORY CIRCULAR
 ("COCKPIT NAPPING")
 FOR U.S. CERTIFICATED AIR CARRIERS

Presented To

The Aviation Rulemaking Advisory Committee (ARAC)



Prepared at the direction of Captain Richard T. LaVoy, President

By Captain Brian A. Mayhew and Captain Michael P. Cronin

November 19, 1992

II. TASK AUTHORITY EXCEEDED

III. NASA'S RESEARCH DOES NOT SUPPORT THE PROPOSED ADVISORY CIRCULAR

IV. THE PROPOSED ADVISORY CIRCULAR GOES FAR BEYOND AVAILABLE DATA

- A. Critical Differences Between Two- and Three-Crew Operations Ignored**
- B. Current In-Flight Crew Rest Practices Would Be Degraded**
- C. NASA Did Not Study Two-Pilot Operations Or Domestic Operations**
- D. Prevention Of Inadvertent Sleeping By "Alert" Pilot Not Addressed**

V. RESPONSIBILITY AND PUBLIC TRUST

VI. OPERATIONAL SAFETY CONCERNS

The Proposed Advisory Circular Leaves Major Questions Unanswered

VII. REGULATORY AND LEGAL CONCERNS

- A. Aircraft Certification Standards Contradicted**
- B. Approved Operating Procedures/Operating Manuals Invalidated**
- C. Single Pilot Operations Created**
- D. Physiological Needs Redefined**
- E. Duty of Care For "Common Carriers" And Captain's Responsibility Ignored**
- F. No Coordination With International Authorities**

VIII. COCKPIT NAPPING EPITOMIZES CHOOSING ECONOMICS OVER SAFETY

2000

Pilot Fatigue: Unresponsive Federal Aviation Regulations and Increasing Cockpit Technology Threaten to Rock the Nation's Pilots to Sleep and Compromise Consumer Safety

Temesha Evans-Davis

These sleep realities are forcing the aviation industry to look even further for solutions than “NASA naps.” “One of the strategies being considered for long-haul crews . . . is isolating or ‘quarantining’ crews the day before a flight in order to provide the opportunity for maximum rest.”²²⁷ The NTSB suggests that even “off-duty hours must be ‘managed’ with a view toward flight safety.”²²⁸

Although the United States has studied fatigue and countermeasures just as its Canadian sister has, it has not been as successful in implementing FCP findings. At the nebulous core of this standstill is the ever-present economic factor of revision and change. No one wants exhaustion and fatigue to be intrinsic job characteristics for pilots, but few people are thrilled with increasing airline operating costs by billions of dollars to implement more responsive fatigue solutions.

9-2-2017

Attitudes Toward Controlled Rest in Position (CRIP): A Gender Comparison Between Pilots and Non-Pilots

Stephen Rice

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“Although CRIP is not in practice in the United States, this study attempts to compare attitudes of consumers and pilots toward the use of CRIP, for determining their willingness to fly as passengers on a commercial flight”

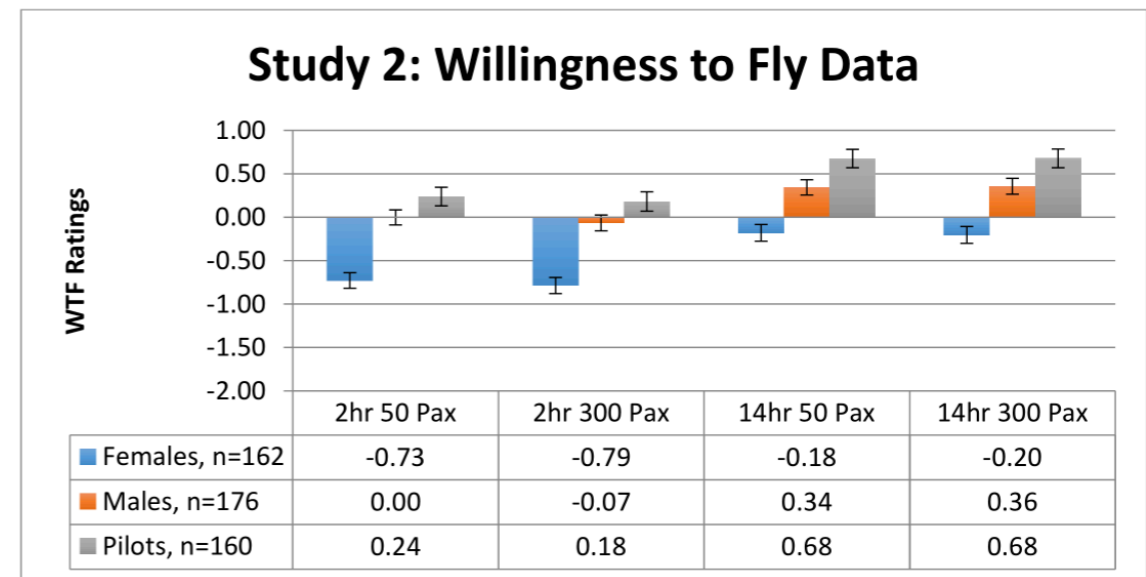


Figure 4. Study 2 average willingness to fly data. Standard error bars included.

“The study attempts to determine consumer ‘buy-in’ to help reduce government and airline uncertainty on adopting CRIP in their operations. Determining consumer acceptance could lead to the development of a unified standard for practicing CRIP and combating pilot fatigue in flight.”



Public Opinion



Regulators

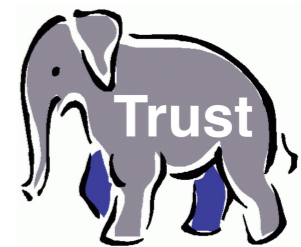
AOC

ATPL

Airlines

employee

Crew



Thank You