



# FEDERATION OF INDIAN PILOTS

FIP/ DGCA/18 - 02

29<sup>th</sup> November, 2018

To:  
Office of the Director General of Civil Aviation,  
Opp. Safdarjung Airport,  
Aurbindo Marg,  
New Delhi - 110 003.

**Kind Attn: Capt.Pankaj Anand,**  
**Dy.Chief Flight Operations Inspector**

**Sub: DRAFT CAR ON FDTL – COMMENTS.**

Dear Sir,

With reference to the comments required for the recently published Draft CAR on Flight Duty Time and Flight Time Limitations for Flight Crew, we would like to place our objection to both, the changes and the methodology adopted to bring about such changes in the rules, as they are not based on the scientific principles established for duty time guidelines for pilots.

As stated in the CAR and as required by all contracting states, the ICAO Annex 6, Operation of Aircraft, Part I, to the Convention on International Civil Aviation, requires standards and recommended practices for management of fatigue for flight crew members. This requires a through and detailed study based on scientific principles to establish a set of duty time guidelines for pilots. Instead it has been observed that the flight time has been enhanced which would invariably lead to an obvious increase in the fatigue quotient.

The pilots have recently aired their grievances about the fatigue being faced due to variations flown by them under the coercion of the operators in the Honorable Delhi High Court and were granted a much needed respite to disallow any changes in the law to protect flight safety. It is shocking to note that those variations have now been incorporated as normal rules in the draft in clear defiance of the ruling of the Court.. In fact the changes have gone beyond the variations in some cases further increasing the flight time, duty time, reducing the rest time and hence gravely enhancing the fatigue quotient already highlighted to the DGCA in the past.

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We also find that the draft CAR has not taken into consideration Pilots' feedback and also ignored feedback from stake holders. We would like to add that the FIP has been a stakeholder in previous discussions on the CAR for duty time rules. Being the widest representation of pilots, constantly receiving first hand feedback from them on crucial aspects, the FIP had proactively written to the DGCA on 12th February 2018, asking to be included in such discussions. Unfortunately, we have not been given that opportunity as a result crucial feedback from pilots including reports of fatigue has not been given due consideration. Our members have been constantly urging us to take this matter up with DGCA on a collective representation basis.

Some of the glaring changes like consecutive night flying, something that even the cabin crew has been vehemently protesting against has been introduced for pilots. This despite the protests cited in Court over a variation introduced on the same and subsequently cancelled. There is no justification for making duty time rules more tiring especially with the increase in the number of landings by night, increase in duty time under unforeseen operational and normal circumstances; taking away pilots rest time after time zone changes and combining their flight rest with their weekly time off. There are many other concerns in the draft that need to be elaborated on, in due course.

In view of the above, we request that due consideration be given to Pilot's fatigue over commercial interest as otherwise it would crucially affect the flight safety.

Thanking you,

Yours faithfully,

**(Capt. Vivek Nair)**  
**President - FIP**

