

FATIGUE RISK MANAGEMENT

1	ORO.FTL.120	<p>FATIGUE RISK MANAGEMENT</p> <p>How “big” and “complex” an Operator’s activity has to be for an FRMS to be required?</p> <p>What happens if, with a “big and complex” activity an Operator does not implement any kind of FRMS?</p>	<p>See Opinion 04/2012 paragraphs 74. & 75.:</p> <p>The explicit requirement for FRM is in Section 2 of Subpart FTL. FRM is compulsory if</p> <ul style="list-style-type: none"> - in ORO.FTL.205 (b) table 4, when an operator wishes to reach the maximum FDP of 12 hours for crew members in an unknown state of acclimatisation and - in CS.FTL.1.235 (c) allowing the use of reduced rest arrangement only under FRM. - CS.FTL.1.235 (b)(2) also instigates operators to ‘monitor’ the effect of rotations and combinations of rotations on crew fatigue and - CS FTL.1.205 advises operators to ‘actively manage’ the fatiguing effect of night duties of more than 10 hours in relation to the surrounding duties and rest periods. <p>The use of FRM is however encouraged and FRM might also be a useful tool to demonstrate compliance with the responsibilities established in ORO.FTL.110, especially point (b). This point obliges operators to ensure that FDPs are planned in a way that enables crew members to remain sufficiently free from fatigue so that they can operate to satisfactory level of safety under all circumstances.”</p> <p>Further more ,</p> <p>Annex VI ICAO, Operation of Aircraft Part I, Chapter 4.10.2 says:</p> <p><i>The State of the Operator shall require that the operator, in compliance with 4.10.1 and for the purposes of managing its fatigue-related safety risks, establish either:</i></p> <ul style="list-style-type: none"> <i>a) flight time, flight duty period, duty period and rest period limitations that are within the prescriptive fatigue management regulations established by the State of the Operator; or</i> <i>b) a Fatigue Risk Management System (FRMS) in compliance with 4.10.6 for all operations; or</i> <i>c) an FRMS in compliance with 4.10.6 for part of its operations and the</i>
---	-------------	--	--

			<p>requirements of 4.10.2 a) for the remainder of its operations. Chapter 4.10.4 : <i>The State of the Operator shall approve an operator's FRMS before it may take the place of any or all of the prescriptive fatigue management regulations. An approved FRMS shall provide a level of safety equivalent to, or better than, the prescriptive fatigue management regulations.</i></p> <p>DOC ICAO 9966 Fatigue Risk Management System: <i>"It would be a misconception to think of an operator with an FRMS as having no flight and duty time limitations. In fact, an operator continues to have flight and duty time limitations but these are identified through its own FRMS processes, specific to a defined operational context, and are continually evaluated and updated in response to its own risk assessments and the data the operator is collecting. It is up to the regulator to assess whether the risk assessments, mitigations and data collected are appropriate, and whether the flight and duty time limitations identified are reasonable responses as evidenced in safety performance indicators".</i> (12/06/2015)</p>
2	ORO.FTL.120	<p>FATIGUE RISK MANAGEMENT Shall the Operator implement an FRM on 18 february 2015?</p>	<p>See question 1. (12/06/2015)</p>
3	ARO.OPS.235	<p>DEVIATION FROM CS/IFTSS Deviating from a CS (e.g. CS FTL 1.200 – home base) means that the operator shall propose an IFTSS and that approval must follow the whole procedure i.a.w. art. 22(2) reg.216/2008, EASA assessment included? That also means propose a FRM or having an FRM already implemented ?</p>	<p>An operator may seek approval for an IFTSS deviating from CS FTL.1.200(a) under the provisions of ORO.FTL.125(c). The operator shall provide an assessment demonstrating that the requirements of Regulation (EC) No. 216/2008 and Subpart FTL are met. The need for an approved FRM should be assessed by the competent authority (CA) on a case-by-case basis depending on the complexity of the operation and multiple airport base proposal. (12/06/2015)</p>
4	ARO.OPS.235	<p>IFTSS Is a FRMS required when the operator wants to propose IFTSS? Shall the FRMS be already approved and "running" before approving IFTSS?</p>	<p>See question 1. An FRM approval demonstrates an operator's data collection capability and operational maturity. Both are elements to be considered by the CA during the approval process.</p>

ENAC – ENTE NAZIONALE AVIAZIONE CIVILE

FLIGHT TIME LIMITATION (FTL) - FREQUENT ASKED QUESTIONS

		If previous questions are affirmative, what if an Operator implement FRMS in order to propose a IFTSS, and then IFTSS is not approved?	A functional and approved FRM should enable the operator to propose an IFTSS with effective mitigating measures. If the operator demonstrates that the mitigating measures are effective, the IFTSS should be approved. Should the operator's show that mitigating measures need to be adapted, the FRM processes will instigate immediate corrective actions. (12/06/2015)
5	CS.FTL.1.205(a)(2)	<p><i>"The operator applies appropriate fatigue risk management to actively manage the fatiguing effect of night duties of more than 10 hours in relation to the surrounding duties and rest periods."</i></p> <p>In order to schedule more than 10 hours night duty, shall the operator have a fully operational FRMS implemented?</p>	<p>See EASA FAQ.</p> <p>No. The CS does not require a fully fletched and approved fatigue risk management in accordance with ORO.FTL.120 to operate long night duties. CS FTL.1.205(a)(2) instructs the operator to apply <i>appropriate fatigue risk management</i> to actively manage the fatiguing effect of night duties of more than 10 hours in relation to the surrounding duties and rest periods. The meaning of <i>appropriate fatigue risk management</i> is explained in GM1 CS FTL.1.205(a)(2).</p> <p>The complexity of the operation and the related rostering system will determine how this needs to be implemented.</p> <p>The operator shall in any case demonstrate compliance with ORO.FTL.110 using its SMS processes.</p> <p>(12/06/2015)</p>
6	CS.FTL.1.235(c)	<p>(c) <i>Reduced rest</i></p> <p>(2) <i>Reduced rest is used under fatigue risk management.</i></p> <p>In order to schedule reduced rest, shall the operator have a fully operational FRMS implemented?</p>	<p>Yes.</p> <p>(12/06/2015)</p>
FLIGHT DUTY PERIOD (FDP)			
7	ORO.FTL.205	<p>FLIGHT DUTY PERIOD (FDP) PARA (d)</p> <p><u>Use of planned extension for non augmented crews:</u> is it allowed to plan extended FDP on a twice a week basis even for multiple flights legs transiting on home bases?</p> <p>Shouldn't this twice a week extra hour be applied for "particular" cases only, instead of for planning routine activities?</p>	<p>Yes, it is allowed.</p> <p>(12/06/2015)</p>

8	ORO.FTL.205	<p>FLIGHT DUTY PERIOD (FDP) PARA (d) (3)</p> <p><i>“(d) Maximum daily FDP for acclimatised crew members with the use of extensions without in-flight rest.</i></p> <p><i>(3) The use of the extension shall be planned in advance, and shall be limited to a maximum of:.....”</i></p> <p>What does “shall be planned in advance” actually mean?</p>	<p>Before the reporting time. (12/06/2015)</p>
9	ORO.FTL.205(b)	<p>EXTENSION OF FDP WITHOUT IN-FLIGHT REST</p> <p>Interpretation of the rule? Looks like It is taken for granted that an Operator , for commercial purposes, can regularly plan a 1 hour extension (up to 13 hours) twice a week, regardless of the type of operations , for example transiting at home base or planning a leg from FCO to MIA?</p>	<p>Yes. (12/06/2015)</p>
10	CS FTL.1.205(c)(2)	<p>MAXIMUM DAILY FDP WITH THE USE OF EXTENSIONS DUE TO IN FLIGHT REST.</p> <p>As for ORO.FTL.205(e), the maximum daily FDP with the use of extensions due to in flight rest, takes into account rest facilities, number of flight crew members, number of legs, minimum in-flight rest as for ORO.FTL.205(e). Why does not take into account the start of FDP at reference time?</p> <p>Example: The max FDP of a flight crew of four with rest facilities “class 1” is always 17 hours (plus 1h extension) independently from start of FDP at reporting .</p>	<p>See EN to Opinion 04/2012 paragraph 95.</p> <p>These limits are irrespective of the WOCL. This approach has been chosen in order to keep the rule simple and easy to implement. It is based on the operational experience of some operators which have used similar provisions for several years. More recently, some Member States have used this method under EU-OPS Article 8. Since in-flight rest during the night hours is more conducive to recuperative sleep, the Agency considers that it compensates for the greater extension that is applied to an FDP encroaching the WOCL.</p> <p>(12/06/2015)</p>
REST PERIODS			
11	ORO.FTL.235	<p>REST PERIODS (e) POINTS (1) AND (2)</p> <p><i>“(e) Flight time specification schemes shall specify <u>additional rest periods</u> in accordance with the applicable certification specifications to compensate for:</i></p> <p><i>(1) the effects of time zone differences and extensions of the FDP;</i></p> <p><i>(2) additional cumulative fatigue due to disruptive schedules; and.....”</i></p> <p>Requirements for “additional rest” are not specified. Some Operators assume that “legal=safe” equation is the requirement.</p>	<p>The additional rest periods as required by ORO.FTL.235(e) are described in CS FTL.1.235(a) and (b).</p> <p>CS FTL.1.235(b)(2) require the operator to monitor the effect on crew member fatigue of rotations with time zone differences, and to adapt the rosters as necessary.</p> <p>This means that the operator’s SMS must evaluate the risk of such operations and determine if the legal minimum mitigations are sufficient for the operator’s specific operation.</p> <p>(12/06/2015)</p>

ENAC – ENTE NAZIONALE AVIAZIONE CIVILE

FLIGHT TIME LIMITATION (FTL) - FREQUENT ASKED QUESTIONS

		With this rule, does 14 hours or previous DP, whichever is greater, become the requirement for rest away from home base on a WOCL overlapping rotation and 7 time zones crossed?	
NUTRITION			
12	ORO.FTL.240 AMC1 ORO.FTL. 240 (a)	<p>NUTRITION</p> <p>Is the meal opportunity a “break” during in flight duties for crews employed in multiple short haul legs flights (1 hour flight time)?</p> <p>Are meal opportunities due also for duties shorter than 6 hours when they overlap a main meal time or WOCL?</p>	<p>AMC1 ORO.FTL.240 (a) requires the operator to define the minimum duration of the meal opportunity [...]. ORO.FTL.105 (6) defines ‘break’ as a period of time within a flight duty period, shorter than a rest period, counting as duty and during which a crew member is free of all tasks.</p> <p>(12/06/2015)</p>
13	ORO.FTL.240	<p>NUTRITION</p> <p><i>“During the FDP there <u>shall</u> be the opportunity for a meal and drink in order to avoid any detriment to a crew member’s performance, especially when the FDP exceeds 6 hours”.</i></p> <p>Any FDP shall include the opportunity to eat and drink in order to avoid a crew member performance detriment but it is not specified a minimum time. Which is the minimum acceptable meal time to be schedule?</p> <p>How shall this scheduled meal time be included in the daily Duty Time?</p> <p>Could be a concern that pilots consume this eat and drink opportunity when they are performing PF/PM (minimum crew) duties and in the flight deck?</p>	<p>It is not possible to make binary compliance non –compliance statement for a numerical value of a minimum duration of the meal opportunity. This depends on circumstances. The OM should define the minimum based on the operational circumstances. The operator should be prepared to demonstrate how the objective (eat and drink something) is achieved.</p> <p>The meal opportunity is part of the duty period and counts in full as duty/ flight duty.</p> <p>CAT.OP.MPA.210 (a)(2) requires flight crew members on duty to be at the assigned station during all other [than take-off and landing] phases of flight, unless absence is necessary for the performance of duties in connection with the operation or for physiological needs, provided at least one suitably qualified pilot remains at the controls of the aircraft at all times.</p> <p>(12/06/2015)</p>
HOME BASE			
14	CS FTL 1.200	<p>HOME BASE</p> <p><i>“Home base” means the location, assigned by the operator to the crew member, from where the crew member normally starts and ends a duty period or a series of duty periods and where, under normal circumstances, the operator is not responsible for the accommodation of the crew member concerned.</i></p>	<p>In accordance with CS FTL.1.200 the home base is a single airport location assigned with a high degree of permanence.</p> <p>(12/06/2015)</p>

		Operators may plan crew operations from different airports in the same city/state. It is not clear what is intended for "location". At the moment, an operator could consider a Country, another one could consider a group of cities. Is the only allowable interpretation for "location" a single (ICAO code) airport, for example, LIML?	
RESERVE			
15	ORO.FTL.230	<p>RESERVE AFTER MORE THAN "ONE SINGLE DAY FREE OF DUTY" In consideration of the definition of "single day free of duty" ("a time free of all duties and standby consisting of one day and two local nights, which is notified in advance"), can an operator plan a reserve period starting at 00:15 after 2 or more days off (after more than a "single day free of duty") ? What " for the purpose of complying with the provisions of Council Directive 2000/79/EC" means?</p>	Regulation 83/2014 does not regulate 'days off'. (12/06/2015)
16	ORO.FTL.105	<p>DEFINITIONS (23) SINGLE DAY FREE OF DUTY "Single day free of duty" means, for the purpose of complying with the provisions of Council Directive 2000/79/EC, a time free of all duties and standby consisting of one day and two local nights, which is notified in advance. A rest period may be included as part of the single day free of duty. " Is it allowed to start a reserve/duty period from midnight (00:01) if the previous day is a "day free of duty" or a vacation day? At what time can be rostered a duty or a reserve after a "single day free of duty" or after 3 days of vacations? Does it make any difference?</p>	See question 15. (12/06/2015)
18	CS FTL.1.230	<p>RESERVE The operator assigns duties to a crew member on reserve under the provisions of ORO.FTL.230 complying with the following: (a) An assigned FDP counts from the reporting time. (b) Reserve times do not count as duty period for the purpose of ORO.FTL.210 and ORO.FTL.235. (d) To protect an 8-hour sleep opportunity, the operator rosters a period of</p>	Such roster must define when the reserve starts and ends. The roster must also comply with the requirements of ORO.FTL.235 (d) (Recurrent extended recovery rest periods). In accordance with CS FTL.1.230 (b), reserve times do not count as duty period for the purpose of ORO.FTL.210 (Cumulative flight time and duties periods) and ORO.FTL.235 (Rest Periods). Roster should take in consideration also GM1 ORO.FTL.230(a)

		<p>8 hours, taking into account fatigue management principles, for each reserve day during which a crew member on reserve is not contacted by the operator.</p> <p>Is it allowed to create a pilot roster with “reserve” duty only (ORO.FTL.230)?</p> <p>If the previous condition is allowed, how could Duty/Flight Duty limits be included in that kind of roster?</p> <p>If the previous two conditions are met, is this reserve day included in the maximum weekly/bi-weekly/monthly/annual Duty limits and shall not be considered a “day free of duty” as per ORO.FTL.105 DEFINITIONS (23)?</p>	<p>(ROSTERING OF RESERVE)</p> <p>“Including reserve in a roster , also referred to as 'rostering', implies that a reserve period that does not result in a duty period may not retrospectively be considered as part of a recurrent extended recovery rest period”.</p> <p>Regulation 83/2014 does not regulate days off.</p> <p>(12/06/2015)</p>
19	CS FTL.1.230	<p>RESERVE</p> <p>Is it allowed to modify a “day free of duty”, following the last reserve day, in one or more duty days?</p>	<p>Regulation 83/2014 does not regulate days off.</p>
VARIOUS			
20	ORO.FTL.105	<p>DEFINITIONS (24) SECTOR</p> <p>“Sector” means the segment of an FDP between an aircraft first moving for the purpose of taking off until it comes to rest after landing on the designated parking position.</p> <p>An abnormal case or emergency condition related to a major system failure which determine a return to the stand before take-off would not automatically reduce the maximum sector allowance and the maximum daily FDP. This increase crews workload and could be considered a Safety issues. How the Rulemaker and the NAA could mitigate this evidence?</p>	<p>In such cases the commander has the possibility to decide on the modification of the maximum flight duty period (FDP) and minimum rest, including by reducing the FDP or increasing the rest.</p> <p>Besides, in order to protect the commander against possible pressure from his/her employer, ORO.FTL.205 (f)(6) requires operators to implement a non-punitive process for the use of the commander's discretion.</p> <p>(12/06/2015)</p>
21	ORO.FTL.110	<p>OPERATOR RESPONSIBILITIES - EXTENDIBLE ROSTER</p> <p>“Changing a schedule and/or crew arrangements if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period”.</p>	<p>The following conditions must be fulfilled in order to use an FDP extension of up to 1 hour without in-flight rest:</p> <ul style="list-style-type: none"> • Not more than twice in 7 consecutive days; • The minimum pre-flight and post-flight rest periods shall be increased by 2 hours or the post-flight rest shall be increased by 4

		Italian NAA allows operators to use “extendible roster” instead of “extended roster”. This doubtful practice allow to plan crew roster extensions even if the Basic Daily Maximum Flight Duty Period is not exceeded. In this way operators may automatically gain one hour of FDP and crew is forced into a longer daily use. This practice it is not included in the actual legislation and it could be totally out of control by ORO.FTL.205 Flight duty period (FDP) (d). Is this practice allowed with the new rules?	hours; <ul style="list-style-type: none"> The use shall be planned in advance. (12/06/2015)
22	ORO.FTL.105	<p>DEFINITIONS (10) (21) MOBILE DAY FREE OF DUTY</p> <p>(10) “Duty” means any task that a crew member performs for the operator, including flight duty, administrative work, giving or receiving training and checking, positioning, and some elements of standby</p> <p>(21) “rest period” means a continuous, uninterrupted and defined period of time, following duty or prior to duty, during which a crew member is free of all duties, standby and reserve;</p> <p>ORO.FTL.105 – Definitions sub-paragraph (10) describes “duty” and sub-paragraph (21) describes “rest period”. No “mobile rest day” definition is legally adopted and accepted.</p> <p>According to the new rules, it possible for an Operator to identify a “day free of duty” as “mobile day free of duty” in a crew roster?</p> <p>Example: actually, this doubtful practice allows to program crew roster with “possible on duty days” (called “mobile rest days” not included in the definitions), instead of use “duty days”, “stand-by” or “reserve”. These days are usually changed by Operators from rest days to duty days, mostly when these days follow a stand-by day. They are incorrectly included in the minimum monthly free of duty days (according to 2000/79/CE – DL 185/2005) because they are usually considered, on operator discretion, as an additional stand-by day. In this case crew members are not free to plan their rests and private life necessities</p>	Reg. 83/2014 does not regulate ‘days off’. Roster stability is addressed in ORO.FTL.110. (12/06/2015)
23	ORO.FTL.210	DUTY - REMOTE TRAINING	The National Authority is responsible for the implementation of Reg.

		<p>ORO.FTL.105 defines “giving or receiving training” as a duty. Shall this time be included and communicated to crew members only in the roster note, according to ORO.FTL.105?</p> <p>Shall this time be indicated in the daily duty in order to permit a clear check of individual duty time limits?</p> <p>Example: this practice allows Italian Operators to omit the accountability of the remote training duty time, it doesn't contribute to the cumulative Duty time limits as per:</p> <p>ORO.FTL.210 “Flight times and duty periods” and to the annual duty limit fixed in 2000h of duty according to 2000/79/CE – DL 185/2005 Art. 3.</p>	<p>83/2014.</p> <p>The time needed for ‘remote’ or web based training should be indicated in the operator’s training documentation. The operator should count the average time needed for such training for the purpose of cumulative duty time (ORO.FTL.210).</p> <p>(12/06/2015)</p>
24	ARO.OPS.230	<p>EARLY/LATE TYPE</p> <p>According to ARO.OPS.230 Determination of disruptive schedules: <i>for the purpose of flight time limitations, the competent Authority shall determine, in accordance with the definitions of “early type” and “late type” of disruptive schedules in point ORO.FTL.105 of Annex III, which of those two types of disruptive schedules shall apply to all CAT operators under its oversight.</i></p> <p>Is it allowed any other definition of Early/Late Type schedules not included in ORO.FTL.105 Definitions 8 (a) and (b)?</p> <p>If not, shall every NAA indicate only one of this two allowable options to the Operators in order to define the schedule method?</p>	<p>Reg. 83/2014 does not foresee other definitions than those reflected in ORO.FTL.105. It is however, possible to derogate (Art. 14.6) or deviate (Art. 22.2) from the rules for disruptive schedules.</p> <p>(12/06/2015)</p>
25		<p>PREVIOUS NATIONAL DEROGATIONS</p> <p>According to COMMISSION REGULATION (EU) No 83/2014 of 29 January 2014 amending Regulation (EU) No 965/2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, have all the previous national rules (deviations/derogations) ceases to have legal value?</p>	<p>Any derogation, deviation or national rules in relation to EU-OPS Subpart Q ceases to be applicable on 18 February 2016.</p> <p>(12/06/2015)</p>
26	ORO.FTL.125(b)	<p>FLIGHT TIME SPECIFICATION SCHEMES</p> <p>(b) Before being implemented, flight time specification schemes, including</p>	<p>An operator’s FTSS is an approval item, therefore any changes thereto require prior approval.</p>

ENAC – ENTE NAZIONALE AVIAZIONE CIVILE

FLIGHT TIME LIMITATION (FTL) - FREQUENT ASKED QUESTIONS

		<p>any related FRM where required, shall be approved by the competent authority.</p> <p>How practically the Authority approves the FTSS proposed by the Operator within 18/02/2016 ? Is there an approval of OM/A cap.7? Does any change require prior approval from the Authority?</p>	(12/06/2015)
27	Reg.ENAC integrativo Capo Q	MINIMUM CABIN CREW EFFECTIVELY ON DUTY DURING LONG RANGE CRUISE.	<p>National requirements (Regolamento ENAC Integrativo al capo Q) ceases to be applicable on 18 February 2016.</p> <p>EASA rulemaking is in progress .</p> <p>(12/06/2015)</p>
28	ORO.FTL.105(1)	<p>ACCLIMATISATION</p> <p>How does the operator manage acclimatization principles in crews operating in long range flights with FDP extensions due to in flight rest?</p>	<p>When the crews (flight & cabin) use in-flight rest, acclimatisation's principles and relative max FDP in table 2,3,4 of ORO.FTL.205(b) are not applicable, and the max FDP for the departure after a layover is not dependent of the acclimatisation's principles and information contained in table 1 of ORO.FTL.105, but only by type of rest facilities, minimum in-flight rest, number of sectors and augmentation of flight crew.</p> <p>In fact, As soon as there is in-flight rest the time of the day and state of acclimatisation become irrelevant. This is because crew members can manage their fatigue with the in-flight rest.</p> <p>(12/06/2015)</p>
29	ORO.FTL.205(e)	<p>OPT-OUT FOR IMPLEMENTATION OF ORO.FTL.205(e)</p> <p>If the operator decide to use the opt out for the determination of extension of FDP due to in flight rest, what rule shall apply for calculate the max FDP with extensions?</p>	<p>Opt-Out is applicable only to point (e) of ORO.FTL.205, regarding the extension of FDP.</p> <p>In this case the operator will add the extensions referred in Regolamento ENAC integrativo al capo Q, art. 4 to the basic FDP from table 2 of ORO.FTL.205(b) .</p> <p>(12/06/2015)</p>
30	ORO.FTL.235(e)	<p>REST PERIOD IN ROTAZIONI CON ALTERNANZA WESTWARD-EASTWARD O VICEVERSA</p> <p>Come si quantifica il riposo dei membri di equipaggio in seguito a turni (rotations) che interessano più fusi orari (time difference zones) con alternanza Westward-Eastward o viceversa?</p>	<p>La ORO.FTL.235(e) riporta che gli schemi FTL dell'operatore (FTSS) devono specificare i periodi addizionali di riposo per compensare (1) gli effetti dovuti a all'attraversamento di fusi orari (time zone difference), in accordo alla relativa CS FTL.1.235.</p> <p>Nella tabella in CS FTL.1.235(b)(3)(i) sono individuate le notti locali</p>

			<p>minime di riposo a "home base" dovute dopo qualsiasi rotazione che interessa quattro o più fusi orari, in funzione dei fusi attraversati e del tempo che intercorre tra l'orario di presentazione ad home base della tratta di andata e l'orario di presentazione della tratta di ritorno nella stessa rotazione.</p> <p>La CS FTL.1.235(b) al punto (4) specifica che, fatto salvo quanto riportato nella tabella in CS FTL.1.235(b)(3)(i), nel caso di due rotazioni successive alternate <i>Eastward-Westward</i> (per esempio rotazione FCO-NRT-FCO seguita da rotazione FCO-JKF-FCO) o viceversa ed ogni singola rotazione interessi almeno quattro fusi orari (<i>time zone difference</i>), l'operatore deve assegnare un numero minimo di tre notti locali di riposo a home base, a prescindere della "direzione" della prima rotazione e dalle condizioni riportate in tabella.</p> <p>Fermo restando il minimo di 3 notti locali di riposo a home base sopra riportato, l'Operatore definisce e monitora il numero effettivo delle notti di riposo assegnate (≥ 3) rispettando i vincoli della tabella in CS FTL.1.235(b)(3)(i) nonché i principi di responsabilità e di prevenzione della fatica.</p> <p>La CS FTL.1.235(b)(1) definisce il concetto di "<i>rotation</i>". (07/07/2016)</p>
31	ORO.FTL.110	<p>CHANGE OF ROSTER WITH SHORT NOTICE La AMC definisce che i turni devono essere pubblicati con almeno 14 gg di anticipo. E' possibile effettuare cambi di turno con preavviso inferiore?</p>	<p>Allo stesso quesito EASA risposto come segue: "Yes, provided that the operators with ORO.FTL.110(a). Operators must demonstrate their system fulfils the requirement ORO.FTL.110(a). This demonstration could be supported by the application of an operator's SMS processes to its rostering system. There is no IR that forbids the communication of changes to a published roster. On the other hand, all other rules, i.e. those concerning rest before an FDP, need to be observed"</p> <p>Valga l'ulteriore esempio del requisito ORO.FTL.110(j), in particolare delle relative AMC e GM, in base alle quali l'operatore definisce e</p>

			<p>monitorizza indicatori di <i>performance</i> per misurare stabilità e robustezza dei turni di servizio.</p> <p>Pertanto, in considerazione del quadro normativo citato, i cambi di turno con preavviso inferiore a 14 gg dovrebbero essere effettuati dall'operatore soltanto in situazioni di necessità operative impreviste, in modo da non incidere sugli indicatori di <i>performance</i> citati e in ogni caso gestendo adeguatamente i rischi connessi.</p> <p>(07/07/2016)</p>
32	<p>ORO.FTL.225</p> <p>ORO.FT.230</p>	<p>STANDBY OTHER THAN AIRPORT & RESERVE</p> <p>I giorni assegnati in <i>Reserve</i> possono essere modificati in periodi di <i>standby other than airport</i>, comunicando tale modifica il giorno precedente?</p>	<p>La norma prevede che durante il periodo di <i>standby</i> possa essere assegnato un impiego (<i>duty</i>) che inizi durante il periodo di <i>standby</i> stesso.</p> <p>Pertanto, la modifica del turno da <i>Reserve</i> a <i>Standby other than airport</i>, anche se comunicata durante un periodo di <i>standby</i> del giorno precedente, costituisce una modifica della turnazione con breve anticipo (vedere FAQ 31).</p> <p>(07/07/2016)</p>
33	<p>CS .FTL.1.225</p>	<p>STANDBY OTHER THAN AIRPORT</p> <p>Nel caso un periodo di <i>Standby</i> sia seguito da un FDP (assegnato durante lo <i>Standby</i>) che includa il riposo in volo, tale riposo può considerarsi come una interruzione del periodo massimo di veglia di 18 ore di cui alla CS.FTL.1.225(b)(2)?</p>	<p>In accordo alla CS FTL.1.225 (b)(2), le procedure di <i>standby</i> dell'operatore devono essere sviluppate in modo da prevenire che la somma del periodo di <i>standby other than airport</i> e del successivo FDP assegnato porti a più di 18 ore di "<i>awake time</i>". Tali procedure devono includere misure mitiganti definite dell'operatore.</p> <p>EASA non ha fornito una definizione del termine "<i>awake time</i>".</p> <p>La GM1 CS FTL.1.225(b)(2) riporta che più di 18 ore di "<i>continuous awake</i>" possono ridurre i livelli di allerta e dovrebbero essere evitati. Non si ritiene possibile che l'operatore possa verificare il periodo di veglia che il crew member trascorre in <i>standby</i> presso la propria abitazione, in quanto esclusiva responsabilità del crew member stesso.</p> <p>Pertanto, ENAC, coerentemente con le posizioni di altre Autorità Competenti Europee, ritiene che il riposo in volo, opportunamente gestito secondo i principi della ORO.FTL.205(e), possa costituire una delle azioni finalizzate al rispetto del limite di <i>continuous awake time</i>.</p>

			<i>(07/07/2016)</i>
34	ORO.FTL.240	<p>NUTRITION</p> <p>Come deve essere gestita dall'Operatore l'opportunità dei Crew Members di usufruire dei pasti durante gli FDP?</p>	<p>In accordo alla AMC1 ORO.FTL.240, trattandosi di argomento incluso nel Flight Time Specification Scheme, soggetto ad approvazione di ENAC in accordo al requisito ORO.FTL.125, l'OM Parte A (Chapter 7) deve specificare:</p> <ul style="list-style-type: none"> - la minima durata del periodo disponibile; - il periodo di tempo in cui è garantita tale opportunità , in particolare quando l'FDP comprende i consueti periodi dei pasti. <p>Se, per esempio, un FDP inizia alle 11:00 e termina alle 22:00, devono essere garantiti due periodi per usufruire dei pasti (rif AMC1 ORO.FTL.240).</p> <p align="right"><i>(07/07/2016)</i></p>